

Report of the Head of Development Management and Building Control Committee Report

Case Officer: Wai Hing Tse	2157/APP/2025/2060
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Date Application Valid:	31-07-25	Statutory / Agreed Determination Deadline:	20-10-26
Application Type:	Full	Ward:	Heathrow Villages

Applicant: **Landon Education Limited**

Site Address: **THE LODGE, HARMONDSWORTH LANE, WEST DRAYTON**

Proposal: **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.**

Summary of Recommendation: **GRANT planning permission subject to conditions**

Reason Reported to Committee: **Required under Part 1 of the Planning Scheme of Delegation (Major application recommended for approval)**



Summary of Recommendation:

GRANT planning permission subject to the conditions set out in Appendix 1.

1 Executive Summary

- 1.1 Planning permission is sought for the change of use of The Lodge and its Annex from offices (Use Class E) to a non-residential education centre (SEND school) (Use Class F1), with minor external works including gates, fencing, cycle stores and landscaping.
- 1.2 The proposal would provide an 88 place SEND school (ages 5-19) with 66 staff and, alongside the existing/approved SEND school at Aviation House, to create a campus for 128 pupils and 96 staff in total.
- 1.3 The principle of the proposed education use is acceptable, and there is no objection to the loss of office floorspace in this location. The proposal would not increase the building footprint or height, and the external alterations are modest and would preserve the special architectural and historic interest of the listed buildings and the character and appearance of the conservation area.
- 1.4 The development would retain 61 on-site parking spaces. Officers consider the parking provision acceptable in the context of comparable SEND schemes and subject to conditions requiring a Travel Plan and a Car Parking Management Plan, alongside controls on pupil and staff numbers. The planning application is recommended for approval subject to the conditions set out in Appendix 1 and Section 106 agreement.

2 The Site and Locality

- 2.1 The application site is accessed from the south side of Harmondsworth Lane, West Drayton, near the junction with Holloway Lane. It includes The Lodge with its Annex, Aviation House and the existing car park.
- 2.2 The Lodge is a 2-storey Grade II Listed Building (list entry number 1080217). The brick wall which bounds the Aviation House, The Lodge and Annex complex along Holloway Lane and Harmondsworth Lane is also Grade II listed (list entry number 1080218). The Lodge is currently used as offices (with some units vacant).
- 2.3 To the rear of The Lodge along the western boundary is the two-storey annex building which is a red brick and tiled building dating from the 20th century. It is connected to The Lodge by an access staircase.
- 2.4 Aviation House is a two-storey former office building subject to planning permission ref. 2157/APP/2023/3068 for a SEND school (Use Class F1).

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- 2.5 The application site is within the Harmondsworth Village Conservation Area and within two Archaeological Priority Areas (Heathrow APA and Harmondsworth APA). Part of the wider site (including part of Aviation House) lies within the Green Belt. The site is identified as Potentially Contaminated Land and is within an Air Quality Management Area. It is in Flood Zone 1 and has a PTAL rating of 1b.
- 2.6 Open fields designated as Green Belt extend to the south, west and east. The locally listed “Home Farm” abuts the western boundary and is also within the Green Belt. The surrounding area is predominantly residential.

Figure 1: Location Plan (application site edged red)



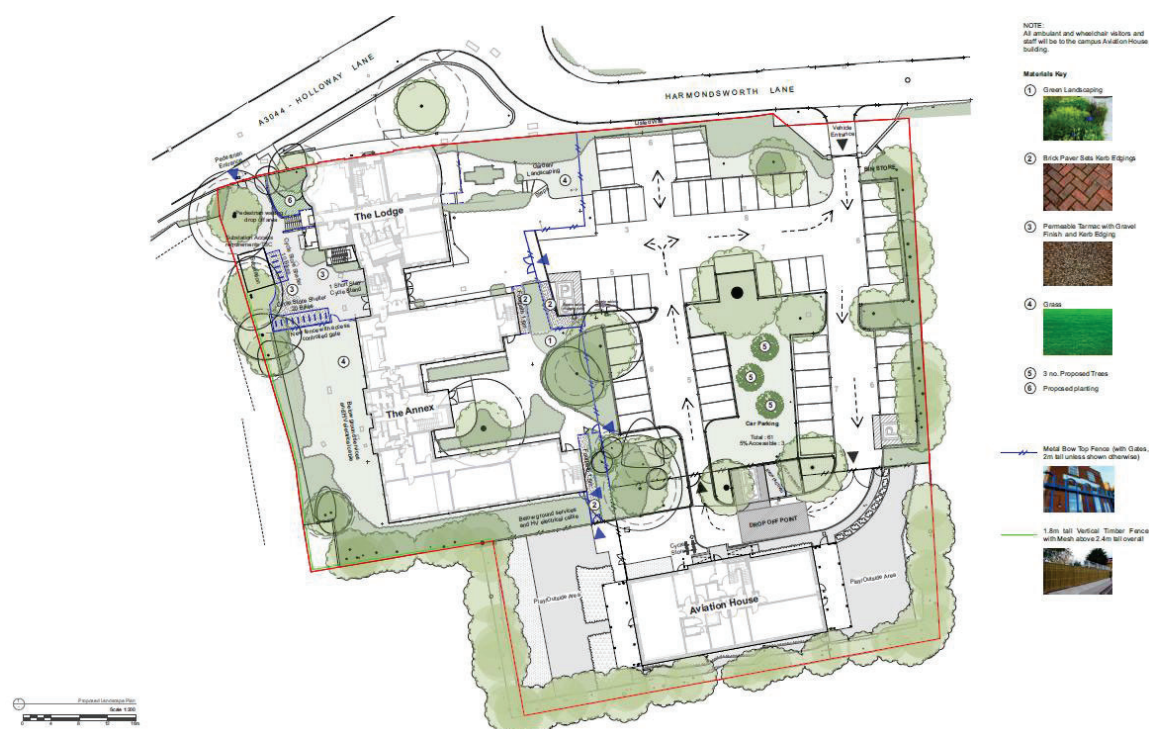
Figure 2: Street View Image of the Application Property



3 Proposal

- 3.1 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.
- 3.2 The proposal would convert The Lodge and its Annex building into a private 88-place SEND school for pupils aged 5 to 19, with 66 staff. The Lodge would accommodate 24 pupils in 3 classrooms of 8 pupils. The Annex would accommodate 64 pupils in 8 classrooms of 8 pupils.
- 3.3 Alongside the approved Aviation House SEND school (40 pupils aged 5 to 11, and 30 staff), the wider campus would cumulatively accommodate up to 128 pupils aged 5 to 19 and 96 staff across the three buildings.
- 3.4 The proposal would not increase the building's floor area or height. External works are modest and include safety/access features and associated landscaping.
- 3.5 During the course of the application, design amendments have been made to the proposal to allow wheelchair access into the proposed school.

Figure 3: Proposed Plan (please note – larger version of plan can be found in the Committee Plan Pack)



4 Relevant Planning History

- 4.1 A list of the relevant planning history related to the property can be found in Appendix 2.
- 4.2 Of specific relevance is application reference 2157/APP/2023/3068 which sought full planning permission for the 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. Permission was granted subject to conditions on 18/04/2024. The approved proposal has partially been implemented, and the SEND school has been in operation. The approved three-metre-wide footpath providing segregated pedestrian and cycle access from Holloway Lane to Aviation House along the side (west) of The Lodge and Annex has not been implemented.
- 4.3 Alongside the current planning application, the applicant has also submitted a Listed Building Consent No. 2157/APP/2025/2058 for alterations to The Lodge (Listed Building Entry No: 1080217) including, demolition of unoriginal internal walls, construction of internal walls and doors, replacement kitchen, balustrade on the roof terrace, replacement WCs, and replacement of a window to be fire rated on the south elevation as well as other decorative minor alterations. In accordance with the Council's scheme of delegations, Listed Building Applications are not required to be delegated to the Planning Committee for determination. Given that

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there was limited public response to the consultation, which was undertaken, a delegated approval was issued on 13-05-2026. This listed building application provides consent for the physical works to the building only but not the change of use which is subject to this full planning application.

5 Planning Policy

- 5.1 A list of planning policies relevant to the consideration of the application can be found in Appendix 3.

Emerging Planning Policies

- 5.2 Policy DM4 of the National Planning Policy Framework (NPPF) 2026 states that *'Local Planning Authorities may give weight to relevant policies in emerging plans according to:*

(a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
(b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
(c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).'

Draft London Plan (July 2026)

- 5.3 The GLA are consulting on a draft new London Plan between 16th July and 15th October 2026 with the intention of replacing the previous versions of the existing London Plan. Following the consultation, the draft London Plan will be subject to an independent Examination in Public before final adoption, expected in early 2028.
- 5.4 As the unresolved objections have not yet been submitted and published for decision-makers to review, limited weight can be afforded to the Draft London Plan (July 2026) at present.

6 Consultations and Representations

- 6.1 Public consultation has been undertaken. The Council consulted 87 neighbouring properties, Harmondsworth and Sipson Residents Association and Harmondsworth Conservation Area Advisory Panel on 14/08/2025. A site notice was displayed on 27/08/2025.
- 6.2 Representations received in response to public consultation are summarised in Table 1 (below). Consultee responses received are summarised in Table 2

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(below). Full copies of the responses have also separately been made available to Members.

Table 1: Summary of Representations Received

Representations	Summary of Issues Raised	Planning Officer Response
One individual letter of objection has been received.	Parking demand by school staff and potential parking pressure on the existing local highway network.	Discussed in the Transport, Parking and Highway Safety section (paragraphs 7.27 – 7.41) of this report.

Table 2: Summary of Consultee Responses

Consultee and Summary of Comments	Planning Officer Response
Harmondsworth Conservation Area Advisory Panel Heritage impacts are acceptable given minimal external changes. Reservations about • traffic/parking impacts on the village; • accessibility; and • limited outdoor space	Transport/parking matters are addressed in the assessment below, and conditions are recommended for a Travel Plan and Car Parking Management Plan. Accessibility has been considered including wheelchair access amendments. While the provision of outdoor play space would remain similar to that under the approved Aviation House scheme, the use of outdoor play space, i.e. during lunch breaks, would be purposefully staggered timings to safeguard younger students from older students. The applicant has also clarified that traditional school play areas such as sports pitches and facilities are not required.
Access Officer No impact on accessibility.	Noted. Accessibility is considered acceptable.
Land Contamination Officer No objection subject to recommended condition.	An appropriately worded contamination condition is recommended to be

	attached should the application be determined for approval.
Noise Specialist No objection.	Noted.
Planning Policy Officer Principle established through adjacent permission 2157/APP/2023/3068.	Noted.
Waste Services No comments / objections.	Noted.
School Place Planning and Policy Manager The Hillingdon Local Authority has a statutory responsibility to ensure sufficient school places are available for its residents and is actively delivering additional specialist provision in mainstream and special schools through capital investment programmes. On that basis, the Council does not currently require further independent special school places and is therefore unable to support the proposal for an additional 88-place special school catering for pupils up to 19 years of age.	Noted. The objection relates principally to borough school place planning / commissioning need, rather than the land-use suitability of the site for SEND school use. SEND school use on the wider site has already been established through the approval of ref. 2157/APP/2023/3068 for a 40-place primary-age SEND school, which has been at least partially implemented. The current proposal would broaden the educational offer within that established campus context by offering additional places for secondary and post-16 students. The officers consider that the proposal has the potential to support a more continuous SEND education offer within a familiar site setting.
Urban Design and Conservation Officer No objection but advises resolving access/safety issues up front; seeks assurances that no further listed building changes will be required.	The applicant has confirmed that no further alterations to the listed building would be required following approval. Any future works affecting the listed building would require listed building consent.

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Highway Officer An objection has been raised but confirms that it is not related to the proposed footpath/pedestrian access, school drop-off arrangements, supervised collection points, safeguarding procedures or minibus/taxi movements, and that these matters can be accommodated. The objection relates solely to the proposed retention of 61 parking spaces, which is considered excessive and unjustified for the proposed SEND school use, together with the absence of a robust Travel Plan and sustainable transport mitigation. The Highway Authority considers that the existing office parking provision cannot simply be carried forward to justify the proposed F1 use, that re-marking three spaces as disabled bays does not amount to a reduction in parking provision, and that insufficient evidence has been submitted to demonstrate operational need for the level of parking proposed.	The Highway Authority's objection is noted. Having regard to the site's PTAL of 1b, the existing on-site car park, the operational characteristics of SEND provision, comparable SEND school schemes, and the proposed Travel Plan and Car Parking Management Plan conditions, the level of parking proposed is acceptable in this case. The highway and parking issues raised are addressed in detail in the Highways and Parking section of this report (see paragraphs. 7.27 – 7.41).
Air Quality Officer No objection subject to conditions to reduce emissions during the demolition and or construction	Appropriately worded conditions are recommended to be attached should the application be determined for approval.

7 Planning Assessment

Principle of Development

- 7.1 The proposal involves the change of use of existing buildings from office (Use Class E) to a non-residential education use (SEND school) (Use Class F1) with minor external works. The principle of education and childcare facilities is supported by London Plan Policy S3, subject to matters such as appropriate

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location, accessibility and the mitigation of any impacts. At national level, NPPF (2026) Policy HC4 requires substantial weight to be given to the benefits of new or improved public service infrastructure or community facilities where proposals also make a demonstrable contribution to promoting good health, preventing ill-health, reducing health inequalities or supporting social interaction.

- 7.2 Office use is considered as a main town centre use under the NPPF. Policies TC3 and TC4 address new main town centre uses proposed outside town centres whilst London Plan Policy E1 and Hillingdon Local Plan Part 2 Policy DME 3 direct office development to preferred locations (such as town centres and established office clusters) and, in this context, the loss of office floorspace outside such preferred locations is not, in principle, resisted where it would not undermine designated employment areas.
- 7.3 There is no objection to the loss of this existing office space outside of a town centre and designated office growth area. The applicant has also submitted some evidence to demonstrate that despite continuous marketing effort, there has been lack of viable interest from the market on the existing office building. The proposed loss of office space in this locality would comply with the NPPF, Policy E1 of The London Plan, and Policy DME 3 of Hillingdon Council's Local Plan Part Two Development Management Policies.
- 7.4 The Council's Policy Team has been consulted and stated that the principle of development for a SEND school at this location has been established under the approved Aviation House scheme.
- 7.5 The Council's School Place Planning Manager does not support the current proposal on the basis that the Local Authority is already delivering additional specialist provision and does not currently require further independent special school places.
- 7.6 The comments are noted, however the proposal would broaden the educational offer on a site where primary-age SEND provision has already been approved (under planning permission no. 2157/APP/2023/3068), extending the campus beyond the existing primary-age offer to provide additional classrooms and provision for older year groups (secondary-age and post-16). The applicant has advised that the existing school is at capacity, with a waiting / consultation list of 35+ pupils and has provided referral data indicating increasing demand. The applicant also states that, for children with autism and other SEND needs, consistency and minimal change are particularly important.
- 7.7 The applicant has confirmed that the school operates a pupil pipeline planning approach which explicitly prioritises existing pupils as they move between phases, both from primary to secondary and from secondary to post-16 provision. As such, the proposed secondary-age and post-16 places would not simply add capacity but would provide a planned onward pathway for existing pupils within the same familiar educational environment and with consistent day-to-day travel arrangements. For pupils with severe autism and associated severe learning difficulties, the applicant explains that avoiding an enforced change of setting at

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transition points is particularly important in supporting wellbeing and educational progress. The proposal would therefore help to support a more continuous SEND education pathway on the site, reducing disruption for pupils as they progress through age groups, whilst also assisting families and local authorities by reducing the need to secure new onward placements for learners with particularly complex placement needs. This continuity of provision attracts positive weight in the planning balance.

- 7.8 It should also be noted that the current planning assessment is based on the suitability of this site to accommodate school use with associated alterations. As discussed in other sections in the report, the proposed development would not result in significant harms in various aspects. The proposed school use is therefore considered acceptable and in accordance with The London Plan.
- 7.9 Part of the wider site lies within the Green Belt. NPPF (2026) Policies GB6 and GB7, London Plan Policy G2, Hillingdon Local Plan Part 1 Policy EM2 and Hillingdon Local Plan Part 2 Policy DME1 4 attach great importance to protecting Green Belt land, with openness and permanence as its essential characteristics. The key test is therefore whether the proposal would amount to inappropriate development or otherwise harm Green Belt openness.
- 7.10 The proposal does not include additional external alteration on Greenbelt other than those approved under the Aviation House Scheme. The other external alterations to The Lodge and The Annex would be outside the boundary of Greenbelt and are considered minor, therefore would not harm the openness and setting of the Greenbelt.

Design / Character and Impact on the Listed Building and Conservation Area

- 7.11 The Lodge is a Grade II listed building, and the boundary wall is also Grade II listed, and the site lies within the Harmondsworth Village Conservation Area. The National Planning Policy Framework (2026) Policies HE4, HE5, HE6 and HE9, London Plan Policy HC1, Hillingdon Local Plan Part 1 Policy HE1 and Hillingdon Local Plan Part 2 Policies DMHB 1, DMHB 2 and DMHB 4 seek to conserve and, where appropriate, enhance the significance of designated heritage assets and to ensure that development preserves or enhances the character and appearance of conservation areas.
- 7.12 In addition to the above, London Plan Policies D1, D3 and D4 and Hillingdon Local Plan Part 1 Policy BE1, together with Hillingdon Local Plan Part 2 Policies DMHB 11 and DMHB 12, are directly relevant in seeking high quality design that responds positively to local character, context, scale and materials. These policies can be read in full in the Committee Report Part 3 – Policy Appendix and, in summary, require that proposals are sympathetic to their context and conserve the significance of heritage assets.
- 7.13 The proposed development would convert the existing listed building The Lodge from an office building into a SEND school without any substantial external alterations. Minor external alterations includes installation of rail metal balustrade,

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barrier guarding, handrails and window restrictors, in order to ensure safety and accessibility. These minor alterations would be moderate in size and locate on the eastern and western elevations of The Lodge, therefore not readily visible from the streetscene. The proposed internal alterations to The Lodge are considered minor in nature and necessary to support the proposed SEND school.

- 7.14 Similarly, the proposed external alterations in The Annex building, e.g. opaque glazing to existing windows, installation of window restrictors, are considered minor and would not be readily visible from the streetscene due to the set-back location away from Holloway Lane / Harmondsworth Lane.
- 7.15 As stated above the Council's Heritage and Conservation Officer has raised no objection to the proposal.
- 7.16 Overall, it is considered that the proposal would preserve and enhance the character and appearance of the Grade II listed building which in turns benefits the setting of the Conservation Area.

Residential Amenity

- 7.17 London Plan Policy D3 requires development to provide a high standard of amenity for existing and future users, including appropriate outlook and minimising adverse impacts. In respect of noise, London Plan Policy D13 (Agent of Change) requires that noise and other nuisance-generating development should put in place measures to mitigate and manage any impacts on neighbouring noise-sensitive uses. These aims are also reflected in Hillingdon Local Plan Part 1 Policy EM8, which seeks to safeguard land, air and noise quality and ensure impacts can be adequately controlled and mitigated. Hillingdon Local Plan Part 2 Policy DMHB 11 seeks to ensure development does not adversely impact the amenity of adjacent occupiers (including daylight/sunlight, outlook and overbearing effects). The key considerations are therefore whether the change of use and associated works would result in unacceptable impacts in terms of residential amenity (including noise) and whether appropriate mitigation is secured.
- 7.18 The nearest residential properties and noise-sensitive receptors are on Holloway Lane and Harmondsworth Lane, to the north of the site across the public highway with a separation distance of at least 14m between the nearest residential property (i.e. No. 20 Holloway Lane) and the application site boundary. There are open fields to the south and east and barns to the west.
- 7.19 The applicant submitted a Noise Impact Assessment. It includes acoustic design details aimed to meet the recommendations of Building Bulletin 93 - Acoustic Design of Schools: Performance Standards. It also concludes that the proposed development and its external play areas would not result in any significant noise impacts to the identified noise sensitive receptors.
- 7.20 The Council's Noise Specialist has been consulted and has no comments or objections to the proposal.

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- 7.21 The proposal is considered to comply with Policy D13 of The London Plan and Policy EM8 of Hillingdon Council's Local Plan Part One Strategic Policies.
- 7.22 The change of use and associated building and landscape alterations would be minor in scale and 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.
- 7.23 The proposal complies with Policy D3 of The London Plan and Policy DMHB 11 of Hillingdon Council's Local Plan Part Two Development Management Policies.

Open Space / Play Space

- 7.24 London Plan (2021) Policy S3 states development proposals for education and childcare facilities should incorporate suitable, accessible outdoor space.
- 7.25 While the provision of outdoor play space would remain similar to that under the approved Aviation House scheme, the use of outdoor play space, i.e. during lunch breaks, would be purposefully staggered to safeguard younger students from older students. The applicant has also clarified that traditional school play areas such as sports pitches and facilities are not required or useful for autistic children. Sports and team games require significant mental ability and awareness which is not possible for autistic children.
- 7.26 Therefore, the outdoor play space provision is considered sufficient and suitable for the proposed school use, in line with Policy S3 of the London Plan (2021).

Highways and Parking

- 7.27 London Plan Policy T4 requires development proposals to reflect and be integrated with current and planned transport access, capacity and connectivity, and to ensure proposals do not increase road danger. London Plan Policy T5 requires development to support cycling and remove barriers to cycling, and London Plan Policy T6 requires car parking to be restrained and provided in line with public transport accessibility and connectivity, reflecting the sustainable transport hierarchy
- 7.28 At local level, Hillingdon Local Plan Part 2 Policy DMT 6 requires that developments must comply with the parking standards outlined in Appendix C Table 1. Table 1 does not detail any standard for SEND schools. However, given it is an educational facility the standard under "Higher and Further Education Establishment (Vocational & Academic) Adult Training Centres and Schools" in Policy DMT6 can be applied, which states "on an individual basis using a transport assessment and (where applicable) a school travel plan / travel plan. Where relevant, provision should made for coach/bus access and parking".
- 7.29 The application site has a PTAL level of 1b. The proposed development would include the retention of existing car park to provide 61 nos. car parking spaces (for 96 staff, equivalent to 0.6 space per staff; including the approved 12 staff car

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parking spaces under planning permission No. 2157/APP/2023/3068). A vehicle access would be provided at the northeastern corner of the site along Harmondsworth Lane and a drop-off point would be provided in front of Aviation House. These vehicle access and drop-off arrangement would be like that of the approved Aviation House scheme.

- 7.30 The applicant has advised that most of the pupils would arrive and depart from the school via organised, supervised transport predominantly in the form of local authority-arranged minibuses and taxis. Drop-off and pick-up times would be managed and staggered to ensure safe and orderly arrival and departure, with staff present to assist pupils from vehicles into the school building and vice versa. For other pupils who travel to and from the school on foot/ cycle, a separate pedestrian entrance and waiting / drop off area would be provided at the northwestern corner of the site on Holloway Lane to separate them from vehicular traffic.
- 7.31 Under the approved Aviation House scheme, a three-metre-wide footpath providing segregated pedestrian and cycle access from Holloway Lane to Aviation House along the side (west) of The Lodge and Annex would be provided but has not been implemented to date nor included under the current proposal. The applicant has advised that the footpath is no longer required due to the comprehensive masterplan under the current application. Wheelchair access would still be available through the pedestrian entrance between the Lodge and the Annex. The width of such entrance would be 1.84m and is considered sufficient for all users.
- 7.32 As stated in Section 6 above, the Highway Authority (HA) has objected on the proposal based on its car parking levels and the lack of sustainable transport mitigation.
- 7.33 The applicant has provided a Transport assessment under the original submission and subsequently submitted a draft Travel Plan, a Responses-to-Highways Comments note and a supporting letter from the school operator to clarify the operational and parking needs, in response to the HA's objection.
- 7.34 It is noted that the approved Aviation House scheme (under planning permission No. 2157/APP/2023/3068) had proposed 0.4 parking space per staff (with 12 car parking spaces for approximately 30 members of staff) whilst 25 spaces out of the pre-existing 89 car parking spaces had been removed to facilitate the approved play space. Therefore, in the existing car park, there are 64 car parking spaces, with the 12 allocated to the Aviation House scheme and 52 retained for the existing office use.
- 7.35 The supporting letter from the school operator has advised that the proposed SEND secondary school operation at The Lodge and Annex would require approximately 15 specialist staff. Specialist staff with this combination of SEND expertise and secondary subject knowledge are in very limited supply. The recruitment pool is necessarily drawn from a wide geographical area, and these staff members are expected to travel to work by car from greater distances.

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Therefore, approximately 25 of the car parking spaces would be allocated/ reserved for specialist staff (15 spaces) and occasional overflow for training events (10 spaces). The remaining 36 car parking spaces serve approximately 81 standard (non-specialist) members of staff, producing a car-to-staff travel ratio of approximately 0.4, consistent with the approved and consented scheme at Aviation House.

- 7.36 In absence of a specific parking standard for SEND school under the Hillingdon Local Plan Part 2 and the London Plan, the officers have referred to comparable planning applications at Grangewood School, Fore Street, Eastcote (Ref: 2145/APP/2022/3534), Moorcroft School, Bramble Close, Hillingdon (Ref: 49008/APP/2020/1069) and Barra Hall, Wood End Green Road, Hayes (Ref: 8134/APP/2025/404).
- 7.37 At Moorcroft School, the car parking spaces to staff ratio was 1.02, at Grangewood School 0.85, and at Barra Hall 0.96. As such, having taken comparable applications into consideration car parking spaces proposed under the current application, with a parking to staff ratio of 0.6 is considered acceptable if supported by a robust Travel Plan.
- 7.38 The submitted draft Travel Plan has included some overarching principles to promote sustainable transport mode. Whilst detailed measures to achieve these principles and monitor/ review mechanism are not available in the submitted document, the officers have recommended conditions for submission and approval of revised and strengthened Travel Plan and Car Parking Management Plan, which is an opportunity to monitor the level of parking required and provided.
- 7.39 While the position taken by the HA is understood it is clear from a wider assessment, including comparable schemes, that the development as proposed would not present a significant departure from policy. There is an overarching aim to reduce car dependency and use, however in low PTAL areas such as 1b it is generally accepted that there would need to be a higher dependency on vehicle use to travel to and from the development site. Moreover, the submission includes evidence that supports a high ratio of parking as being required. Officers do not consider there to be a specific policy basis to refuse the application on the grounds of an over-provision of parking that would be defensible at appeal, particularly when Policy DMT 6 states standards should be “on an individual basis using a transport assessment and (where applicable) a school travel plan / travel plan.” In this case there is robust justification for the proposed quantum and conditions are proposed to monitor parking requirements on site to enable a reduction in parking quantum where feasible.
- 7.40 Officers understand that that there is a wider aspiration to reduce car dependency broadly set out in the London Plan, however the site is located within an area with very low sustainable transport options and proposes a change of use which supports children with special education needs.

- 7.41 Subject to the recommended conditions, the proposal is considered on the whole to comply with Policies T4, T5, and T6 of The London Plan and Policy DMT 6 of Hillingdon Council's Local Plan Part Two Development Management Policies.

Air Quality

- 7.42 The application site is in an Air Quality Management Area (Hillingdon AQMA). London Plan Policy SI1 requires development proposals to tackle poor air quality, protect health and meet legal obligations, including ensuring proposals do not lead to further deterioration of existing poor air quality and are at least Air Quality Neutral where applicable. These aims are reflected locally in Hillingdon Local Plan Part 1 Policy EM8 and Hillingdon Local Plan Part 2 Policy DMEI 14, which require development to avoid unacceptable risk from air pollution to sensitive receptors and, as a minimum, be air quality neutral and include appropriate mitigation, particularly within the AQMA.
- 7.43 The applicant submitted an Air Quality Assessment and subsequent technical clarification. During preparation of the committee report, the operational traffic assumptions were revisited alongside the transport evidence. A revised modal split and trip estimate has since been agreed with the Highway Authority, including a more cautious assumption for staff car travel informed by the average mode split for people working in the borough.
- 7.44 The additional information has been reviewed by the Air Quality Officer who has agreed with the adjustment to the modal split and raises no objection. As such, subject to conditions pertaining to dust management, the proposal is considered acceptable in air quality terms and compliant with NPPF 2026 Policy P3, London Plan Policy SI1, Local Plan Part 1 Policy EM8 and Local Plan Part 2 Policy DMEI 14.

Biodiversity Net Gain

- 7.45 Biodiversity net gain is a way of creating and improving biodiversity by requiring development to have a positive impact ('net gain') on biodiversity.
- 7.46 In England, Biodiversity Net Gain (BNG) is mandatory under Schedule 7A of the Town and Country Planning Act 1990 (as inserted by Schedule 14 of the Environment Act 2021). It became mandatory for major developments on 12 February 2024 and small sites on 2 April 2024. Developers must deliver a BNG of at least 10%. This means a development will result in more or better-quality natural habitat than there was before development. The land owner is legally responsible for creating or enhancing the habitat and managing that habitat for at least 30 years to achieve the target condition. The NPPF states that planning decisions should contribute to and enhance the natural and local environment by minimising impacts on and providing net gains for biodiversity.
- 7.47 In the BNG section of the application form that the applicant has suggested that the development is subject to the de minimis exemption. As shown on the existing and proposed landscape plans and as confirmed by the applicant, no existing

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habitat would be removed. The proposal would not affect more than 25sqm of 'onsite habitat that has biodiversity value greater than zero'.

- 7.48 On this basis, it is considered that the development would fall under the de minimis exemption.

Tree and Landscaping

- 7.49 London Plan Policy G5 seeks to secure urban greening as a fundamental element of site and building design, including high-quality landscaping, and supports the use of the Urban Greening Factor (UGF) as a measure to achieve this. London Plan Policy G7 also seeks to ensure that existing trees of value are retained wherever possible.
- 7.50 As per the submitted Arboricultural Impact Assessment, 1no. formally maintained tree group (G38) and 1no. buddleja shrub (S36) only, which in BS5837 terms are Category C (i.e., low-quality) would be removed due to their poor current condition. The proposed removal is considered unlikely to significantly impact the overall condition of the existing trees within the application site. Three proposed new trees would be planted in the landscaped area within the car park.
- 7.51 The applicant proposes an UGF of 0.44, which exceeds Policy G5 of The London Plan.
- 7.52 Subject to conditions ensuring protection of trees and implementation of UGF measures, the proposal would comply with Policy G5 of The London Plan and Policy DMHB 14 of Hillingdon Council's Local Plan Part Two Development Management Policies. Appropriate conditions have attached.

Archaeology

- 7.53 NPPF (2026) Policy HE5(5) requires an appropriate desk-based assessment and, where necessary, field evaluation where a proposal involves, or has the potential to involve, a heritage asset with archaeological interest. Policy HE10 further states that archaeological assets should be preserved in situ where feasible, with appropriate investigation, recording, dissemination and archiving where on-site preservation is not possible. London Plan Policy HC1 requires development affecting heritage assets (including archaeology) to conserve significance and, where relevant, make provision for the protection and investigation/recording of archaeological remains. At local level, Hillingdon Local Plan Part 2 Policy DMHB 7 seeks to ensure that sites of archaeological interest are not disturbed; where disturbance cannot be avoided, it requires appropriate archaeological investigation, recording, archiving and reporting secured through suitable measures. The key consideration is therefore whether the proposal would result in ground disturbance with potential to harm archaeological remains, and if so, whether proportionate assessment and mitigation is required.
- 7.54 The site is within the Heathrow and Harmondsworth Archaeological Priority Areas. Historic England's Greater London Archaeological Advisory Panel (GLAAS)

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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.'

- 7.55 The application is mainly for a change of use. Minor dig works are limited to landscape alterations. As such, it would be smaller in scale than a typical householder application. Hillingdon Council does not yet have APA tiers, and the site is not within 50 metres of a scheduled monument. Therefore, it is not referable to the GLAAS. Notwithstanding this point, GLAAS were consulted but to date no comments have been received. As groundworks are minimal and the scheme does not meet the threshold for GLAAS assessment and comment, it is considered acceptable in the context of Policies HE5 and HE10 of the NPPF, Policy HC1 of the London Plan, and Policy DMHB 7 of Hillingdon Council's Local Plan Part Two.

Accessibility

- 7.56 Policy D5 of the London Plan (2021) (Inclusive Design) seeks to ensure that development is designed to be inclusive and accessible to all users.
- 7.57 Design amendments have been made to the proposal to allow wheelchair access into the proposed school. The proposal has been reviewed by the Council's Accessibility Officer who has consider this proposal to have no impact on accessibility. Therefore, the development is therefore considered to comply with Policy D5 of the London Plan (2021).

Flooding and Drainage

- 7.58 NPPF (2026) Policies F4 to F8 require flood risk from all sources to be considered and development to remain safe throughout its lifetime without increasing flood risk elsewhere. London Plan Policies SI12 and SI13 and Hillingdon Local Plan Part 2 Policy DMEI 10 similarly require development to minimise flood risk, manage surface-water runoff appropriately and incorporate sustainable drainage measures in accordance with the drainage hierarchy.
- 7.59 The application site is not located within Flood Zone 2 or Flood Zone 3 and is therefore at low risk of fluvial flooding. Whilst a small area in front of the eastern elevation of The Lodge lies within an area identified as being at risk of surface water flooding.
- 7.60 It is noted that the proposed SEND school would be a more vulnerable form of development in flood risk terms than the existing office use, but the area with risk of surface water flooding is limited in extent and does not coincide with the external play / amenity areas where a future pupil might stay for a prolonged period of time. No additional building footprint, material increase in impermeable surfacing or alteration to site levels is proposed. The submitted Flood Risk Assessment concludes that the development would remain safe throughout its lifetime and would not increase flood risk elsewhere. The assessment also proposes drainage

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betterment within areas of external works, including permeable surfacing, granular sub-base storage and rain-garden planting.

- 7.61 Having regard to the limited extent of the surface water risk area, the location of the main pupil activity areas elsewhere within the site, and the absence of additional built form in the affected area, the proposal is considered acceptable in flood risk and drainage terms subject to a condition for sustainable drainage measures.

Land Contamination

- 7.62 The application site is identified as Potentially Contaminated Land. Hillingdon Local Plan Part 2 Policy DME1 12 requires development on land affected by contamination to ensure that risks to human health, property and the wider environment are appropriately assessed and remediated.
- 7.63 A Land Contamination Assessment has been submitted. The Council's Land Contamination Officer raises no objection to the proposal subject to a condition to secure the recommended contamination assessment/mitigation measures (as applicable), to ensure the site is suitable for the proposed use. This condition is recommended to be attached, should the application be determined for approval.

8 Other Matters

Human Rights

- 8.1 The development has been assessed against the provisions of the Human Rights Act, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. This Act gives further effect to the rights included in the European Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests / the Development Plan and Central Government Guidance.

Equality

- 8.2 Due consideration has been given to Section 149 of the Equality Act with regard to the Public Sector Equality Duty in the assessment of this planning application. No adverse equality impacts are considered to arise from the proposal.

Local Finance Considerations and CIL

- 8.3 Not applicable. The proposed development is not CIL liable.

9 Conclusion / Planning Balance

- 9.1 The proposed change of use to a SEND school is acceptable in principle. The minor external works would preserve the character and significance of the listed building and conservation area and would not harm Green Belt openness.
- 9.2 The Highway Authority maintains an objection regarding parking levels and sustainable transport mitigation. Officers consider that, in the context of the low PTAL, the operational characteristics of SEND provision and comparable schemes, the parking provision can be accepted subject to conditions securing a robust Travel Plan and a Car Parking Management Plan, together with controls on pupil and staff numbers.
- 9.3 The proposal is considered to comply with the Development Plan when read as a whole and no material considerations indicate that a contrary decision should be taken. The application is recommended for approval subject to the conditions set out in Appendix 1 and a Section 106 legal agreement to secure the recommended obligations.

10 Background Papers

- 10.1 Relevant published policies and documents taken into account in respect of this application are set out in the report. Documents associated with the application (except exempt or confidential information) are available on the [Council's website here](#), by entering the planning application number at the top of this report and using the search facility. Planning applications are also available to inspect electronically at the Civic Centre, High Street, Uxbridge, UB8 1UW upon appointment, by contacting Planning Services at planning@hillington.gov.uk.
- 10.2 This report has been prepared with reference to the background papers listed below, which have been relied upon to a material extent in its preparation and are available for public inspection, subject to any necessary redaction for exempt or confidential information.
- 10.3 Internal Consultee Comments:
- Contaminated Land Officer
 - Access Officer
 - Noise Officer
 - Air Quality Officer
 - Highways Officer
 - Planning Policy Officer
 - Conservation Officer
 - Waste Officer
 - School Place Planning and Policy Manager
- 10.4 External Consultee Comments:
- Harmondsworth Conservation Area Advisory Panel

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APPENDICES

Planning Application

2157/APP/2025/2060

Appendix 1: Recommended Conditions and Informatives

Conditions

1. COM3 Time Limit

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON

To comply with Section 91 of the Town and Country Planning Act 1990.

2. COM4 Accordance with Approved Plans

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers:

745-CDA-ZZ-ZZ-DR-A-00-0100-REV 02-Site Location Plan
745-CDA-X-ZZ-DR-A-05-0406-REV 01-Proposed Section-The Lodge West Entrance
745-CDA-X-ZZ-DR-A-05-0111-REV 05-Proposed Landscape Plan
745-CDA-X-ZZ-DR-A-05-0407-REV 01-Proposed Section - The Annex Main Entrance Lobby
745-CDA-2-00-DR-A-05-0100-REV 05-Proposed Ground Floor Plan - The Annex
745-CDA-2-01-DR-A-05-0101-REV 04-Proposed First Floor Plan - The Annex
745-CDA-2-02-DR-A-05-0102-REV 02-Proposed Roof Plan - The Annex
745-CDA-1-B1-DR-A-05-0099-REV 04-Proposed Lower Ground Floor - The Lodge
745-CDA-1-00-DR-A-05-0100-REV 04-Proposed Ground Floor Plan - The Lodge
745-CDA-1-01-DR-A-05-0101-REV 02-Proposed First Floor Plan - The Lodge
745-CDA-1-02-DR-A-05-0102-REV 02-Proposed Roof Plan - The Lodge
745-CDA-X-ZZ-DR-A-10-0099-REV 02- Proposed Lower Ground Floor Block Plan
745-CDA-X-ZZ-DR-A-10-0100-REV 03- Proposed Ground Floor Block Plan
745-CDA-X-ZZ-DR-A-10-0101-REV 03-Proposed First Floor Block Plan
745-CDA-1-02-DR-A-05-0102-REV 02-Proposed Roof Floor Plan
745-CDA-1-ZZ-DR-A-05-0200-REV 02-Proposed North Elevation
745-CDA-1-ZZ-DR-A-05-0201-REV 02-Proposed East Elevation
745-CDA-1-ZZ-DR-A-05-0202-REV 02-Proposed South Elevation
745-CDA-1-ZZ-DR-A-05-0203-REV 02-Proposed West Elevation
745-CDA-2-00-DR-A-05-0100-REV 02-Proposed Ground Floor Plan
745-CDA-2-02-DR-A-05-0102-REV 02-Proposed Roof Plan
745-CDA-2-ZZ-DR-A-05-0200-REV 02-Proposed North Elevation
745-CDA-2-ZZ-DR-A-05-0201-REV 02-Proposed East Elevation
745-CDA-2-ZZ-DR-A-05-0202-REV 02-Proposed South Elevation
745-CDA-2-ZZ-DR-A-05-0203-REV 02-Proposed West Elevation
745-CDA-2-ZZ-DR-A-05-0204-REV 02-Proposed North Inner Elevation
745-CDA-2-ZZ-DR-A-05-0205-REV 02-Proposed East Inner Elevation
745-CDA-2-ZZ-DR-A-05-0206-REV 02-Proposed South Inner Elevation

and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions of The London Plan (2021) and Hillingdon Local Plan Parts 1 (2012) and 2 (2020).

3. COM5 General compliance with supporting documentation

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted documents, references:

Fire Statement prepared by Apex Strategies;
Heritage Statement prepared by Cogent Heritage;
Transport Statement prepared by Kronen Ltd;
Noise Impact Assessment prepared by Syntegra Group;
BREEAM Pre-Assessment prepared by Syntegra Group;
Air Quality Assessment prepared by Syntegra Group;
Flood Risk Assessment and Sustainable Urban Drainage Strategy by Syntegra Group;
Arboriculture Impact Assessment prepared by TMA Environmental Consultants;
Phase 1 Desktop Study and Preliminary Risk Assessment Report (3x Parts) by GeoSmart Information Ltd;
Covering Letter-Supporting Letter-Travel Plan

Thereafter the development shall be retained/maintained in accordance with these details for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions of The London Plan (2021) and Hillingdon Local Plan Parts 1 (2012) and 2 (2020).

4. NONSC Electric vehicle charging

Three 7Kw active electric vehicle charging point and one 7kw passive electric vehicle charging point, prior to the first use of the development hereby approved. The four electric vehicle charging points shall thereafter be retained as such, unless upgrading the passive electric vehicle charging point to an active electric vehicle charging point.

REASON

To ensure the development complies with the provisions of Policy T6 of The London Plan (2021).

5. NONSC Travel Plan

Prior to occupation of the development hereby permitted, a Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Travel Plan, as submitted shall follow the current Travel Plan Development Control Guidance issued by Transport for London and will include:

- (1) targets for sustainable travel arrangements;
- (2) effective measures for the ongoing monitoring of the Travel Plan;
- (3) a commitment to delivering the Travel Plan objectives; and
- (4) effective mechanisms to achieve the objectives of the Travel Plan by both present and future occupiers of the development.

The development shall be implemented only in accordance with the approved Travel Plan.

REASON

To promote sustainable transport and reduce the impact of the development on the surrounding road network in accordance with Policies DMT 1, DMT 4 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Policies T2, T4 and T6 of the London Plan (2021).

6. NONSC Parking Design and Management Plan

Prior to occupation of the development hereby permitted, a Car Parking Management Plan shall be submitted to and approved in writing by the Local Planning Authority. It shall include the arrangements for all on-site parking, including provisions for managing, monitoring, enforcement and review.

The vehicle parking provision and its management, as outlined in the approved Car Parking Management Plan, shall be fully implemented prior to the first occupation of the development, and so maintained in good working order, and the parking spaces shall not be used for any other purpose for the lifetime of the development.

REASON

To ensure the appropriate operation of the car parking spaces and to ensure that the proposed development provides adequate facilities in accordance with Policies DMT 1, DMT 2 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Policy T6 of the London Plan (2021).

7. NONSC Pupil and staff restrictions

The total number of pupils attending the school hereby approved shall not exceed 128 pupils and the number of school staff shall not exceed 99 employees.

REASON

To prevent the generation of additional traffic that could give rise to problems of safety and congestion on the surrounding roads and to comply with Policy T4 of The London Plan (2021) and Policies DMT 1, DMT 2, and DMT6 of the Hillingdon Local Plan Part 2 - Development Management Policies (2020).

8. NONSC Cycle parking

30 long-stay cycle parking spaces and 6 short-stay cycle parking spaces shall be installed and available for use in accordance with approved plans and the London Cycle Design Standards prior to the first use of the development hereby approved. The cycle parking shall thereafter be retained for the lifetime of the school development.

REASON

To ensure the development complies with the provisions of Policy T5 of The London Plan (2021).

9. NONSC Tree Protection

Prior to commencement of development (including ground works and site clearance) an Arboricultural Method Statement shall be submitted to and approved by the Local Planning Authority.

All protection measures must detail each phase of the development process, considering site clearance works, all construction works and hard and soft landscaping works. Details shall include the following:

- Full survey of all trees on site and those within influencing distance on adjacent sites in accordance with BS5837*, with tree works proposals. All trees must be plotted on a site plan**, clearly and accurately depicting trunk locations, root protection areas and canopy spreads;
- A plan** detailing all trees and hedgerows planned for retention and removal;
- A schedule of tree works for all the retained trees specifying pruning and other remedial or preventative work, whether for physiological, hazard abatement, aesthetic, or operational reasons. All tree works shall be carried out in accordance with BS 3998;
- Soil assessments/survey;
- Timing and phasing of works;
- Site specific demolition and hard surface removal specifications;
- Site specific construction specifications (e.g. in connection with foundations, bridging, water features, surfacing);
- Access arrangements and car parking;
- Level changes;
- Landscaping proposals;
- A Tree protection plan** in accordance with BS5837* detailing all methods of protection, including but not restricted to: locations of construction exclusion zones, root protection areas, fit for purpose fencing and ground protection, service routes, works access space, material/machinery/waste storage and permanent & temporary hard surfaces;
- Soil remediation plans, where unauthorised access has damaged root protection areas in the construction exclusion zones;
- Details of the arboricultural supervision schedule.

All tree protection methods detailed in the approved Arboricultural Method Statement shall

be installed prior to commencement of development (including ground works and site clearance) and not be moved or removed, temporarily or otherwise, until all works including external works have been completed and all equipment, machinery, and surplus materials have been removed from the site.

Any trees, shrubs, or hedges removed without consent, die, are severely damaged or become seriously diseased within five years from the completion of the approved development, shall be replaced with trees, shrubs, or hedges capable of achieving comparable quantity and quality.

*Using the most recent revision the of the Standard

**Plans must be of a minimum scale of 1:200 (unless otherwise agreed by the Local Planning Authority)

REASON

To ensure appropriate urban greening and tree protection in accordance with Policies G5 and G7 of The London Plan.

10. NONSC **Tree Monitoring**

(a) Prior to the commencement of development (including ground works and site clearance), the following shall be submitted to and approved by the Local Planning Authority:

A Tree Monitoring Plan to include:

- Confirmation of who shall be the lead arboriculturalist for the development;
- Confirmation of the Site Manager, key personnel, their key responsibilities and contact details;
- Details of induction procedures for all personnel in relation to arboricultural matters;
- A detailed timetable of events for arboricultural supervision concerning all tree protection measures within the approved Tree Protection Plan, including:
 - Initial implementation/installation of the tree protection measures;
- Approved incursions into construction exclusion zones;
- Final removal of the tree protection measures;
- Procedures for dealing with non-approved incursions into the construction exclusion zones as detailed in the approved arboricultural plans and reports.

(b) Within three months of first use of the development hereby approved, a report containing the following details shall be submitted to and approved by the Local Planning Authority:

- Results of each site visit by the lead arboriculturist with photos attached.
- Assessment of the retained and planted trees, including any necessary remedial action because of damage incurred during construction.

REASON

To ensure appropriate urban greening and tree protection in accordance with Policies G5 and G7 of The London Plan.

11. NONSC Urban Greening Factor

(a) Approved Urban Greening Factor and landscaping measures (drawing references: 745-CDA-X-ZZ-DR-A-05-1112-REV 01-UGF Plan which achieves an Urban Greening Factor score of 0.44 shall be implemented in the nearest planting season (1 October to 28 February inclusive) following first use of the approved development.

(b) Within six months of implementation of Urban Greening Factor measures, details of onsite green infrastructure shall be submitted to and approved by the Local Planning Authority to verify the UGF score of 0.44 has been attained.

The approved Urban Greening Factor measure to achieve a score of 0.44 shall permanently be maintained as such thereafter.

REASON

To ensure appropriate levels of high-quality landscaping and urban greening measures are provided in accordance with Policy G5 of The London Plan.

12. NONSC Land Contamination

(i) The development shall not commence until a scheme to deal with contamination has been submitted to and approved by the Local Planning Authority (LPA). All works which form part of any required remediation scheme shall be completed before any part of the development is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(a) A site investigation, including where relevant soil, soil gas, surface water and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly identify all risks, limitations, and recommendations for remedial measures to make the site suitable for the proposed use; and

(b) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement, along with the details of a watching brief to address undiscovered contamination. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.

(ii) If during remedial or development works contamination not addressed in the submitted remediation scheme is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to

show that the works have been carried out in full and in accordance with the approved methodology.

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping and/or engineering purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the factual results and interpretive reports of this testing shall be submitted to and approved in writing by the Local Planning Authority.

REASON

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

13. RES15 Sustainable Water Management (changed from SUDS)

Prior to the first occupation of the development as a school, the sustainable drainage measures shown on the approved landscaping plans and identified in the Flood Risk Assessment and SuDS report prepared by Syntegra Consulting Ltd, reference 23-11821, dated July 2025, shall be fully implemented. These measures shall include the permeable surfacing, associated granular sub-base storage and rain-garden planting within the areas of external works.

Prior to first occupation, details of the arrangements for the management, inspection and maintenance of the sustainable drainage measures shall be submitted to and approved in writing by the Local Planning Authority. The approved drainage measures shall thereafter be retained and maintained in accordance with the approved details for the lifetime of the development.

REASON

To ensure that surface-water runoff is appropriately managed, that the development does not increase flood risk on or off the site, and that the sustainable drainage measures remain effective throughout the lifetime of the development, in accordance with Policies F7 and F8 of the National Planning Policy Framework 2026, Policies SI12 and SI13 of the London Plan and Policy DMEI 10 of the Hillingdon Local Plan Part 2.

14. NONSC Non Standard Condition

No development shall commence until a Plan has been submitted to, and approved in writing by, the LPA. This must demonstrate compliance (drawn up accordance with) the GLA Control of Dust and Emissions from Construction and Demolition SPG (or any successor document).

REASON:

Compliance with London Plan Policy SI 1 and in accordance with Mayor of London "The Non-road mobile machinery (standard condition recommended by Mayor of London, London Local Air Quality Management Policy Guidance 2019)

15. NONSC Non Standard Condition

All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up-to-date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>."

REASON:

Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy

Informatives

1. I44A Prevention of Litter

You should ensure that your premises do not generate litter in the streets and nearby areas. Sections 93 and 94 of the Environmental Protection Act 1990 give local authorities the power to serve 'Street Litter Control Notices' requiring businesses to clear up the litter and implement measures to prevent the land from becoming littered again. By imposing a 'Street Litter Control Notice', the local authority has the power to force businesses to clean up the area in the vicinity of their premises, provide and empty bins and do anything else which may be necessary to remove litter. Amendments made to the 1990 Act by the Clean Neighbourhoods and Environment Act 2005 have made it immediately an offence to fail to comply with the requirements of a Street Litter Control Notice, and fixed penalties may be issued as an alternative to prosecution.

Given the requirements of the Clean Neighbourhoods and Environment Act 2005, you are advised to take part in Defra's Voluntary Code of Practice for 'Reducing litter caused by Food on the Go', published in November 2004.

Should you have any queries on the above, please contact the Environmental Enforcement Team within the Environment and Consumer Protection Group on 01895 277402 at the London Borough of Hillingdon.

2. I47 Damage to Verge - For Council Roads:

The Council will recover from the applicant the cost of highway and footway repairs, including damage to grass verges.

Care should be taken during the building works hereby approved to ensure no damage occurs to the verge or footpaths during construction. Vehicles delivering materials to this development shall not override or cause damage to the public footway. Any damage will require to be made good to the satisfaction of the Council and at the applicant's expense.

For further information and advice contact - Highways Maintenance Operations, Central Depot - Block K, Harlington Road Depot, 128 Harlington Road, Hillingdon, Middlesex, UB3 3EU (Tel: 01895 277524).

For Private Roads: Care should be taken during the building works hereby approved to ensure no damage occurs to the verge of footpaths on private roads during construction. Vehicles delivering materials to this development shall not override or cause damage to a private road and where possible alternative routes should be taken to avoid private roads. The applicant may be required to make good any damage caused.

3. I25 Consent for the Display of Adverts and Illuminated Signs

This permission does not authorise the display of advertisements or signs, separate consent for which may be required under the Town and Country Planning (Control of Advertisements) Regulations 1992. . For further information and advice, contact - Residents Services, 3N/04, Civic Centre, High Street, Uxbridge, UB8 1UW (Tel. 01895 250574).

4. I15 Control of Environmental Nuisance from Construction Work

Nuisance from demolition and construction works is subject to control under The Control of Pollution Act 1974, the Clean Air Acts and other related legislation. In particular, you should ensure that the following are complied with:-

A. Demolition and construction works which are audible at the site boundary shall only be carried out between the hours of 08.00 and 18.00 hours Monday to Friday and between the hours of 08.00 hours and 13.00 hours on Saturday. No works shall be carried out on Sundays, Bank or Public Holidays.

B. All noise generated during such works shall be controlled in compliance with British Standard Code of Practice BS 5228:2009.

C. Dust emissions shall be controlled in compliance with the Mayor of London's Best Practice Guidance 'The Control of dust and emissions from construction and demolition.

D. No bonfires that create dark smoke or nuisance to local residents.

You are advised to consult the Council's Environmental Protection Unit (www.hillingdon.gov.uk/noise Tel. 01895 250155) or to seek prior approval under Section 61 of the Control of Pollution Act if you anticipate any difficulty in carrying out construction other than within the normal working hours set out in (A) above, and by means that would minimise disturbance to adjoining premises.

5.

Fixtures, fittings and furnishings, particularly hard materials are selected to ensure that sound is not adversely reflected. The design of all learning areas should be considerate to the needs of people who are hard of hearing or deaf. Reference should be made to BS 8300:2018, and BS 8233:2014 in selecting an appropriate acoustic absorbency for each surface.

6.

Care is taken to ensure that the internal decoration achieves a Light Reflectance Value (LRV) difference of at least 30 points between floor and walls, ceiling and walls, Including appropriate decor to ensure that doors and door furniture can be easily located by people with reduced vision.

7.

Induction loops are specified to comply with BS 7594 and BS EN 60118-4, and a term contract planned for their maintenance. Care is taken to ensure that overspill and/or other interference from induction loops- in different/adjacent areas- does not occur.

8.

Flashing beacons/strobe lights linked to the fire alarm are carefully selected and installed to ensure they remain within the technical thresholds not to adversely affect people with epilepsy.

9.

The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.

Appendix 2: Relevant Planning History

2157/APP/2023/3068 The Lodge Aviation House Harmondsworth Lane Harmondsworth
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

Decision: 18-04-2024 Approved

2157/APP/2024/1768 The Lodge Harmondsworth Lane Harmondsworth
Details pursuant to the discharge of Condition 9 (Arboricultural Method Statement) of planning permission reference 157/APP/2023/3068, dated 18-04-2024, for the '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.'

Decision: 29-08-2024 Approved

2157/APP/2024/1769 The Lodge Harmondsworth Lane Harmondsworth
Details pursuant to the discharge of Condition 5 (electric vehicle charging) of planning permission reference 2157/APP/2023/3068, dated 18-04-2024, for the '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.'

Decision: 29-08-2024 Approved

2157/APP/2024/1772 The Lodge Harmondsworth Lane Harmondsworth
Details pursuant to the partial discharge of Condition 10 (Part A) (Tree Monitoring Plan) of planning permission reference 2157/APP/2023/3068, dated 18-04-2024, for the '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.'

Decision: 29-08-2024 Approved

2157/APP/2024/2256 The Lodge Harmondsworth Lane Harmondsworth
Details pursuant to the discharge of Conditions 4 (Path details) of planning permission ref. 2157/APP/2023/3068, dated 18-04-24 (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)

Decision: 14-10-2024 Approved

2157/APP/2024/2792 The Lodge Harmondsworth Lane Harmondsworth

Details pursuant to the discharge of Condition 6 (Parking Design and Management Plan) of planning permission reference 2157/APP/2023/3068, dated 18.04.2024, for the '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.'

Decision: 16-12-2024 Approved

2157/APP/2025/2058 The Lodge Harmondsworth Lane Harmondsworth

Alterations to The Lodge (Listed Building Entry No: 1080217) including, demolition of unoriginal internal walls, construction of internal walls and doors, replacement kitchen, balustrade on the roof terrace, replacement WCs, and replacement of a window to be fire rated on the south elevation as well as other decorative minor alterations (Application for Listed Building Consent).

Decision: 13-05-2026 Approved

2157/APP/2025/326 The Lodge Harmondsworth Lane Harmondsworth

Variation of Condition 4 (pathway details) of planning permission reference 2157/APP/2023/3068, dated 18-04-24, for the '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'. Variation seeking to remove the time constraint for implementation of the footpath/cycle path.

Decision: 28-03-2025 Refused

Appendix 3: List of Relevant Planning Policies

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

PT1.BE1	(2012) Built Environment
PT1.CI1	(2012) Community Infrastructure Provision
PT1.EM2	(2012) Green Belt, Metropolitan Open Land and Green Chains
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.HE1	(2012) Heritage

Part 2 Policies:

LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP G2	(2021) London's Green Belt
LPP HC1	(2021) Heritage conservation and growth
LPP S3	(2021) Education and childcare facilities
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.5	(2021) Non-residential disabled persons parking
DMEI 12	Development of Land Affected by Contamination
DMEI 4	Development on the Green Belt or Metropolitan Open Land
DMHB 11	Design of New Development

DMHB 2	Listed Buildings
DMHB 4	Conservation Areas
DMHB 7	Archaeological Priority Areas and archaeological Priority Zones
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking