

LADY NAFISA SCHOOL FOR GIRLS
INGLENOOK
SIPSON LANE, WEST DRAYTON

Transport Statement

On behalf of

HA MEEM FOUNDATION

August 2021 / Version 1.1



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1. Introduction

- 1.1 Catalyst TP has been instructed by the Ha Meem Foundation to provide a Transport Statement to support a Variation of Condition under Section 73 of the Town and Country Planning Act 1990 of the Appeal Decision under reference number APP/R5510/C/18/3213390, for retrospective planning consent relating to the installation of two portacabins at Lady Nafisa Independent Secondary School for Girls, situated on Sipson Lane, West Drayton, UB7 0JG. The Application is for an increase in maximum pupils from 60 to 80. The strategic site location is shown as **Figure 01**, whilst the boundary and local context is included as **Figure 02**. The site layout is included as **Appendix A**.
- 1.2 This Transport Statement provides a brief review of planning policy, a description of the site and its surrounds, assesses walking and cycling infrastructure and accessibility to public transport and local amenities, and addresses site-specific transport-related matters, with particular reference to trip generation and parking.

THE APPLICATION

- 1.3 The development comprises a converted house and two portable cabins (portacabins) which have been installed in the north-east part of the wider school site, as shown on **Appendix A**. These are reached via the main school building. The portacabins will each provide an additional classroom to accommodate a proposed increase in pupils from 60 to 80. It is not anticipated that additional staff will be required to service the increase.
- 1.4 The developed is complemented by the provision of a newly laid-out car park which accommodates seven vehicles, one of which is designated for disabled drivers. Two proposed Sheffield stands will provide parking for four visitor cycles.

THE SCHOOL

- 1.5 The school is an independent day school for Muslim girls aged 11 to 16, years 7-11. There are six full-time staff, and seven part-time staff. Physical education is undertaken off-site. The school day begins at 08:15 and finishes at 15:00.
- 1.6 Outside of standard school hours, a homework club takes place once a week, finishing at 16:15 (currently five pupils), and afterschool detentions occasionally take place. Otherwise there are no regular after-school activities. All vehicular movements associated with the school are undertaken during term-time; there are no holiday activities which take place at the school.

- 1.7 Delivery, service, and visitor traffic movements are minimal, taking place between school start and finish times.

PLANNING HISTORY

- 1.8 The application site was, until 2018, a nursery school accommodating 40 pupils. This was converted to its current status as a secondary school for 60 pupils in 2018. The two portacabins were erected with a view to increasing the number of pupils to 80 in that year, the retrospective application (number 26758/APP/2018/1405) for which was refused in June 2018 on the grounds of three matters, of which the third was as follows:

“The application has failed to provide an accurate assessment of the transportation and parking impacts associated with the proposed development including trip generation, swept paths, car parking, coach parking, loading/unloading and servicing and as such fails to demonstrate that it would not be detrimental to highway and pedestrian safety and the free flow of traffic contrary to policies AM2, AM7 and AM14 of the Hillingdon Local Plan: Part Two – Saved UDP Policies (November 2012), and Policies 6.3 and 6.13 of the London Plan (2016)”

- 1.9 An Enforcement Notice was issued in September 2018, in which the reason for enforcement included at d) stated:

“The increase in the capacity of the School by providing two additional classrooms results in increased traffic generation and parking on a residential street which is detrimental to highway and pedestrian safety and the free flow of traffic contrary to policies AM2, AM7 and AM14 of the Hillingdon Local Plan: Part Two – Saved UDP Policies (November 2012), and Policies 6.3 and 6.13 of the London Plan (2016)”

- 1.10 An Appeal was subsequently lodged against refusal of consent, the Decision for which was published in 15th August 2019. The Inspector had few concerns regarding traffic and highways matters and the Decision granted the Appeal, with Conditions, of which the first stipulated *“The number of pupils at the school shall not exceed 60 at any one time.”* The Appeal Decision is contained at **Appendix B**.
- 1.11 Condition 3 (i) stated *“Within 3 months of the date of this decision a scheme for parking and turning within the site shall have been submitted for the written approval of the local planning authority and the scheme shall include a timetable for its implementation.”* This Condition has been discharged following the submission and subsequent approval of a revised parking layout with provision for turning within the curtilage of the site. Discharge of Condition 3 (i) Decision Notice is included as **Appendix C**.

- 1.12 This Transport Statement supports the application for a Variation of Condition 1) of the Appeal to change the maximum number of pupils from 60 to 80.
- 1.13 This document has been produced with reference to national and local planning policy documents (see **Chapter 2**) and through consultation with the highways officer of Hillingdon Council, correspondence related to which is included at **Appendix D**.
- 1.14 A School Travel Plan accompanies this document which seeks to minimise the number of car-borne journeys to and from the school.

2. National and Local Policy

2.1 The relevant policies informing transport as related to the application site are as follows:

- National Planning Policy Framework (2019)
- London Plan (2021)
- Mayor's Transport Strategy (2018)
- Transport for London Guidance (2021)
- Hillingdon Local Plan Part 1 Strategic Policies (2012)
- Hillingdon Local Plan Part 2 Development Management Policies (2015)

NATIONAL PLANNING POLICY FRAMEWORK (2019)

2.2 This document is an over-arching policy which provides reference for nationwide development, and to which all local policies should adhere. It was last updated in February 2019. The document emphasises that, in planning decisions, there should be a presumption in favour of sustainable development.

2.3 Chapter 19 of the NPPF relates to sustainable travel, and states that, in considering transport matters associated with development proposals:

- “a) the potential impacts of development on transport networks can be addressed;*
- b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
- c) opportunities to promote walking, cycling and public transport use and identified and pursued;*
- d) the environmental impacts of traffic and transport infrastructure can be identified, assessed, and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains; and*
- e) patterns of movement, streets, parking and other transport considerations are integral to the design of schemes, and contribute to making high quality places.”*

2.4 In terms of assessing transport for specific sites, the NPPF goes on to stipulate that it should be ensure that:

- a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*
- b) safe and suitable access to the site can be achieved for all users; and*
- c) any significant impacts from the development on the transport network (in terms of*

capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.”

The NPPF 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 network would be severe.”*

It goes on to state that applications for development should:

- “a) give priority first to pedestrian and cycle movements, both within the scheme and with neighbouring areas; and second - so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus and other public transport services, and appropriate facilities that encourage public transport use;*
- b) address the needs of people with disabilities and reduced mobility in relation to all modes of transport;*
- c) create places that are safe, secure and attractive – which minimise the scope for conflicts between pedestrians, cycles and vehicles, avoid unnecessary street clutter, and respond to local character and design standards;*
- d) allow for the efficient delivery of goods, and access by service and emergency vehicles in safe, accessible and convenient locations; and*
- e) be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”*

- 2.5 In summary, therefore, and in terms of transport in particular, the NPPF emphasises the need to promote sustainable development and address safety considerations.

LONDON PLAN (2021)

- 2.6 The latest revision of the London Plan was adopted in March 2021, and sets out the vision for planning in the capital, with a view to achieving zero carbon in 2050 and, in terms of transport, to achieve a target of 80% of all trips within the city being made by foot, cycle or public transport by 2041.
- 2.7 Chapter 10 of this document refers specifically to transport. Within this, Policy T4 sets out how transport impacts should be assessed and mitigated, as follows:

- A Development Plans and development proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.*
- B When required in accordance with national and local guidance, transport assessments/statements should be submitted with development proposals to ensure*

that impacts on the capacity of the transport network (including impacts on pedestrians and the cycle network), at the local, network-wide and strategic level, are fully assessed. Transport assessments should focus on embedding the Healthy Streets Approach within, and within the vicinity of, new development. Travel Plans, Parking Design and Management Plans, Construction and Logistics Plans and Delivery and Servicing Plans will be required having regard to Transport for London Guidance.

- C Where appropriate, mitigation, either through direct provision of public transport, walking and cycling facilities and highways improvements or through financial contributions, will be required to address adverse transport impacts that are identified.*
- D Where the ability to absorb increased travel demand through active travel modes has been exhausted, existing public transport capacity is insufficient to allow for the travel generated by the proposed developments, and no firm plans and funding exist for an increase in capacity to cater for the increased demand, planning permission will be contingent on the provision of necessary public transport and active travel infrastructure.*
- E The cumulative impacts of development on public transport and the road network capacity including walking and cycling, as well as associated effects on public health, should be taken into account and mitigated.*
- F Development proposals should not increase road danger.”*

2.8 The London Plan sets out car and cycle parking standards which will be discussed in **Chapter 7.**

MAYOR’S TRANSPORT STRATEGY (2018)

- 2.9 The Mayor’s Transport Strategy uses the ‘Healthy Streets Approach’ which prioritises health and personal experience for travel. The Healthy Streets Approach means improving the public realm and public transport to promote the use of sustainable modes of travel, with an emphasis on reducing pollution and maximising health benefits of walking and cycling.
- 2.10 The Strategy comprises a number of plans. The Walking Action Plan aims to make London the world’s most walkable city by increasing walking trips to more than one million a day by 2024. The Vision Zero Action Plan aims to eliminate all deaths and serious injury on London’s transport system. The Freight and Servicing Action Plan is designed to maximise

safe, clean and efficient freight movements in the city, whilst the Cycling Action Plan aims to break down barriers to cycling in London.

TRANSPORT FOR LONDON GUIDANCE

- 2.11 Transport for London (TfL) produces a number of guidance documents relating to various forms of transport and types of development. Relevant to schools, TfL have produced a range of free programmes which help pupils to become involved with reducing the need to travel by car, and also offer travel and safety guidance.
- 2.12 TfL have produced a new document entitled 'Transport Land Guidance' (pre-consultation draft). This document sets out how land should be safeguarded for various transport projects, but also advises developers on how to provide for sustainable transport modes. With regard to development, the Guidance states that layouts should prioritise walking and cycling, and should consider connectivity to public transport.

HILLINGDON LOCAL PLAN PART 1

- 2.13 The Hillingdon Local Plan includes, at Chapter 9, Core Policies – Transport and Infrastructure. The aims of the policies are to improve quality of life and reduce dependency on the private car. One of its Strategic Objectives is to *“Reduce reliance on the use of the car by promoting safe and sustainable modes of transport, such as improving walking and cycling routes and encouraging Travel Plans.”*
- 2.14 Another transport-related objective is to improve access to local facilities, including education.
- 2.15 The Plan states that new development should encourage access by sustainable modes of transport and promote active travel. This will be achieved through the implementation of Travel Plans.

HILLINGDON LOCAL PLAN PART 2

- 2.16 The second part of the Local Plan deals with Development Management Policies, where Chapter 8 addresses Transport and Aviation.
- 2.17 In this chapter it is stated that new development will be required to be adequately managed such that it does not contribute to an increase in pollution, congestion and noise.
- 2.18 Part 2 states that Transport Assessments/Statements will be required to support development proposals to ensure that any transport issues can be addressed, and that Travel Plans should follow the Guidelines produced by TfL.

2.19 At Policy DMT1, the Local Plan Part 2 states:

“A) Development proposals will be required to meet the needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable, they are required to:

- i) be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers and visitors from and/or the services and facilities necessary to support the development;*
- ii) maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users;*
- iii) provide equal access for all people, including inclusive access for disabled people;*
- iv) adequately address delivery, servicing and drop-off requirements; and*
- v) have no significant adverse transport and associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.*

B) Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds. All major development that fall below these thresholds will be required to produce a satisfactory Transport Statement and Local Level Travel Plan. All these plans should demonstrate how any potential impacts will be mitigated and how such measures will be implemented.”

2.20 The Plan Part 2 states that development should provide measures which do not contribute to the existing traffic problems, and preferably help to reduce car usage. With regard to public transport, the Borough requires that bus stops be conveniently located for passengers. Suitable connectivity for pedestrians and cyclists should be provided.

3. Site Context

Development Site Context

- 3.1 The site is approximately 0.1 hectares is area comprising a converted house, a small car park of seven spaces, and outside recreation areas. Two portacabins are located in the north-east part of the site.
- 3.2 To the south of the school there are nine free local authority-owned car parking spaces.
- 3.3 The school is sited to the north of Sipson Lane at its western end, about 80m from the junction of Sipson Lane with the A408. It lies to just to the north of a council-owned parking area, situated off Vineries Close, whose junction with Sipson Lane takes the form of a simple priority arrangement.
- 3.4 Sipson Lane is largely semi-rural in character although, in the vicinity of the site, it becomes residential in nature. It is provided with speed cushions in this location, and parking is permitted on both sides of the carriageway. The road is street-lit, and is subject to a 30mph speed limit. Sipson Lane is furnished with footways on both sides of the carriageway between the site and the A408, which it joins at a mini-roundabout junction.
- 3.5 A footway continues on the northern side of Sipson Lane to the east of the school where it crosses the M4 motorway via a bridge. From here, it continues for 1.2km until its roundabout junction with the A437, High Street, in Harlington.
- 3.6 The A408, which is residential in nature, connects to Holloway Lane to the north, which provides access to Junction 4 of the M4 motorway, approximately 1.6km from the site. To the south, the A408 links with the A4, Bath Road, about 1.1km from the site.

4. Walking and Cycling

- 4.1 Sipson Lane is provided with footways on both sides of the carriageway within the vicinity of the site, and these continue in both directions along the A408. A pedestrian crossing is situated on the A408 about 100m north of its junction with Sipson Lane.
- 4.2 Harlington lies 1.4km from the site, representing a 17-minute walk. Harlington itself offers a range of retail outlets and eateries, providing options for staff at lunchtime which can be accessed on foot.
- 4.3 There is a hard-surfaced Public Right of Way (PROW) (no. H68) linking Sipson Lane with the periphery of Harlington's residential area 600m from the site, offering a route to the school for staff and pupils in this area.
- 4.4 Sipson Lane is a relatively quiet road, providing opportunities for visitors to cycle to and from the school from the surrounding residential areas of Sipson Road (A408) and Harlington. The A4 offers on-road cycle lanes in both directions providing cycle links to Hounslow and Brands Hill/Langley, each route taking approximately half an hour.
- 4.5 A Pedestrian Audit has been undertaken between the school and the nearest pair of bus stops on Sipson Road, which is included as **Appendix E**. This demonstrates that the walking environment is satisfactory, and that there are no significant impediments to this mode, thus facilitating the use of bus travel to and from the school (see **Section 5**).
- 4.6 It may be concluded that the site is accessible by foot and by cycle.

5. Public Transport

- 5.1 The development site lies in a PTAL area of 1b, which reflects poor public transport provision. However, although there is only one service which stops near the school, it is highly frequent and has a large catchment area.
- 5.2 Bus stops are situated on the A408 Sipson Road, of which the nearest southbound stop is 120m from the site and its corresponding northbound stop is 270m distant. The former stop is in the form of a pole and flag, with a bus time-table provided; whilst the latter is equipped with seating, a shelter and timetables.
- 5.3 A Pedestrian Audit has been undertaken between the school and the nearest pair of bus stops on Sipson Road, which is included as **Appendix E**. This demonstrates that the walking environment is satisfactory, and that there are no significant impediments to this mode, thus facilitating the use of bus travel to and from the school.
- 5.4 Each of these stops serve the number 222 bus which runs between Uxbridge and Hounslow every 9-12 minutes in each direction, stopping at Cowley, West Drayton, and Harlington. This route serves a corridor of residential development, offering a highly frequent service for both pupils and staff, and catering for the mobility-impaired.
- 5.5 The nearest railway stations to the site are West Drayton and Hayes and Harlington, which are a 35-minute and a 44-minute walk from the site respectively. Although Heathrow is served by tube, it is not accessible on foot.
- 5.6 It is concluded, therefore, that the site is well-served by bus, although train and tube do not offer viable options for travel to the school at this time.

6. Parking and Servicing

CAR PARKING

- 6.1 A new parking layout has been provided for the school, offering seven car parking spaces which include a space for disabled drivers. This is shown on the proposed site layout at **Appendix A**.
- 6.2 Hillingdon Local Plan refers to the London Plan in respect of car parking for all development other than residential or B1 use. With reference to the London Plan, specific car parking` standards are not provided for educational development. However, the London Plan states at 10.6.5 that *‘Where no standard is provided, the level of parking should be determined on a case-by-case basis, taking account of Policy T6 Car Parking, current and future PTAL, and wider measures of public transport, walking and cycling connectivity.’*
- 6.3 It has been demonstrated that, operationally, only seven of the staff currently drive to work. These data were collected by the school and are reproduced in **Table 6-1**. The maximum demand at any one time for staff car parking is therefore seven spaces.

Table 6-1

	Car driver	Passenger	Bus	Walk
Monday	7	1		
Tuesday	6	2		
Wednesday	6	2		1
Thursday	6	1		
Friday	7			

- 6.4 On the basis of this data, a car park was designed to accommodate these seven spaces, including one disabled space. The new car park replaces the former unmarked, informal parking area. The new car park layout has been approved by officers of Hillingdon Council, as Discharge of Condition 3 (i) of the Appeal Decision.
- 6.5 Although a rare occurrence, should parking demand at the school exceed the spaces provided, there are on-street parking spaces on The Vineries to accommodate any overspill, including the council-owned rank of spaces opposite the school entrance.
- 6.6 To determine whether or not the school-related traffic adversely affects the available on-street parking, a Parking Survey was undertaken during term-time on Thursday, 22nd July 2021 on all roads within 200m of the school. This included:

1. The school car park
2. Council parking spaces and school approach
3. The Vineries (whole length)
4. Sipson Lane from the school to 50m beyond the motorway bridge to the east
5. Sipson Lane from the school to the junction of Sipson Lane with Sipson Road
6. Sipson Road, between Sipson Lane and Harmondsworth Lane
7. Sipson Road, between Sipson Lane and Hollycroft Gardens
8. Track adjacent to 363 Sipson Road

The times at which the parking occupancy at each of these locations was recorded were as follows:

- 08:00 (before school starts)
- 08:15 (as school starts)
- 08:30 (after school has begun)
- 14:30 (before school closes)
- 15:00 (as school closes)

These times were chosen to reflect the times at which the movements were expected to be the busiest compared with those without school traffic. The full results of the parking survey are contained at **Appendix F**.

6.7 Parking restrictions occur in the following locations:

- Sipson Lane/Sipson Road junction : double yellow lines 10m from the junction along all roads on both sides except on the southbound side of Sipson Road (S) where a parking bay has been provided 5.75m from the junction
- Sipson Road/Harmondsworth Lane junction : double yellow lines on the northern arm, and the extents of the standard restrictions associated with zebra crossings on the southern and western arms, 30m on each arm
- Sipson Road (N) : Single yellow lines on both sides of the carriageway between the restrictions at each of the two junctions referred to above
- Sipson Road (S) : Single yellow lines on the northbound (western) side of the carriageway between Hollycroft Gardens and Sipson Lane

6.8 On-street parking availability was calculated from the lengths of road where parking is permitted, allowing 6m per vehicle. It was assumed in all cases that parking was available on one side of the road only whether or not restrictions were present on one side of the road.

Table 6-2 summarises the results for the whole survey area which accommodates a total of 104 spaces. There were no illegally parked vehicles.

Table 6-2 Parking occupancy by time of day (total)

Time	Spaces occupied	Free spaces	% occupied
08:00	58	46	56%
08:10	60	44	58%
08:30	63	41	61%
14:30	47	57	45%
15:00	71	33	69%

- 6.9 It can be seen that at no time does the occupancy of the total available parking spaces exceed 69%, with a minimum of 33 spare parking spaces at any given time. This is the worst case scenario at a time when it is expected that drivers are waiting for pupils to emerge from the school at the end of the day. The morning scenario is less onerous as drivers only pause to drop off staff or students.
- 6.10 Comparing 'no school traffic' at 14:30 and 'with school traffic' at 15:00, space occupancy briefly increases from 47 vehicles to 71 vehicles, an increase of 38 vehicles. However, not all vehicles will be associated with the school, especially those parking on Sipson Road close to the shops. Parents and carers will park as close to the school as they can if spaces are available, rather than 200m distant.
- 6.11 Focussing on the afternoon scenarios, **Table 6-3** shows the increase in parking between 14:30 and 15:00 at the various locations.

Table 6-3 Increase in pm occupancy at each location

Section of network within 200m of school	14:30	15:00	Increase
The school car park	7	10	3
Council parking spaces and school approach	5	11	6
The Vineries (whole length)	7	17	10
Sipson Lane to 50m beyond m'way bridge	15	15	0
Sipson Lane to junction with Sipson Road	3	5	2
Sipson Rd, Sipson Lane to Harmondsworth Lane	0	0	0
Sipson Rd, between Sipson Ln and Hollycroft Gdns	9	13	4
Track adjacent to 363 Sipson Road	1	0	-1

- 6.12 The above table shows that the increase in vehicles is generally concentrated in and around the school, including The Vineries. With a further nine spaces available on this road at this time, it is unlikely that any increases elsewhere on the survey network can be attributed to school-related traffic since there is spare parking availability on The Vineries closer to the school.
- 6.13 At present the adjacent 'Grow Heathrow' site is occupied by around 20 people protesting the proposed Heathrow runway, and there is an ongoing case to evict the occupants. When this comes about, further parking spaces are likely to become available on The Vineries and within the council-owned spaces just to the south of the school.

CYCLE PARKING

- 6.14 With respect to cycle parking, the Hillingdon Local Plan states that cycle parking should be in accordance with the London Plan. **Table 6-4** shows the minimum cycle parking standards, where the school accommodates six full-time staff, seven part-time staff, and a proposed total of 80 students.

Table 6-4 Cycle Parking Standards - Minimum

London Plan Standards		Required Provision	
Long Stay	Short Stay	Long Stay	Short Stay
1 space per 8 FTE staff		2	
1 space per 8 students	1 space per 100 students	10	1
Total		12	1

According to the London Plan cycle parking standards, therefore, a total of 13 cycle parking spaces would need to be provided.

- 6.15 However, officers of Hillingdon Council have acknowledged that, due to the full-length dress that all staff and pupils wear to and from the school, cycling would not be a safe option. It was therefore agreed that four cycle spaces be provided within the car park for visitors, in the form of two Sheffield stands.

DROP-OFF/PICK-UP AND SERVICING

- 6.16 An area to accommodate vehicles stopping and turning has been provided within the curtilage of the school in order to provide a safe space in which students can be delivered and collected. This area also accommodates visitors and servicing vehicles, none larger than standard vans, delivering goods to the school.

- 6.17 Refuse collections will be undertaken as at present, with kerbside collections once a week.

CONCLUSIONS

- 6.11 It is concluded that car parking, cycle parking, deliveries, and refuse collection arrangements are all satisfactory.

7. Trip Generation and Modal Split

- 7.1 The school has undertaken a survey of its staff and pupils to determine the mode of transport they use to get to and from the school, thus deriving site-specific trip generation and modal split. The survey was conducted in 2018 and, although a repeat survey was undertaken in June 2021, it was within the Covid-19 pandemic and, thus, may show atypical results. However, the 2021 survey showed very similar results, albeit one member of staff now walks to the school. The 2018 survey to which this Section refers, and which can be considered as a 'snap-shot' (verified on the ground by a highways officer of Hillingdon Council) was carried out using a 'hands-up' methodology for each class.
- 7.2 The results of the survey are shown as **Table 7-1**.

Table 7-1 Trip to school by mode

Mode	Pupils		Staff		Total	
	Arrive	Depart	Arrive	Depart	Arrive	Depart
Car	0	0	7	7	7	7
Car passenger	22	22	4	3	26	25
Bus	38	38	1	2	39	40
Cycle	0	0	0	0	0	0
Walk	0	0	0	0	0	0
Total	60	60	12	12	72	72

TRIP GENERATION

- 7.3 Extracting data from the above survey results, the vehicular trip generation is as shown in **Table 7-2**. All trips as car passengers are additional to the car trips undertaken as drivers.

Table 7-2 Vehicular Trips

Mode	Pupils		Staff		Total	
	Arrive	Depart	Arrive	Depart	Arrive	Depart
Car	0	0	7	7	7	7
Car passenger	22	22	4	3	26	25
Total	22	22	11	10	33	32

- 7.4 **Table 7-3** shows the current and expected development peak hour vehicular movements. These trips arrive and depart during each peak hour, whereas those trips undertaken as driver arrive in the morning peak and depart in the evening peak. Whilst the am peak

coincides with the network peak, the pm peak for the school occurs in the afternoon at 15:00. Since it is not proposed to increase staff numbers, trips will increase with respect to pupil pick-up/drop-off car movements only. It is to be noted that some part-time staff do not attend on all days of the week, therefore the figures below are robust.

Table 7-3 Vehicular Trips

	Car trips – 60 pupils				Additional pupil trips				Car trips – 80 pupils			
	am		pm		am		pm		am		pm	
	Arr	Dep	Arr	Dep	Arr	Dep	Arr	Dep	Arr	Dep	Arr	Dep
Car	7	0	0	7	0	0	0	0	7	0	0	7
Car passenger	26	26	25	25	7	7	7	7	33	33	32	32
Total	33	26	25	32	7	7	7	7	40	33	32	39

- 7.5 It can be seen from the table above that trips to and from the school in each peak hour will increase by seven, representing a proportional increase in pupil trips by 33%. The overall average increase in car trips is 24.5%.
- 7.6 Sipson Road (A408) has average annual traffic flows of around 12,000 vehicles. Estimating a peak hour flow of 8%, this gives a peak hour flow of around 960 vehicles. Therefore, it is not expected that the increase in the number of vehicular trips will have an adverse effect on the local highway network. Inspection of morning peak hour queueing on the network via Google Maps shows that there is at present free-flow traffic on the approaches to the junction of Sipson Lane with Sipson Road.

MODAL SPLIT

- 7.7 Using results of the survey as tabulated in **Table 7-1**, modal splits for 60 and 80 pupils have been derived as shown in **Table 7-4**, taking account of zero increase in staff car journeys. The expected increase in pupil bus journeys is 13, whilst those undertaken by staff remain as at present. The tables below assume that all staff attend the school every day, although part-time staff do not work the whole week.

Table 7-4 Modal Split

Mode	Trips – 60 pupils		Trips – 80 pupils		Predicted Modal Split	
	Arrive	Depart	Arrive	Depart	Arrive	Depart
Car	7	7	7	7	7.61%	7.61%
Car passenger	26	25	33	32	35.87%	34.78%
Bus	39	40	52	53	56.52%	57.61%
Cycle	0	0	0	0	0%	0%
Walk	0	0	0	0	0%	0%
Total	72	72	92	92	100%	100%

- 7.8 It can be seen that, whilst no pupils or staff are expected to travel to school by bicycle or on foot, around 57% of all trips to the school will be by bus. The remaining 43% are likely to be undertaken by car.
- 7.9 It is concluded that any increases in car journeys due to an increase in pupils from 60 to 80 will be minimal.

8. Summary and Conclusions

- 8.1 This Transport Statement has been produced to support a Section 73 Variation of Condition Application for two portacabins to accommodate an increase in pupil numbers from 60 to 80 at Lady Nafisa School for Girls.
- 8.2 National and local policy have been considered, in which sustainability is the predominant element, together with safety.
- 8.3 The site associated with the Application was described in the context of the local highway network.
- 8.4 Walking and cycling opportunities were described, where it was concluded that infrastructure in the locality was sufficient to support any trips to the school undertaken by these modes.
- 8.5 Public transport was assessed, identifying a single bus route which serves the school. However, this route has a large residential catchment area and runs every 9 to 12 minutes and is therefore, for the purposes of the school, considered good provision. A separate Walking Audit was undertaken between the school and the nearest pair of bus stops which confirmed that there is a suitable route to facilitate bus use. There are no railway stations or underground stations within reasonable walking distance of the site.
- 8.6 The newly-designed parking layout, which has been approved by officers of Hillingdon Council, comprises seven spaces of which one is designated for disabled drivers. It accommodates the staff who are expected to drive to the school. A turning area has been provided to cater for school pick-up and drop-off, and to provide waiting for service vehicles. Refuse collection will continue as it does at present.
- 8.7 The current and anticipated number of trips by mode were derived from a survey undertaken by the school, the total number of vehicular trips associated with the proposals being 40 arrivals and 33 departures in the morning peak, and 32 arrivals and 39 departures in the afternoon peak. This represents a total increase in vehicular traffic of seven vehicles in each direction during each peak hour. It is not considered that this will impact significantly on the local highway network.
- 8.8 The predicted modal split was calculated using the school's survey data, which showed that approximately 57% of school-related trips will be by bus, and the remainder by car.
- 8.9 It is concluded that, whilst there is a 33% increase in the number of pupils, the numbers are small when translated into car-borne trips. It is considered, therefore, that there is no reason

in transport or traffic terms, why the proposals should not be recommended for approval of planning consent.

FIGURES

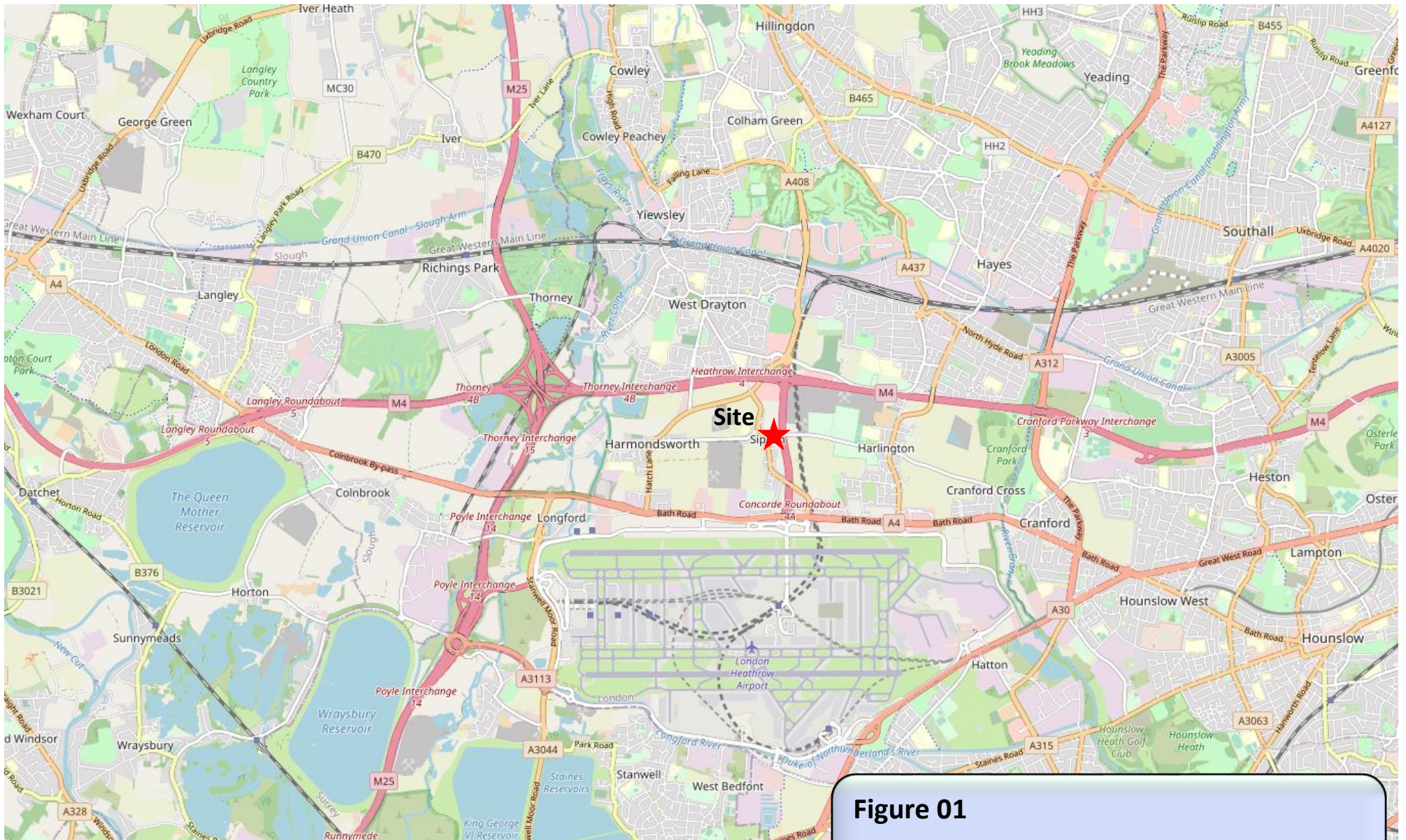


Figure 01
Site Location - Strategic



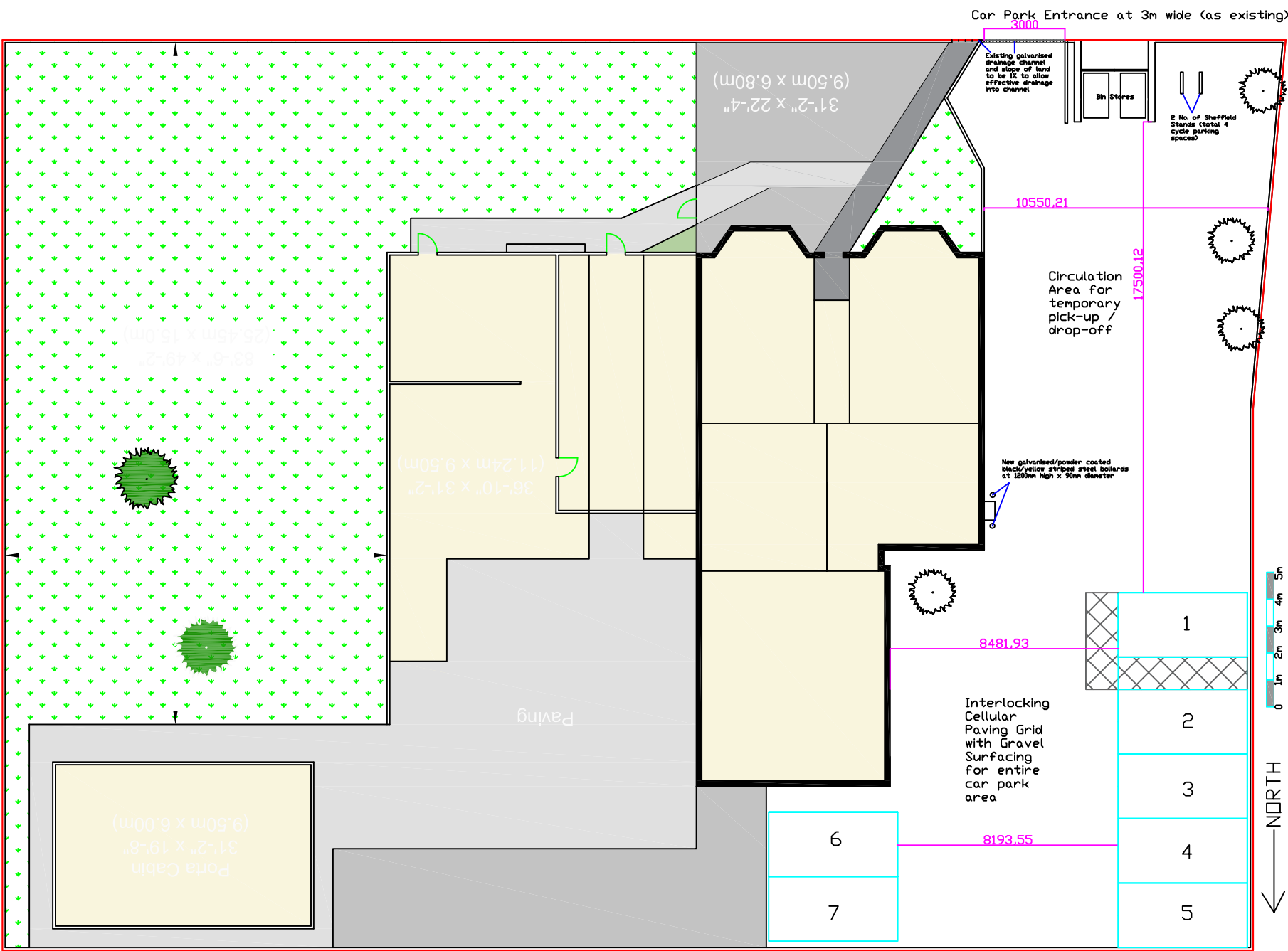
Figure 02

Site Location - Local

APPENDICES

APPENDIX A

SITE LAYOUT



				Project:	
				Lady Nafisa School, Inglenook, Sipson Lane, UB7 0JG	
				Title:	
				Existing Site Plan	
	Date: 05/08/21	Scale: 1:200@A3	Rev: -	Drawing No: LNS/2021/03	
Job Ref: -	Drawn: BC	Checked: BC			

APPENDIX B

APPEAL DECISION NOTICE



Appeal Decision

Hearing Held on 9 July 2019

Site visit made on 9 July 2019

by Andy Harwood CMS MSc MRTPI

an Inspector appointed by the Secretary of State

Decision date: 15 August 2019

Appeal Ref: APP/R5510/C/18/3213390

Inglenook, Sipson Lane, Sipson, West Drayton, Middlesex UB7 0JG

- The appeal is made under section 174 of the Town and Country Planning Act 1990 as amended by the Planning and Compensation Act 1991.
 - The appeal is made by Ha Meem Foundation against an enforcement notice issued by the Council of the London Borough of Hillingdon.
 - The enforcement notice was issued on 6 September 2018.
 - The breach of planning control as alleged in the notice is without planning permission the installation of 2 portable cabins ("the breach").
 - The requirements of the notice are:
 - i. remove the 2 portable cabins from the land as shown in the approximate position hatched in blue on the plan attached;
 - ii. remove from the land all debris, waste, building materials, plant equipment and machinery resulting from the removal of the portable cabins.
 - The period for compliance with the requirements is 3 months.
 - The appeal is proceeding on the grounds set out in section 174(2)(a) of the Town and Country Planning Act 1990 as amended.
-

Decision

1. The appeal is allowed, the enforcement notice is quashed and planning permission is granted on the application deemed to have been made under section 177(5) of the 1990 Act as amended for the development already carried out, namely the installation of 2 portable cabins at Inglenook, Sipson Lane, Sipson, West Drayton, Middlesex UB7 0JG as shown on the plan attached to the notice and subject to the conditions set out in the schedule below.

Preliminary Matters

2. At the beginning of the hearing the Mr Volley for the Council asked if consideration could be given to limiting the numbers of school pupils within the portable cabins to 20. However, my powers to consider changing the notice through this appeal are limited even if such a revision to incorporate a limitation like that could be achieved through an enforcement notice. My powers to alter a notice are very limited to where they relate to the grounds of appeal or if correcting a defect, when it would not cause injustice.
3. The initial appeal statement on behalf of the appellants said that it was proposed to only use the portable cabins until 21 December 2020. This is the point at which the break clause within the lease of the property could be invoked. However, the appellants would prefer to stay beyond that date and for the proposal to be considered on a permanent basis.

The Appeal on ground (a) and the Deemed Planning Application

4. It is agreed between the parties that the 2 portable cabins are buildings and I agree. These buildings have been placed at the rear of the main school building and they contain 2 classrooms.
5. The main issues are:-
 - Whether the matter as alleged is inappropriate development in the GB having regard to the revised Framework and relevant development plan policies, including the effects on openness;
 - The effect on the purposes of including land in the GB;
 - The effects on the character and appearance of the area;
 - The effect of the development on highway and pedestrian safety;
 - If the development is inappropriate development, whether the harm by reason of inappropriateness, and any other harm, would be clearly outweighed by other considerations. If so, would this amount to the very special circumstances required to justify the proposal.

Green Belt Planning policies

6. The London Plan (LP) was adopted prior to the publication of the latest version of the National Planning Policy Framework (the Framework). However, Policy 7.16 refers to the need to give protection of the Green Belt from inappropriate development. It goes on to state that this should be in accordance with national guidance. Local Plan: Part One Strategic Policies (SP) adopted November 2012 Policy EM2 requires all proposals for development in the Green Belt to be assessed against national and LP Policies. These policies are therefore consistent with the framework.
7. London Borough of Hillingdon Unitary Development Plan which was adopted in 1998 but saved on 27 September 2007, (UDP) Policies OL1 and OL4 are expressed in very different terms to the Framework and are inconsistent with it. Mr Volley for the Council considered that more weight should be given to the Framework rather than these policies.
8. Given the above I will consider the appeal on the basis of the policies in the Framework and those policies that are consistent with it.

Reasons – whether inappropriate development

9. The appeal site includes a large 2-storey traditional building with a short front garden, larger open area to western side where parking is available. On the other side of the building, there is an area which is used as an outside play space which is also partially enclosed. Beyond that is an open area beneath the canopy of trees and the 2 portable cabins are in the north-east corner. Along the northern boundary there is a close boarded timber fence and around the eastern boundary, there is a wire mesh fence.
10. Paragraph 145 of the Framework states that the construction of new buildings should be regarded as inappropriate development in the Green Belt. There are however some exceptions and in this case, I am directed to sub-paragraph (g) which excludes from being inappropriate development:

“limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings) which would:

- Not have a greater impact on the openness of the Green Belt than the existing development”

The second bullet point to sub-paragraph (g) is not applicable as it relates to developments making a contribution housing needs.

11. Although with respect to paragraph 145 it is necessary to consider whether redevelopment of “previously developed land” is involved, that is only the case if the development would not “have a greater impact on openness”. I will therefore look first at openness.
12. The appellant has referred to various legal authorities regarding the matter of how to consider the effect of a development upon openness. Particular reliance is given to the Euro Garages case¹ and at the hearing, the basic implications of this case were discussed. Not only the spatial but also the visual aspects of openness need to be considered and rather than treating any change as having a greater impact on openness of the Green Belt, the correct approach is to consider the impact or harm, if any, wrought by the change. This and other judgements are reflected in the recent update to the Planning Practice Guidance² (PPG). Both main parties have been given an opportunity to consider this update to the PPG since the hearing was closed. Whether or not any change will have an adverse impact and so cause harm to openness, might depend on factors such as the scale of the development, its locational context and its spatial as well as visual implications.
13. It was agreed at the hearing that no buildings were on the site of the cabins before they were installed although the land around them has been used as a children’s’ play area which may include use of some moveable play equipment similar to what I saw on the site close to the main school building. Although enclosed, the lack of buildings on this part of the site previously provided an open setting for the school building on the edge of the settlement within the margins between built up area and less development rural areas.
14. The 2 portable cabins protrude considerably above the surface of the land. Due to their size and bulk, they have taken up a substantial volume of space that had previously not contained any buildings. This additional amount of built development leads to a loss of openness in spatial terms. This has created a more developed setting to the school building therefore harming the previous openness of this site in the sensitive urban fringe of Sipson.
15. The school building and front boundary hedge along the back edge of the highway leading to the site, which is a no through road, prevents all but limited glimpses into the site from that direction. From within the site, I could see over the timber fence and into the land on the northern side of the site which is covered in vegetation and lines of mature trees. I could see a large boat and other paraphernalia to the north which the Council confirmed is subject to enforcement investigations. The land to the east was difficult to see through the mesh of the fence due to the density of vegetation on that adjoining land.

¹ Euro Garages Ltd v SOS & Cheshire West and Chester Council [2018] EWHC 1753 (Admin)

² Paragraph: 001 Reference ID: 64-001-20190722, revision date 22 July 2019

16. Even though they are dark green in colour, the cabins will still be noticeable from the adjoining land due to their protrusion above the level of the timber fence and to a more limited extent through the mesh of the fence along other boundaries. The loss of openness is apparent and not just in terms of a change in the environment of the site itself but also due to the position of the buildings on the margins of the settlement and visibility from outside of the site from that adjoining land. This greater amount of development on the site has a limited but nevertheless harmful impact upon openness of the area both in spatial and visual terms. The development therefore has had a greater impact which causes a moderate degree of harm to the openness of the Green Belt than the previous lack of built development on the site.
17. I am required to give substantial weight to any harm to the Green Belt. Even if the site could be considered to be previously developed land, it is inappropriate development as it does not fall within any of the exceptions within paragraph 145 of the Framework. In accordance with the Framework and therefore LP Policy 7.16 and SP Policy EM2, the development should not be approved except in very special circumstances. Very special circumstances will not exist unless the harm to the Green Belt by reason of inappropriateness and any other harm is clearly outweighed by other considerations.

The effect on the purposes of the Green Belt

18. The construction of the substantial buildings has caused a greater urbanisation of this site which is noticeable from adjoining land. This creates a further protrusion of urban development. As such, the development goes against the purposes of checking unrestricted sprawl of large built up areas and also failing to safeguard the countryside from encroachment.

Character and appearance

19. The appeal site is on the margins of the building up area of Sipson and more rural surroundings. The site is within the Harlington Open Gravel Terrace as defined within the Council's Landscape Character Assessment. This defines the area as a flat, open landscape predominantly with large scale open fields of arable farmland. The site relates more to the settlement than the adjoining rural area and does not directly contribute to these rural characteristics. The buildings have flat roofs although the dark green colour helps them to visually recede.
20. Although noticeable from adjoining land, the cabins have a very limited impact upon the broader landscape or surrounding built environment. The buildings are within the grounds of the school and have a utilitarian appearance that is not unusual with school buildings in my experience. The development maintains the quality of the built environment, is not visible from the street-scene and generally harmonises with and compliments the character of the area. The cabins are close to a large tree which is the subject of a Tree Preservation Order but which also helps to soften the impact of the buildings. The Council is not concerned about the effect of the development upon the health and lifespan of that tree and I have no evidence to suggest that the development has been harmful in those respects.
21. In relation to this main issue, the proposal does not have a harmful impact upon the character and appearance of the surrounding area. This complies with SP Policies BE1 as well as UDP Policies BE13 and BE19.

Highway and pedestrian safety

22. The appeal site is located alongside a spur off-of Vineries Close although the address is Sipson Lane which is the main road linking Sipson with Harlington. This spur is a no through road for vehicular traffic where a footpath through to what I was told is private land has a barrier across to prevent entry by vehicles. There is some space for parking and turning in front of the school but this cannot be ensured to be available by school related traffic as it is outside of the ownership of the appellant.
23. The junction of the main part of Sipson Lane with Vineries Close includes good visibility in both directions. I saw vehicles parked alongside the carriageway of the main road that did not appear to affect the safety of vehicles driving along that road or turning into Vineries Close. Vehicles were parked close to the junction with Vineries Close but again, these did not affect highway safety at that time.
24. The Council considers that the numbers of pupils attending the school can be limited to a maximum of 40. The appellants refer to the current number of pupils as being 60. That number of pupils is the basis for the modal split survey provided which the Council's highway witness confirmed had made a difference to his view of the highway issues when the appeal documents were exchanged (although that officer refers to 57 pupils). That officer has carried out site visits during school pick-up and drop-off times and considered that his objection could be withdrawn subject to the school entering into an active school travel plan. It was not clear to me from what was discussed what the travel plan would need to include or how it could be enforced but the suggested condition also related to the physical layout of the access and turning area. I return to that below.
25. There are limitations in the width of the turning area as well as parking spaces outside of the site as well as that within the school grounds. There is no defined footpath leading to the site. Pedestrians will inevitably be walking close to turning vehicles when parents are dropping off and picking up their children. This will happen to an extent whether or not this development is allowed but with a greater number of pupils, there is more chance of problems occurring. On the other hand, there is no evidence about specific incidents that have occurred due to this number of pupils attending the school since the classrooms have been operational including during the Council's highway officer's visits.
26. Ofsted have indicated that the school is suitable for up to 80 pupils but their considerations do not include an analysis of the planning merits. I have insufficient evidence before me to demonstrate that up to 80 pupils can be accommodated without harmful impacts upon the surrounding highway network. The evidence that I do have however indicates that the situation when the evidence was compiled was reasonably safe and heard no evidence to convince me otherwise. I encouraged debate at the hearing regarding whether I could attach a condition relating to overall numbers of pupils as suggested by the Council. I consider that given the unauthorised development is within the same planning unit as the school, doing so would be relevant to the development under consideration. The numbers of pupils overall will have an impact upon highway conditions and it would be reasonable and necessary to provide an enforceable limitation.

27. There is a parking area within the school grounds which is informally laid out. I agree with the Council's suggestion that the increase in pupil numbers at the school makes it necessary to ensure the layout is organised to make parking and turning within the site as effective and as safe as possible. This is a matter that can be subject to a planning condition to ensure the submission of a suitable layout and alteration of the access, for agreement by the Council. I do not consider that the other highway related conditions suggested by the Council are necessary.
28. In relation to this main issue, with these safeguards the development does not have a harmful effect on highway and pedestrian safety. This does not therefore conflict with LP Policies 6.3 and 6.13 UDP or Policies AM2, AM7 and AM14.

Other considerations

29. It was explained at the hearing that the school would not be viable without the 2 classrooms provided within the cabins. Removing these would result in the loss of at least 12 pupils. Even if the school were able to stay open in spite of the resultant loss of income, it would no longer be possible to offer education to GCSE level. This would cause substantial disruption to all of the pupils, particularly those in their GCSE year and would mean the school would no longer be a secondary school.
30. The school provides a pleasant environment for pupils and that appears to have been important when the site was inspected by Ofsted. This is the only Muslim faith school within the Council's area and it is also a girls' school. Of the current pupils 20% come from Hillingdon and the remainder from surrounding boroughs. The school clearly plays an important part in the mix of education choice in this and surrounding boroughs.
31. From my inspection of the building, it is clear that each room is utilised and that it would not be possible to comfortably sub-divide the existing rooms within the main part of the school to provide replacement classrooms whilst retaining current standards and pupil numbers. Furthermore, the property is leased by the school and extending the building itself rather than using the cabins, in a manner that the Council indicated may be more appropriate, would be expensive with no guarantee of long-term tenure. Extending or sub-dividing would not appear to be viable alternatives.
32. The premises have been accepted by Ofsted as meeting the requirements relevant to the 'material change' of circumstances due to the relocation. It is clear from the submitted evidence and what was discussed at the hearing that finding suitable premises is difficult because of the need to provide the right kind of accommodation in the right location. The change of location from Hounslow took place in 2018 as that accommodation had been unsuitable. The leaders of the school had also previously considered other premises, such as a property in Isleworth which were also less suitable. As well as needing to accommodate pupils on site, accessibility to other facilities such as sports centres, is also important and is a significant consideration for the location of the school. Finding suitable premises for a school involves many factors.
33. The Framework states that it is important that a sufficient choice of school places is available to meet the needs of existing and new communities. It is necessary to take a proactive, positive and collaborative approach to meeting

this requirement and to development that will widen choice in education. Furthermore, great weight needs to be given to expansion or alterations of schools through decisions on applications. The change of location has helped the school develop and improve and the development has enabled substantial positive social benefits.

34. It was also explained to me that prior to the school opening, that the site suffered from fly-tipping, infestation and incidence of anti-social behaviour.

Very special circumstances

35. I am required to give substantial weight to the limited harm to openness and the purposes of including land within the Green Belt. I have found that the development does not cause any harm with respect to the third and fourth main issues which are therefore neutral factors in my overall balancing exercise.
36. I attribute substantial weight to the harm that would be caused to students studying for GCSEs if those classes could no longer be offered. I give further substantial weight to the impact that the loss of classes and potentially the loss of the school would have for education choice generally and significant weight to the harm that would be caused to this community within this and neighbouring boroughs. The active use of the site adds a little further weight in favour of retaining the development in order to maintain the active use of the site.
37. For these reasons, I therefore consider that collectively the weight that should be attributed to allowing the development clearly outweighs the harm that I have identified to the Green Belt. Looking at the case as a whole, I consider that very special circumstances exist which justify the development.

Conditions

38. The Council suggests a condition to make the benefit of the planning permission to the appellants only. As the PPG clarifies, planning permission usually runs with the land and it is rarely appropriate to provide otherwise. I do not consider that such exceptional circumstances apply in this case but I have attached a condition limiting the overall numbers of pupils as explained above. Included within the suggested personal condition is also a proposed requirement for removal of the classrooms when they are no longer used as part of a school. Given that the appeal has been allowed on the basis of very special circumstances, I have included a condition with a similar provision.
39. The Council suggests that permitted development rights should be removed for fences, gates walls and other means of enclosure. They also suggest that no buildings should be erected without planning permission. There are currently no such limitations although planning permission and the condition in part at least would merely double-up existing controls over development. I do not consider that the development being considered makes such exclusions any more necessary than at present.
40. The purpose of condition 3 is to require the appellant to comply with a strict timetable for dealing with details of parking and turning within the site which needs to be addressed in order to make the development acceptable. The condition is drafted in this form because, unlike an application for planning permission for development yet to commence, in the case of a retrospective

grant of permission it is not possible to use a negatively worded condition precedent to secure the subsequent approval and implementation of the outstanding detailed matter because the development has already taken place. The condition therefore provides for the loss of the effective benefit of the grant of planning permission where the detailed matters in question are not submitted for approval during the time set by the condition, approved (either by the local planning authority or on appeal), and then implemented in accordance with an approved timetable. Should the requirements of the condition not be met in line with the strict timetable, then the planning permission falls away.

Conclusion

41. For the reasons given above, I conclude that the appeal succeeds on ground (a). I shall grant planning permission for the installation of 2 portable cabins as described in the notice.

A Harwood

INSPECTOR

Schedule of conditions:

- 1) The number of pupils at the school shall not exceed 60 at any one time.
- 2) The 2 portable cabins hereby permitted shall be removed from the site within 3 months of the site ceasing to operate as a school.
- 3) The 2 portable cabins hereby permitted shall be removed and all equipment and materials brought onto the land for the purposes of their operation shall be removed within 1 month of the date of failure to meet any one of the requirements set out in i) to iv) below:
 - i. Within 3 months of the date of this decision a scheme for parking and turning within the site shall have been submitted for the written approval of the local planning authority and the scheme shall include a timetable for its implementation.
 - ii. If within 11 months of the date of this decision the local planning authority refuse to approve the scheme or fail to give a decision within the prescribed period, an appeal shall have been made to, and accepted as validly made by, the Secretary of State.
 - iii. If an appeal is made in pursuance of ii) above, that appeal shall have been finally determined and the submitted scheme shall have been approved by the Secretary of State.
 - iv. The approved scheme shall have been carried out and completed in accordance with the approved timetable.

Upon implementation of the approved scheme for parking and turning specified in this condition, that scheme shall thereafter be remain in use.

APPEARANCES

FOR THE APPELLANT:

Mr Cheung	Planning Consultant
Dr Saleem	Co-founder and Governor
Mrs Butt	Co-founder and head
Mr Khan	School accountant
Mr Qadri	

FOR THE LOCAL PLANNING AUTHORITY:

S Volley MSc Dip TP MRTPI	Planning officer
Mr Akram	Highways officer
Mr Briginshaw	Planning officer
Mr Lord	Planning enforcement officer

DOCUMENTS

- 1 Planning decision ref:26758/E/90/1850
- 2 Planning decision ref:26758/G/97/604

APPENDIX C

DISCHARGE OF CONDITION 3 (i) OF

APPEAL DECISION NOTICE

DELEGATED DETAILS DECISION

The delegation powers schedule has been checked. Director of Residents Services can determine this application.

Case Officer

Signature:

Date:

A delegated decision is appropriate and the recommendation, conditions/reasons for refusal and informatives are satisfactory.

Team Manager:

Signature:

Date:

The decision notice for this application can be issued.

Director / Member of Senior Management Team:

Signature:

Date:

NONE OF THE ABOVE DATES SHOULD BE USED IN THE PS2 RETURNS TO THE DCLG

Report of the Head of Planning, Transportation and Regeneration

Address INGLENOOK SIPSON LANE SIPSON

Development: Details pursuant to Condition 3 (Parking and Turning Scheme) of enforcement appeal Ref: APP/R5510/C/18/3213390 (Installation of 2 portable cabins accommodating additional school class rooms)

LBH Ref Nos: 26758/APP/2019/3689

Drawing Nos: LNS/2019/01
LNS/2019/05
LNS/2019/07A
LNS/2019/02
LNS/2019/03
Bollards Data Sheet
Gravel Grid Parking System and No Dig Surface Installations
LNS/2019/04A
LNS/2019/06A
CellPave 40 Product Sheets
Cover Letter (13 November 2019)

Date of receipt: 13/11/2019

Date(s) of Amendment(s):

1. MAIN PLANNING CONSIDERATIONS

This application seeks permission for the discharge of Condition 3 (Parking and Turning Scheme) of enforcement appeal PINS ref: APP/R5510/C/18/3213390 (Installation of 2 portable cabins accommodating additional school class rooms (Retrospective)).

Condition 3 states:

The 2 portable cabins hereby permitted shall be removed and all equipment and materials brought onto the land for the purposes of their operation shall be removed within 1 month of the date of failure to meet any one of the requirements set out in i) to iv) below:

- i. Within 3 months of the date of this decision a scheme for parking and turning within the site shall have been submitted for the written approval of the local planning authority and the scheme shall include a timetable for its implementation.
- ii. If within 11 months of the date of this decision the local planning authority refuse to approve the scheme or fail to give a decision within the prescribed period, an appeal shall have been made to, and accepted as validly made by, the Secretary of State.
- iii. If an appeal is made in pursuance of ii) above, that appeal shall have been finally determined and the submitted scheme shall have been approved by the Secretary of State.
- iv. The approved scheme shall have been carried out and completed in accordance with the approved timetable.

EXTERNAL CONSULTATION

Harlington Conservation Area Advisory Panel:

I am writing on behalf of the Harlington Conservation Area Advisory Panel. We have no objection to the plans submitted for car parking and turning if they do not involve the loss of any mature trees on the site.

INTERNAL CONSULTATION

Trees and Landscaping Officer:

The proposal includes the use of a permeable interlocking cellular paving grid system, laid on a Type 3 (permeable sub-base). This system is designed for use near trees and to provide improved natural drainage. It is not clear, from the plans, how the car park area (edged in purple) and the circulation area (edged in green) differ in detail and finish, other than 'no dig' construction near the trees? Will all of the cells be back-filled with free-draining gravel? Will the surface detail appear different?

RECOMMENDATION No objection subject to clarification, as described above.

Case Officer Comment:

The information submitted shows that all of the cells be back-filled with free-draining gravel and the two different surface details will not appear different.

Highways Officer:

No comment.

Case Officer:

The submitted details formalise the arrangement and layout of the car parking area. The original plans submitted showed the provision of 10 car parking spaces, including one accessible parking space. Parking spaces nos. 1 (accessible space) and 2 were not acceptable as a 6 metre manoeuvring space was not provided. The amended plans submitted removed these parking spaces and now show provision for 7 car parking spaces including 1 accessible parking space. Under the revised scheme, all proposed spaces are provided with a 6 metre manoeuvring space and are considered acceptable.

The car parking spaces are proposed to be delineated with white markers. Car park signage is also to be erected in order to improve legibility. These proposed elements are considered acceptable.

Two bollards measuring 1.2 metres in height are also proposed to ensure that the concrete step serving the side entrance of the School is protected. These are not considered to compromise the car park manoeuvring space and are considered acceptable.

The details submitted also includes the proposal of a no-dig permeable load-spreading and interlocking cellular surfacing for the areas surrounding existing trees and an interlocking cellular paving grid with gravel surfacing for the remaining areas of the car park. This is proposed to ensure that the car park

remains permeable and so that a no-dig solution minimises harm to tree root protection areas. The Council's Trees and Landscaping Officer considers this arrangement to be acceptable.

In terms of a timetable, the submitted cover letter notes the intention to undertake and finish the works by no later than the end of April 2020.

Given the above considerations, it is recommended that Condition 3 of enforcement appeal PINS ref: APP/R5510/C/18/3213390 is discharged.

2. RECOMMENDATION

APPROVAL

INFORMATIVES

Contact Officer: Michael Briginshaw

Telephone No: 01895 250230

APPENDIX D

HIGHWAYS AUTHORITY

CORRESPONDENCE

RE: APP/R5510/C/18/3213390 - Inglenook, Sipson Lane

From: [REDACTED]

To: [REDACTED]

Date: Monday, 14 June 2021, 15:30 BST

Hi Cat

Two Sheffield stands with capacity for 4no. bicycles would be sufficient.

Thanks

Alan

From: [REDACTED]

Sent: 14 June 2021 12:57

To: [REDACTED]

Subject: Re: APP/R5510/C/18/3213390 - Inglenook, Sipson Lane

Hi Alan, thanks for your very speedy reply!

There is no cycle parking at all at the moment. The staff also wear full-length dress, so cycling is impractical for them also.

On this basis, and to confirm, you are content with the provision of visitor cycle parking only?

Kind regards

Cat

On Monday, 14 June 2021, 12:43:41 [REDACTED] wrote:

Hi Cat

Yes that would be acceptable. Is there cycle parking for staff?

Thanks

Alan

From: [REDACTED]
Sent: 14 June 2021 12:41
To: [REDACTED]
Subject: Re: APP/R5510/C/18/3213390 - Inglenook, Sipson Lane

Good morning, Alan,

Many thanks for your response, and we will proceed as described.

With respect to cycle parking we feel that to meet the minimum standards required by TfL would result in disused infrastructure which would just deteriorate over time. However, it is recognised that visitors might be able to cycle therefore would you be in agreement if the school were to provide just a single cycle stand as per the short-stay minimum requirement by TfL? As mentioned before, the fact that all the pupils and staff wear full-length dress makes cycling difficult and unsafe for them.

I look forward to hearing your thoughts.

Kind regards

Cat

On Monday, 7 June 2021, 09:42:26 [REDACTED] wrote:

Good morning

Thank you for your email. You mention that travel to school by bus is a more realistic travel option, please could you therefore present details of the level of provision for pedestrians walking between the nearest bus

stops and school gate. A photographs and commentary of the walking environment will suffice, I need this to be able to assess whether travel to the school by bus is realistic and if not how could the level of provision be improved.

As well as PM pick up parking surveys I do also require parking surveys in the AM, this is because in the AM all vehicles arrive within a limited space of time, unless the school day start times are staggered?

Kind regards

Alan

From: [REDACTED]
Sent: 03 June 2021 14:35
To: [REDACTED]
Subject: Re: APP/R5510/C/18/3213390 - Inglenook, Sipson Lane

Hi Alan,

Many thanks for your response.

I am happy to cover most of the items you have listed, but I have reservations about undertaking a full ATZ Assessment. This normally accompanies a Transport Assessment rather than a TS as it is a huge undertaking, especially for a school the size of Lady Nafisa. I understand that ATZ Assessments are usually carried out only when a development is referred to the GLA or the Mayor, so I feel that to provide one for the school may be a little overkill, and generally out of proportion to the value of the application.

It is to be noted that the school is a Muslim religious private school for girls, with an all-female staff, so its demographic means that some pupils and, indeed, staff may not be permitted to travel alone walking or cycling, and their school uniform means that cycling would be difficult due to its full length - this is probably one of the reasons why nobody currently cycles to the school. It is also much smaller than most state-run schools, and its catchment area is likely to be rather wider than those for state schools and, thus, the average distance travelled is likely to be greater by comparison, and more suited to the bus (and car). Therefore I believe that an ATZ Assessment would be of limited benefit in this case. Certainly, with Travel Planning, we can encourage those within walking distance to use this mode, though, if it is acceptable to them and their parents. My focus will be on using the bus to travel to school as this is highly accessible and serves a long residential corridor.

I am happy to provide, instead of an ATZ Assessment, a desktop assessment, included in the TS, with reference to the school's local catchment area, and facilities that are likely to be used by staff during lunchtime.

With reference to the parking survey, I would propose that this is undertaken both sides of the the afternoon pick-up time providing a 'before' and 'during' scenario. I have chosen the afternoon pick-up rather than the morning drop-off as it is more likely that parents and guardians will park and wait for their charges to come out of school, whereas the morning drop-off does not involve any waiting and is unlikely to create any excessive

demand for parking.

I would be grateful if you could confirm that you are content with an abridged assessment of walking and cycling facilities near the school, as described, and that you are happy with the timings of the parking survey.

Kind regards

Cat

On Wednesday, 2 June 2021, 15:55:56 [REDACTED] wrote:

Dear Cat

To help me assess any forthcoming s.73 application I would require a Transport Statement and a Framework Travel Plan. These should provide

- The results of a pupil and staff travel survey inc time of arrival/departure
- Details of on-plot parking provision including how these spaces are managed
- Summary of parking restrictions within 200m of the school
- An Active Travel Zone assessment – to determine the adequacy of the pedestrian/cyclist environment
- Provision for pick up/drop off by private car and mini bus – if applicable
- A Framework Travel Plan with targets, how it will be monitored and reviewed and what actions would be taken if the targets are not met. An undertaking to work with the Council's Road Safety and Active Travel Plan Team would be welcomed
- Details of cycle parking – follow TfL Design Standards

I hope this is helpful

Alan

From: [REDACTED]
Sent: 01 June 2021 09:38
To: [REDACTED]
Subject: Fw: APP/R5510/C/18/3213390 - Inglenook, Sipson Lane

Good morning Alan,

I was wondering if you'd had a chance to look at my email of 19th May (below)? I would be grateful if you could get back to me as soon as you can.

Kind regards

Cat

----- Forwarded message -----

From: [REDACTED]

To: [REDACTED]

Sent: Wednesday, 19 May 2021, 10:24:11 BST

Subject: Re: APP/R5510/C/18/3213390 - Inglenook, Sipson Lane

Good morning Alan,

Thank you for getting back to me so promptly.

The address of the application site is Lady Nafisa School for Girls at 'Inglenook', Sipson Lane, West Drayton UB7 0JG. It is a Section 73 Variation of Condition application in relation to Condition 1 of the Appeal Decision regarding retrospective planning consent for two portacabins each being used as an additional classroom. This Condition states 'The number of pupils at the school shall not exceed 60 at any one time.' The Applicant wishes to increase the pupil numbers to 80, as suggested by Ofsted. I am preparing a Transport Statement and Travel Plan to support this application.

The planning history of the site is as follows:

01/02/1991 26758/E/90/1850 Change of use from dwelling day nursery for 36 0-5 yr old children, and erection of single storey rear extension and parking facilities. Granted

27/06/1997 26758/G/97/0604 Increase in use of nursery from 36 to 40 pupils. Granted

13/06/2018 26758/APP/2018/1405 Installation of two no. portacabins accommodating additional classrooms (retrospective) Refused

15/08/2019 APP/R5510/C/18/3213390 Appeal against refusal of 26758/APP/2018/1405 Allowed

It should be noted that Condition 3(i) of the Appeal Decision stated that 'Within three months of the date of this

decision a scheme for parking and turning within the site shall have been submitted for the written approval of the local planning authority and the scheme shall include a timetable for its implementation. This has been carried out and the car park layout has been approved, comprising seven parking spaces of which one is for disabled use, and a turning area for drop-off and pick-up, and deliveries. Refuse will continue to be collected kerbside as before.

The school has undertaken a survey of travel modes by pupils and staff, which gives an accurate trip generation and modal split. This has been checked on-site by an officer of Hillgdon Council (I believe it was Armid Akram) who confirmed that the data was accurate. It is evident from the data that nobody walks or cycles to the school, but there is a high incidence of bus use (predicted modal split of 57.61%). The school currently employs 14 staff (6 full time, 8 part-time), and these numbers will not increase should the application be granted.

Only seven staff park on-site, the others using the bus or are dropped off and collected by car. Because nobody cycles to the school, there are at present no cycle parking spaces provided. The surrounding walking infrastructure is good and, although the school lies in a PTAL area of 1b, the bus stops very close to the school, is very frequent, and its route takes it through a large corridor of residential development.

I would like to discuss scope and various issues with you. These are as follows:

- * Trip generation and modal split - are you happy with the method? (I am awaiting confirmation from the client regarding method of collecting the data).

- * Cycle parking

- * Accident data - do we need to include it?

- * Car parking

- * Any other issues you may wish to be included or considered

I attach a number of documents which I hope will be useful. I've included an extract from my draft TS showing trip generation and modal split.

I would be grateful if you could let me know your thoughts - I can be contacted on 01823 420022.

Kind regards

Cat

On Wednesday, 19 May 2021, 09:29:47 [REDACTED] wrote:

Good morning Cat

The message below has been copied to myself for action, I also do not recognise the reference number, are there any other details you could provide please?

Kind regards

Alan Tilly

From: [REDACTED]
Sent: 17 May 2021 10:28
To: Planning <planning@hillingdon.gov.uk>
Subject: APP/R5510/C/18/3213390 - Inglenook, Sipson Lane

Good morning,

I would be grateful if you could put me in touch with **Armud Akram**, if he is still with you. Otherwise, please could you let me have contact details for the transport planning officer who would be dealing with the above?

Please note that the appeal reference number provided is not recognised on your planning portal, so I am not sure if it is correct.

Kind regards

Cat

Catalyst TP

Tel: [REDACTED]

Email: [REDACTED]

Alan Tilly

Transport Planning and Development Team Manager

[REDACTED]

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APPENDIX E

PEDESTRIAN AUDIT

LADY NAFISA SCHOOL FOR GIRLS
INGLENOOK
SIPSON LANE, WEST DRAYTON

Pedestrian Audit

On behalf of

HA MEEM FOUNDATION

July 2021 / Version 1.1



Table of Contents

- 1. Introduction 1
- 2. The Audit..... 2
- 3. Conclusions and Remediation..... 10

Figures

Figure 01 Audit Route

1. Introduction

- 1.1 Catalyst TP has been instructed by the Ha Meem Foundation to provide a Pedestrian Audit to support a Variation of Condition under Section 73 of the Town and Country Planning Act 1990 of the Appeal Decision under reference number APP/R5510/C/18/3213390, for retrospective planning consent relating to the installation of two portacabins at Lady Nafisa Independent Secondary School for Girls, situated on Sipson Lane, West Drayton, UB7 0JG. The Application is for an increase in pupils from 60 to 80.
- 1.2 This Audit was requested by officers of Hillingdon Council to demonstrate that the walking environment between the Lady Nafisa School for Girls and the nearest bus stops is adequate to facilitate the use of the bus as an alternative mode of travel to the private car.
- 1.3 The Audit was carried out on Friday 23rd July 2021, and traced pedestrian movements from the school to the bus stops, as shown on **Figure 01**.

2. The Audit

SCHOOL APPROACH

- 2.1 This area encompasses a spur of The Vineries adjacent to a row of council-owned parking spaces just to the south of the school, from the school entrance to the road proper. Whilst there appears to be an abandoned motorcycle within the parking area, it does not impede pedestrians.



- 2.2 The area is tarmacked and benefits from a street lamp directly adjacent. There is a short length of footway connecting the area to the main part of The Vineries. The route between the school gates and The Vineries is generally free of obstruction, although fly-tipping has taken place at the entrance to 'Grow Heathrow' adjacent to the school.



- 2.3 The route across the end of The Vineries is generally well-made, although it lacks a dropped kerb on its western side to conform to the desire line to and from the school.



- 2.4 At the junction of Sipson Lane with The Vineries, the footway widens to approximately 8m before narrowing to around 1.75m on Sipson Lane. The surface is adequate. However, fly-tipping has taken place in this location although the effective width is still around 7.75m and pedestrians can pass easily. This footways abuts a verge which has been furnished with small bollards to prevent drivers parking on it.



- 2.5 Safety railings have been provided outside the church on the northern side of Sipson Lane, although these do not significantly reduce the effective width of the footway. There is evidence of Works that have been undertaken within the footway and, although the surface is heavily patched, there are no trip hazards and pedestrians are able to maintain sufficiently level progress between The Vineries and the junction of Sipson Lane with Sipson Road.



- 2.6 There are suitable dropped kerbs and tactile paving present at the junction of Sipson Lane with Sipson Road, enabling pedestrians to easily cross in this location.



- 2.7 At the mini-roundabout junction, the footway is in good repair and generally free of obstruction. Visibility here is good.



- 2.8 The pedestrian route on the eastern side of Sipson Road is generally in good condition, and no obstructions are evident.



- 2.9 The southbound bus stop consists of a flag and pole, and is equipped with a timetable affixed to the pole.



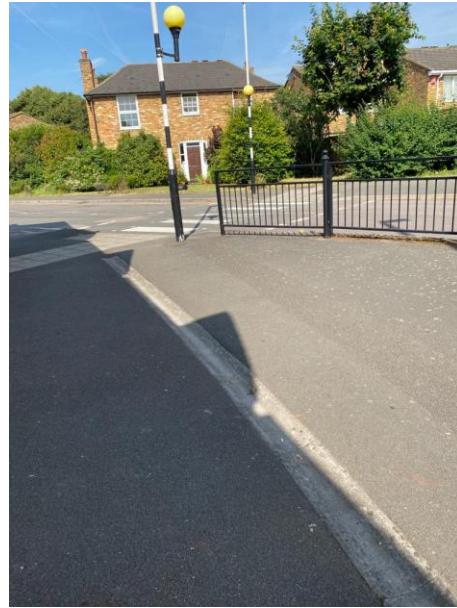
- 2.10 The route between the southbound bus stop and the zebra crossing at the junction with Harmondsworth Lane is of good quality and has no obstructions.



- 2.11 The zebra crossing on the southern arm of the junction between Sipson Road and Harmondsworth Lane is in an acceptable condition, with dropped kerbs and tactile paving in good repair.



- 2.12 There is a small gully running across the frontage of the King William public house which could constitute a trip hazard, especially for partially sighted or blind pedestrians. However, there is sufficient space for a single pedestrian to avoid the gully on either side of it.



- 2.13 The zebra crossing at the junction of Harmondsworth Lane with Sipson Road on its western arm is in reasonable condition, and is furnished with dropped kerbs and tactile paving which are both in good repair.



- 2.14 The footway from Harmondsworth Lane to the northbound bus stop is generally in good repair and without obstruction. A small drain cover has become dislodged on the kerb, although it does not directly impede the safe passage of pedestrians.



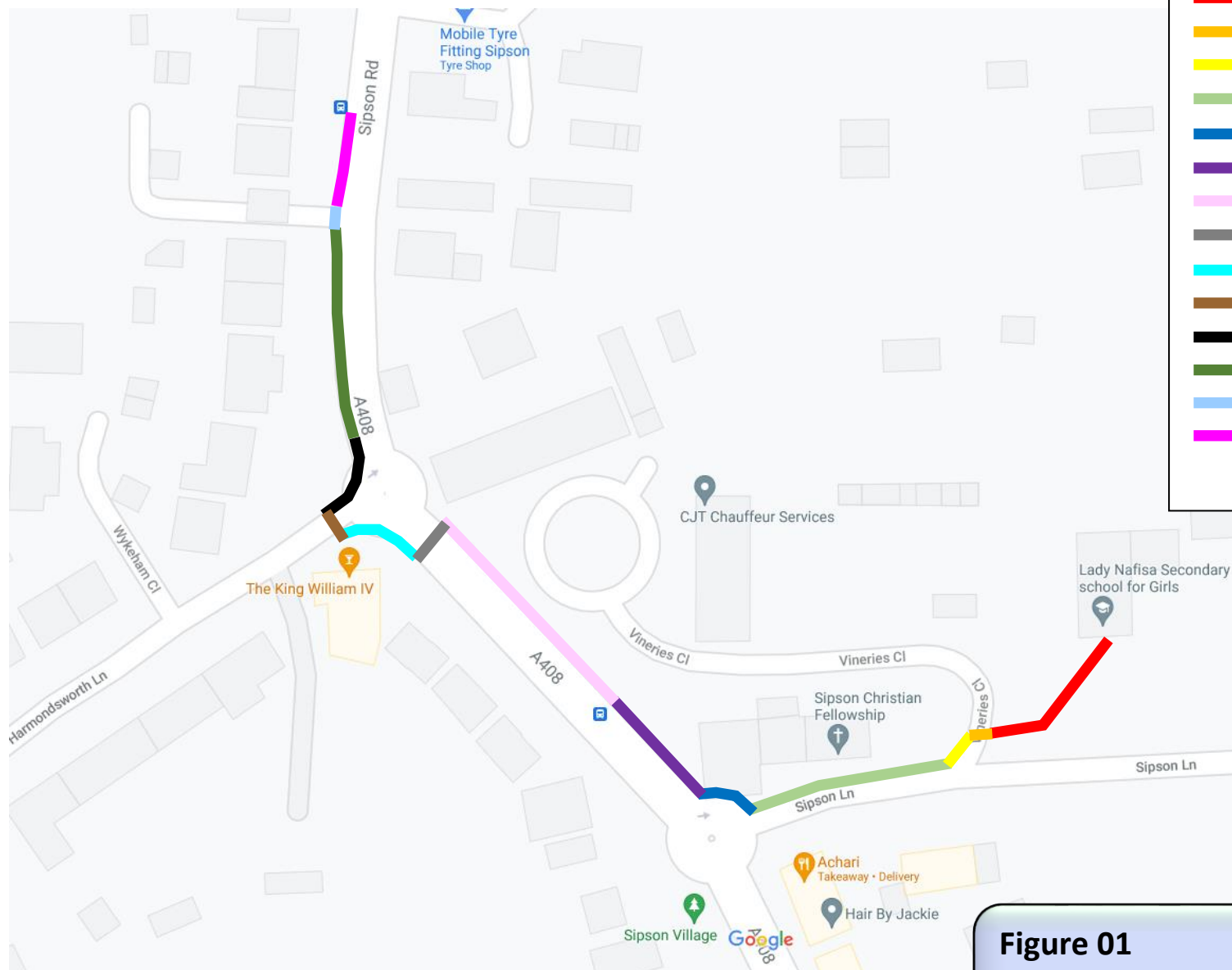
- 2.15 The northbound bus stop is furnished with a shelter, seating, timetable and rubbish bin, all of which are in good repair. However, there is some overgrowth of foliage impeding comfortable occupation of the bench.



3. Conclusions and Remediation

- 3.1 The route between Lady Nafisa School for Girls and the nearest bus stops on Sipson Lane is in generally good condition and for the most part lacks obstruction.
- 3.2 The western side of The Vineries at its junction with Sipson Lane lacks a dropped kerb.
- 3.3 There is a small section of footway between the school and the junction of Sipson Lane with Sipson Road where the surface is slightly uneven due to poorly repaired Works. However, this does not currently constitute a trip hazard but could be subject to degradation over time. Repair of this area is within the jurisdiction of the council.
- 3.4 A small gully is present running across the frontage of the King William public house adjacent to the junction of Harmondsworth Lane with Sipson Road. Although there is room for a single pedestrian to pass, this could represent a trip hazard for the unwary, or blind/partially sighted. It is within the remit of Hillingdon Council to ensure that this hazard is rectified.
- 3.5 The bench provided at the northbound bus stop is obstructed by overgrown foliage. Maintenance by the council will rectify this.
- 3.6 It is concluded that the route between the school and the nearest pair of bus stops is of reasonable quality and presents no significant impediment to pedestrians, ensuring that the choice to travel by bus to and from the school is a valid and wholly available one.

FIGURES



Key

1. School entrance to road
2. Across Vineries Close
3. Vineries Close to Sipson Lane
4. Sipson Lane to Sipson Road
5. Mini-roundabout
6. Mini-roundabout to SB Bus Stop
7. SB Bus Stop to pedestrian crossing
8. Pedestrian Crossing
9. Sipson Road to Harmondsworth Road
10. Zebra Crossing
11. Harmondsworth Rd to Sipson Road
12. Sipson Road –W side
13. Across Lane
14. Lane to NB Bus Stop

Figure 01
Audit Route

APPENDIX F

PARKING SURVEY RESULTS

Lady Nafisa School for Girls

Parking Survey Results

Date: 22nd July 2021

Conducted by Mr J Chaudhry and Mrs F Butt

08:00

Section No.	Section Description	No. Parked vehicles	Notes
1.	School car park	4	
2.	Council parking spaces & school approach	5	
3.	The Vineries (whole length)	19	
4.	Sipson Lane to 50m beyond motorway bridge	15	
5.	Sipson Lane to Sipson Road	3	
6.	Sipson Road, between Sipson Lane and Harmondsworth Lane	0	
7.	Sipson Road between Sipson Lane and Hollycroft Gardens	10	
8.	Track adjacent to 373 Sipson Road.	2	

08:10

Section No.	Section Description	No. Parked vehicles	Notes
1.	School car park	7	
2.	Council parking spaces & school approach	5	1 vehicle dropping off
3.	The Vineries (whole length)	20	
4.	Sipson Lane to 50m beyond motorway bridge	15	
5.	Sipson Lane to Sipson Road	3	
6.	Sipson Road, between Sipson Lane and Harmondsworth Lane	0	
7.	Sipson Road between Sipson Lane and Hollycroft Gardens	8	
8.	Track adjacent to 373 Sipson Road.	2	

08:30

Section No.	Section Description	No. Parked vehicles	Notes
1.	School car park	6	
2.	Council parking spaces & school approach	12	
3.	The Vineries (whole length)	17	
4.	Sipson Lane to 50m beyond motorway bridge	13	
5.	Sipson Lane to Sipson Road	3	
6.	Sipson Road, between Sipson Lane and Harmondsworth Lane	0	
7.	Sipson Road between Sipson Lane and Hollycroft Gardens	11	
8.	Track adjacent to 373 Sipson Road.	1	

14:30

Section No.	Section Description	No. Parked vehicles	Notes
1.	School car park	7	
2.	Council parking spaces & school approach	5	
3.	The Vineries (whole length)	7	1 drop off
4.	Sipson Lane to 50m beyond motorway bridge	15	
5.	Sipson Lane to Sipson Road	3	
6.	Sipson Road, between Sipson Lane and Harmondsworth Lane	0	
7.	Sipson Road between Sipson Lane and Hollycroft Gardens	9	
8.	Track adjacent to 373 Sipson Road.	1	

15:00

Section No.	Section Description	No. Parked vehicles	Notes
1.	School car park	10	
2.	Council parking spaces & school approach	11	
3.	The Vineries (whole length)	17	
4.	Sipson Lane to 50m beyond motorway bridge	15	
5.	Sipson Lane to Sipson Road	5	
6.	Sipson Road, between Sipson Lane and Harmondsworth Lane	0	
7.	Sipson Road between Sipson Lane and Hollycroft Gardens	13	
8.	Track adjacent to 373 Sipson Road.	0	