Hillingdon Manor School
New horticultural facility and Forest School

Planning Statement

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WYG, 90 Victoria Street, Bristol, BS1 6DP
Tel: +44 (0)117 9254393
Email: bristol.planning@wyg.com www.**wyg**.com

www.wyg.com

creative minds safe hands

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1.0 Introduction

1.1 Context for the proposals

1.1.1 This Planning Statement has been prepared by WYG Planning on behalf of Options Autism (7) Ltd ("the applicant") in support of its application for planning permission to create a new horticultural facilities and Forest School at Hillingdon Manor School, Harlington Road, Hillingdon.

1.1.2 Hillington Manor School is a specialist school for children and young people who have been diagnosed with Autistic Spectrum Conditions (ASC), learning disabilities and complex needs. The proposals seek to extend the current provision of the school to provide additional vocational opportunities for fifteen students aged 16+ in the areas of horticulture, Land-Based Studies, Forest Schools and associated activities.

1.1.3 The site and existing school are located within the Green Belt. Whilst the use of Green Belt land and buildings (subject to certain criteria) for horticultural and open, land-based, recreational activities is supported by relevant planning policy at a national, London-wide and Hillingdon Council level, these uses and buildings are directly related to the school.

1.1.4 Notwithstanding what are considered to be the demonstrable benefits of co-locating the proposed new facilities adjacent to the existing school complex, and the necessity of the uses being on and part of open land, the provision of these new facilities does require a planning assessment of their impact on the aim and purposes of designating land as Green Belt. The extent of this impact must then be balanced against the benefits of the proposals. Any harm considered to be caused to the aim and purposes of designating this land as Green Belt must be outweighed by the benefits such that very special circumstances are considered to exist, and planning permission can be granted.

1.1.5 This Planning Statement therefore sets out the overall case for the proposals by describing the need for the new facilities; detailing the site context and application proposals; assessing the proposals against the objectives of relevant planning policies (most obviously specialist education provisions and the justification for allowing development in the Green Belt); and considering whether there are other determining factors which should be taken into account in the overall planning assessment of the proposals.

1.2 Description of the proposals

1.2.1 The principal built elements of the proposal involve the delivery of two classroom buildings (one being relocated from elsewhere within the school site), providing four classrooms in total, for horticultural and Forest School facility. A third building will provide canteen/café and kitchen facilities.

1.2.2 These buildings will be located adjacent to the existing school buildings, at the school's northern boundary and will, in turn, provide access to the new horticultural study area (to the north) and Forest School area (within the new coppice, to the west and north). This land is currently open.

1.2.3 In addition to the new coppice, new planting in the form of hedgerows will be provided between the new facilities and the existing main school car park and to the new boundary with the open space to the north.

1.2.4 Vehicular access will be created from the existing access to the school, with a dedicated area of 12 parking spaces used to relieve congestion currently experienced with parking along the access driveway.

1.2.5 The application for planning permission therefore comprises:

"Change of use of open space and construction of new school buildings and associated access, parking and landscaping in association with the creation of a Forest School and horticultural facility at Hillingdon Manor School".

1.3 Supporting Documentation

1.3.1 The application is supported by this Planning Statement and should be read in conjunction with the following documents:

- Completed planning application forms.
- Scheme drawings, prepared by SpaceM Studio.
- Design and Access Statement, prepared by SpaceM Studio.
- Preliminary Ecological Appraisal, prepared by ECOSA.
- Arboricultural Impact Assessment (incorporating Tree Survey), prepared by Helicopter Trees.
- Phase I and Phase II Geoenvironmental Site Investigation, prepared by Patrick Parsons.

2.0 Site Development Proposals

2.1 Background to the proposals

2.1.1 Hillingdon Manor School is an independent specialist school for children and young people who have been diagnosed with Autistic Spectrum Conditions (ASC), learning disabilities and complex needs between three and a half and nineteen years of age.

2.1.2 The school is located across two sites: The primary school is school is located in Yiewsley, and caters for 58 children aged three and a half to 11 years; the secondary school, subject of this application, is located at the Harlington Road site and caters for 130 children aged 11 to 19.

2.1.3 The school is a part of Options Autism, which is one of the divisions within Outcomes First Group. Options Autism is a specialist provider of education and care for children, young people and adults with Autism Spectrum Conditions (ASC), learning disabilities and complex needs.

2.1.4 The school offers a unique mix of education and support to pupils within a wide spectrum of needs and abilities. Personalised teaching and learning in an autism specific environment allow pupils' individual needs to be addressed completely and their capabilities fully realised.

2.1.5 To support the children with their unique educational needs, the school has a multidisciplinary team consisting of Clinical Psychologists, Counsellors, Play Therapists, Occupational Therapists and Speech and Language Therapists.

2.1.6 The schools therapy provision is designed to support the students' overall development by addressing their individual identified needs. The school makes effective use of the students' Education, Health and Care Plans (EHCPs) to design appropriate support and intervention programmes which lead to a positive impact on their educational and personal outcomes.

2.1.7 Therapy is delivered individually with students to address specific needs that are highlighted by teachers and parents and specified in their Education, Health and Care Plans. Group sessions are also delivered by the team as well as supporting teachers to embed the strategies into their daily teaching.

2.2 The proposed facilities and activities

2.2.1 Hillingdon Manor School opened in 1999 as an independent school with the aim of providing a tailored environment for children and young people with autism. Since its opening Hillingdon Manor School has continued to grow in population and is now registered for 170 pupils.

2.2.2 Located over two sites, the school offers a unique mix of education and support for pupils within a wide spectrum of needs. The secondary school is located at The Manor, with currently two buildings providing provision for Year 7 up to Year 14. The curriculum approach enables all pupils to be taught in a way which optimises their learning and is relevant and meaningful to them. The school also delivers a range of vocational and life skills subjects to prepare pupils for life beyond school.

2.2.3 The application proposal seeks to deliver enhanced facilities for the Skills For Life Centre. The current secondary provision would be extended to provide additional vocational opportunities for students aged

16+ with autism and learning disabilities through the creation of a Forest School and horticulture provision.

2.2.4 The proposal is deliberately located at the northern boundary of the existing school on the adjacent open land. This is a key determinant of the scheme as the new provision and facilities require both the infrastructure of the existing site in terms of the sharing of resources due to the complex nature of the pupils' needs and the open land for the learning opportunities themselves.

2.2.5 The built facilities comprise two modular classroom blocks, one of which is being relocated from elsewhere on the school site. These two buildings will house four classrooms that will allow for the intake of 15 additional post-16 pupils with ASC and learning difficulties.

2.2.6 A separate building will house the Forest Schools café. This facility will enable the delivery of BTEC/ASDAN hospitality and catering courses for learners with ASC and additional needs. The building will contain a kitchen and dining area in a open plan café style layout. In addition to the delivery of curricula, the café will serve as an internal enterprise for staff and students. Furthermore, the opportunity will exist for local organisations such as Mencap, Hillingdon Age UK and other community groups to have access to the facility – by invitation – to support the hospitality aspects of the curriculum.

2.2.7 Adjacent to the new classroom blocks will be the horticultural area. This will allow the growing of various vegetables in seven rotated beds and 18 perennial raised vegetable beds. Fruit vines will also be planted. A limited number of temporary, small-scale, non-fixed polytunnels will be used in this area, together with a small chicken run, composting area and potting shed. The fruit and vegetable crops grown will be used in school meal provision, in the café and for sale to parents and staff.

2.2.8 The school will be in receipt of Forest Schools Centre accreditation from September 2019 following development of the Forest School area at the primary school site. This accreditation will enable the school to develop as a training centre for staff and students. The ethos of Forest School is based on a fundamental respect for children and young people and for their capacity to instigate, test and maintain curiosity in the world around them. It believes in children's right to play; the right to access the outdoors (and in particular a woodland environment); the right to access risk and the vibrant reality of the natural world; and the right to experience a healthy range of emotions, through all the challenges of social interaction, to build a resilience that will enable continued and creative engagement with their peers and their potential. The school employs one Forest School leader qualified to Level 4 and eight level 1 Forest School practitioners.

2.2.9 The area of the Forest School will contain an activities circle/fire pit and allow for the planting of 50 saplings to be looked after by the pupils through their Land-Based Studies modules.

2.2.10 The proposal also includes 12 marked car parking bays adjacent to the Forest Schools café building. These spaces will replace the unmarked parking which currently takes place on the main access road for the school, thereby both reducing congestion and improving safety.

2.2.11 The planning application therefore promotes an exciting vision to enhance the school's facilities for both its own pupils and the wider community. It forms a vital element of the continued delivery of the school's aims and objectives.

2.3 Site context

2.3.1 Hillingdon Manor School occupies an approximately 0.57ha irregularly-shaped plot located on the south-west side of Harlington Road. The whole school site, as well as land to the north, south and west, is in the Green Belt.

2.3.2 A single-storey indoor swimming pool, used by Mencap, adjoins the southernmost corner of the school site. To the south of the whole school site, at the opposite end to the proposed new facilities, are residential properties. The school is bounded to the north and west by privately-owned fields (it is a small area of the fields to the north on which the new facilities are located). There are, therefore, not considered to be any noise-sensitive neighbouring uses for the location of the new facilities.

2.3.3 The school site accommodates a main, single-storey school building, a number of mobile classroom units (one of which is to be relocated to form part of this application), a playground, car parking and ancillary development.

2.3.4 The application site, including the shared access road, horticultural area and Forest School/copse area extends to approximately 235m^2.

2.3.5 A number of proposals to improve the school buildings have been approved in recent years, including an additional classroom block, new entrance and reception and the relocation of a mobile classroom (July 2009), two new modular classrooms and reorganisation of existing modular buildings (February 2013) and alterations and refurbishment of the school frontage (June 2017). These proposals all involved development in the Green Belt.

2.3.6 The educational benefits of the proposals are considered to be demonstrable, significant and responding to identified need. However, by reason of the site's location in the Green Belt, despite the horticultural and open recreational use of the space and buildings and their primary educational use, is not, in itself, sufficient justification in planning terms for either the uses or the buildings.

2.3.7 The design and siting of the new buildings and uses has, in addition, to address how they specifically respond to this Green Belt context. The continued use of single storey modular buildings responds to and reflects both the school's location in the Green Belt and the need to reorganise its layout to reflect changing requirements.

2.3.8 The design and siting of the new buildings and uses specifically addresses the potential impact on the openness of the Green Belt by maintaining the relationship between unbuilt/built land: The use of single-storey buildings located adjacent to the existing school buildings; siting of the horticultural area immediately to the north of the new buildings; creation of the new copse to the north and west: and specifically addressing the potential visual impact on the Green Belt by new screening and through deliberate design approaches.

3.0 Benefits of the Proposal

3.1.1 The application site is located within the Green Belt. The application proposals provide additional school facilities directly involving and related to uses appropriate to an open, Green Belt, location, horticulture and open recreation. It is, however, recognised that new buildings will be sited on unbuilt land and the uses are for educational purposes.

3.1.2 It is nevertheless considered that "very special circumstances" in this particular case clearly outweigh any marginal potential harm to the Green Belt, as well as any other harm.

- The needs of the school and of the school's pupils – are clear.
- The existing school is already within the Green Belt and planning permission has previously been granted for a range of extensions, alterations and adaptations of the site and its buildings.
- It is apparent that by reason of the location and design of the new buildings and the improvement of existing landscaping features that there will be no material impact on the site's openness or visual amenity.
- It is also apparent that the further enhancement of the school site will have no material impact on the purpose of including land in the Green Belt.

3.1.3 It is therefore considered that, in summary, the application proposals will provide the following key benefits:

1. Provide new educational facilities that will enable Hillingdon Manor School to maintain, develop and expand its educational provision for its pupils.
2. Provide horticultural and Forest School learning opportunities for 16+ year olds to meet a demonstrable need.
3. Provide a new, community-accessible asset.

4.0 Planning Policy Considerations

4.1 Introduction

4.1.1 The starting point for the determination of any planning application is the adopted Development Plan. Section 38(6) of the Planning and Compulsory Purchase Act 2004 and section 70(2) of the Town and Country Planning Act 1990 state that planning applications should be determined in accordance with the relevant policies of the adopted Development Plan unless there are material planning considerations which indicate otherwise.

4.1.2 For this application, the Development Plan comprises the London Plan (March 2016); Hillingdon Local Plan: Part 1 – Strategic Policies (2012); and Hillingdon Local Plan: Part 2 (2007 - the extant Saved Unitary Development Plan policies).

4.1.3 The Council's revised Local Plan Part 2 (Development Management Policies, Site Allocations and Designations and Polices Map) was submitted to the Secretary of State in May 2018 and found to be substantially "sound" in November 2018, subject to certain modifications. Draft relevant policies which have not been subject to significant modification are therefore considered in this section.

4.1.4 The National Planning Policy Framework ("the Framework") was published in 2019 and is a material consideration in the determination of planning applications.

4.1.5 The Framework states that the purpose of the planning system is to contribute to the achievement of sustainable development (paragraph 7), with planning policies and decisions playing an active role in guiding development towards sustainable solutions, "*but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area*" (paragraph 9).

4.1.6 Decisions on planning applications should apply a presumption in favour of sustainable development, approving proposals that accord with an up-to-date development plan without delay or, where the policies which are most important for determining the application are out-of-date, granting permission unless the application of policies in the Framework that protect areas of particular importance provides a clear reason for refusing the proposals or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the policies of the Framework taken as a whole (paragraph 11).

4.1.7 The application is for new, much needed educational facilities, at an existing school located within the Green Belt. As a consequence of this location, the current use of the specific site of the new facilities as open land, and the proposals to deliver enhanced specialist educational provision, the key planning policy considerations are considered to be:

(i) The approach to new educational provision.
(ii) Development in the Green Belt.
(iii) Site-specific development issues.
(iv) Other planning matters.

4.1.8 We address each of these considerations in turn.

4.2 The approach to new educational provision

4.2.1 The National Planning Policy Framework states that planning decisions should aim to achieve healthy, inclusive and safe places (paragraph 91) and provide social and recreational facilities and services the community needs (paragraph 92), including supporting the delivery of local strategies for all sections of the community.

4.2.2 Specifically, the importance of the availability of a sufficient choice of school places to meet the needs of communities is recognised, with local planning authorities urged to "*take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education"* (paragraph 94).

4.2.3 In this context, local planning authorities should "*give great weight to the need to create, expand or alter schools*".

4.2.4 London Plan Policy 3.18 Education Facilities similarly supports proposals which enhance education and skills provision, including the expansion of existing schools and the change of use of space and buildings to educational purposes. Reflecting the Framework, the policy seeks to ensure that all children have access to a high quality school education, requiring Councils to take *a "proactive, positive and collaborative approach to development that will widen choice in education"* when determining planning applications, and recognising that this is a fundamental determinant of the future opportunities and life chances of London's children and young people.

4.2.5 Policy R10 of the Hillingdon Local Plan: Part 2 - Saved UDP Policies seeks to encourage the provision of enhanced educational facilities across the borough, subject to other polices in the UDP.

Assessment

4.2.6 It is apparent that the extension of Hillingdon Manor School will deliver positive improvements to the extent and quality of education provision in Hillingdon.

4.2.7 There are currently no other schools in Hillingdon which provide post-16 years education for children with Autistic Spectrum Conditions (ASCs), and only six schools in nearby boroughs that offer post-16 qualifications. More specifically, the school has experienced demand for food technology and horticulture courses and there is clear benefit is further developing its Forest Schools provision. These cannot be achieved within the existing school site and facilities. In addition to providing a suitable base for Forest Schools, the proposal will provide new and improved facilities which will mean that, from 2020, an additional 15 full time students could undertake ASDAN and BTEC qualifications in the school.

4.2.8 It is therefore considered that the proposals meet relevant planning policies in principle relating to additional educational provision, and accord with London Plan Policy 3.18 and Local Plan Policy R10.

4.2.9 It is nevertheless apparent that the site's location in the Green Belt, and the precise form and location of the proposed new uses and buildings, is also a relevant consideration in any assessment of the acceptability of the application.

4.3 Development in the Green Belt

4.3.1 The National Planning Policy Framework again sets the context for the Government's approach to Green Belts and their importance. Paragraph 133 confirms the *"fundamental aim"* of Green Belt policy is to

"prevent urban sprawl by keeping land permanently open" and that *"the essential characteristics of Green Belts are their openness and their permanence".*

4.3.2 Paragraph 134 outlines the five purposes of designating land as Green Belt:

- To check the unrestricted sprawl of large built-up areas.
- To prevent neighbouring towns merging into one another.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns.
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

4.3.3 This fundamental aim of Green Belt policy and these five purposes therefore provide the context for assessing any development proposals.

4.3.4 It should also be noted that the Framework also requires (Paragraph 141) councils to plan positively to enhance the beneficial use of their Green Belt land, including looking to *"provide access", "to provide opportunities for outdoor sport and recreation"* and *"to retain and enhance landscapes"*.

4.3.5 The Framework differentiates between "*appropriate development*" and "*inappropriate development*" in the Green Belt (Paragraph 145). The use of land and construction and use of buildings for "*agriculture and forestry*" and the provision of "*appropriate facilities in connection with the use of land for allotments*" is appropriate development.

4.3.6 The construction of buildings and use of land for any other use in the Green Belt is *"inappropriate development"* which is, by definition, considered to be harmful to the Green Belt and should not be approved except in *"very special circumstances"*.

4.3.7 It is therefore apparent that, whilst elements of the proposal are for uses – horticulture, forestry, allotments, open recreation - which are typically associated with the Green Belt and considered to be "*appropriate development*", as a result of their primary relationship with the school and notwithstanding the demonstrable benefits of their provisions, they must be considered to be, technically, "*inappropriate development in the Green Belt".*

4.3.8 Paragraph 144 of the Framework explains that when considering any planning application for development in the Green Belt councils should ensure that *"substantial weight is given to any harm to the Green Belt"*. The Framework also states that very special circumstances will not exist unless *"the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations".*

4.3.9 These key principles relating to proposals for development in the Green Belt are reflected in the relevant Development Plan policies.

4.3.10 London Plan Policy 7.16 confirms that the strongest protection should be given to the Green Belt and that development should only be allowed where it complies with national guidance. The supporting guidance states that the Mayor is keen to see improvements in its overall quality and accessibility. Such improvements are likely to help human health, biodiversity and improve overall quality of life.

4.3.11 Local Plan Part 1 Policy EM2 (Green Belt, Metropolitan Open Land and Green Chains) and Part 2 Policy OL1 (Green Belt) have the same policy intention, although the wording is not considered to be entirely reflective of the more up-to-date national guidance and London Plan.

4.3.12 Hillingdon's draft revised Local Plan Part 2 – Development Management Policies (as submitted, March 2019) includes policy wording more reflecting of national guidance. Draft Policy DMEI4 restates that inappropriate development in the Green Belt will not be permitted unless there are very special circumstances, with extensions only permitted where the proposal "*would not have a greater impact on the openness of the Green Belt…and the purposes of including land within it than the existing development, having regard to…the height and bulk of the existing building on the site, the proportion of the site that is already developed, the footprint, distribution and character of the existing buildings on the site, the relationship of the proposal with any development on the site that is to be retained and the visual amenity and character of the Green Belt"*.

Assessment

4.3.13 This planning policy context establishes the key Green Belt considerations in relation to the application proposals:

(i) Is harm caused to the fundamental aim and five purposes of the Green Belt?

(ii) If harm is caused to the fundamental aim and/or five purposes of the Green Belt, do very special circumstances exist to the extent that the potential harm to the Green Belt is clearly outweighed by other considerations?

4.3.14 We now address these questions in turn.

(i) Potential impact on the aims and purposes of including land within the Green Belt

4.3.15 It is acknowledged that, although many of the uses proposed by the application for location in the Green Belt are typically associated with the Green Belt – horticulture, forestry, allotments, open recreation - by reason of association with the school they technically represent "inappropriate development". As a consequence it is necessary to consider whether very special circumstances exist to support the proposal.

4.3.16 Paragraph 143 of the Framework states that very special circumstances will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

4.3.17 The starting point in this assessment must therefore be to first establish the nature of the harm caused. This should focus primarily on the fundamental aim of the Green Belt - its contribution to openness. Any harm caused to this fundamental aim by reason of inappropriate development should be given substantial weight in the determination of any planning application.

4.3.18 Any assessment of the impact of the proposals on the openness of this part of the Green Belt must be viewed against the existing context. The school site is bounded to the east by a road, to the south by other built development and to the north and west by open land.

4.3.19 The new facilities are to be sited on land to the north of the existing school site. This includes the new coppice and the new horticultural study area. These elements of the new facilities will be the northernmost and westernmost extensions into the Green Belt and will form the new "boundaries" between the school and the open Green Belt. This would result in a natural and sympathetic aesthetic to the existing landscape.

4.3.20 At present, the land to the north and west of the school site is largely open and green. The open land to the north extends to approximately 0.53ha. The area of new built form within this land is 0.057ha.

4.3.21 The buildings of the school are single storey and principally flat-roofed modular classrooms. The new buildings will be three flat-roofed modular classrooms/canteen (with one relocated from within the school site). The positioning of the new built form and its height, massing and appearance are all factors that have been considered.

4.3.22 The new buildings will be visually connected to the existing school and would be seen against the backdrop of the existing school buildings.

4.3.23 The *space* created for the new classrooms and canteen/Forest School café balances the need to accommodate essential functional space to support the new teaching and outdoor provision; the benefits of co-locating the facilities close to the existing school buildings and the benefits of siting the new Forest School café in a location where it can be accessed, (by invitation), by other community groups; and minimising potential impact on the landscape.

4.3.24 The proposed landscaping and the planting of the copse will help to further reduce any potential visual impact of the three new buildings. In addition, new hedgerows will be introduced between the buildings and the horticultural study area and between the parking area and the existing school site.

4.3.25 There are no public footpaths running through the site and any views from Harlington Road will be limited to oblique views. The boundary to Harlington Road is tree-lined.

4.3.26 It is therefore concluded that the proposals will not cause any significant impact on the "openness" of the Green Belt.

4.3.27 It is also necessary to consider whether the building conflicts with the purposes of including land within the Green Belt.

4.3.28 The five purposes of designating land as Green Belt are:

- To check the unrestricted sprawl of large built-up areas.
- To prevent neighbouring towns merging into one another.
- To assist in safeguarding the countryside from encroachment.
- To preserve the setting and special character of historic towns, and
- To assist in urban regeneration by encouraging the recycling of derelict and other urban land.

4.3.29 It is not considered that this specific site and this part of the Metropolitan Green Belt can be considered to be preventing neighbouring towns from merging into one another. Similarly, it is not considered that this specific site and this part of the Metropolitan Green Belt can be considered to be preserving the setting and special character of an historic town.

4.3.30 It is also not considered that considerations relating to encouraging the recycling of derelict and other urban land are relevant to this specific site and this part of the Metropolitan Green Belt due to its existing use, including the school site.

4.3.31 The most relevant considerations for this specific site and this part of the Metropolitan Green Belt are therefore considered to be the potential impact of the new buildings on the Green Belt purpose of checking the unrestricted sprawl of large built-up areas and assisting in safeguarding the countryside from encroachment.

4.3.32 The Green Belt boundary in this location extends to the north and south of the site and, particularly and substantially, to the west, preventing the unrestricted outward expansion of London in this location (whilst noting that this general area is by no means absent of development, most obviously of housing). The application site's individual contribution to this purpose must therefore be considered extremely limited,

whilst the clear and definitive boundaries supporting the purpose of this Green Belt will be unaffected by the proposal.

4.3.33 Very similar considerations apply in respect of assisting in safeguarding the countryside from encroachment. The site represents a very small extension to an existing (school) facility in the Green Belt, represents a very small proportion of open land to the north, and the site will still border substantial areas of open land to the north and west.

4.3.34 If there is considered to be any harm to this purpose it must, on balance, be considered to be very limited.

4.3.35 It is therefore concluded in relation to the key Green Belt consideration of the harm caused by inappropriate development to the aim and purposes of the Green Belt that, if any harm is caused, it is extremely minor.

4.3.36 As a consequence of this conclusion, it is necessary to consider whether very special circumstances exist to the extent that the potential harm to the Green Belt (as identified to be, at most, extremely minor) is clearly outweighed by other considerations.

4.4 Very Special Circumstances

4.4.1 Having assessed harm, it is necessary to establish the benefits arising from the proposals. These "very special circumstances" can be summarised as follows:

- A compelling need for the development.
- The lack of any "brownfield" sites that are suitable, feasible and available.
- The overriding benefits for the local community.

4.4.2 We deal with each of these in turn.

(i) Compelling need for the development

4.4.3 It is readily apparent that there is substantial and significant need for the specific facilities being proposed for Hillingdon Manor School.

4.4.4 This need is supported by Central Government's and Hillingdon's aims that there should be a sufficient choice of local school places to meet the needs of existing and new communities. Additionally, there is a growing nation and local need for additional school places for children with Autism and learning disabilities. There are currently approximately 700,000 autistic adults and children in the UK (National Autism Society, 2019) and, across all schools in England, the number of pupils with special educational needs (SEN) is rising, reaching nearly 15% of all pupils (1,276,215 children) in January 2018.

4.4.5 Autistic Spectrum Disorder remains the most common primary type of need for pupils with a statement or Education Health Care Plan (EHC plan), with nearly 30% of pupils with a statement or EHC plan having this primary type of need in January 2018. The percentage of pupils with statements/EHC plans attending independent schools is also increasing year-on-year, reaching over 6% in January 2018 (DfE, 2018).

4.4.6 It is becoming even more important to ensure that young people with ASC are given the support and help needed to lead independent lives after they have finished school.

4.4.7 In the London Borough of Hillingdon in January 2018 there were 7,930 pupil attending state and independent schools who have SEN/EHC Plans, representing over 14% of the school population. With an increasing population in the borough, the number of children with additional educational needs is expected to rise over the next five years.

4.4.8 As a result of this increasing need, the Council published the *"Additional Needs Strategy Developing Local Provision for Children and Young People with Additional Needs in Hillingdon 2017-2021".* The report sets out a strategy for developing local educational provision to meet predicted needs of children and young people living in the Borough.

4.4.9 The Council's commitment is to "enable as many children and young people as possible to have their additional needs meet locally, supporting inclusion in the local community and avoiding the need to travel long distances to school". The report is also intended to be evidence to *"support any building programmes to facilitate expansion"* (paragraph 1.2.4 of the report).

4.4.10 The report sets out a number of actions which need to be taken forward to ensure that future needs and provisions are meet. These include expanding the specialist provision in the borough and supporting developments in local further education provision; and working with independent/non-maintained schools to fill identified gaps in local provision and ensure improved outcomes for pupils with clear pathways to local provision and ultimately employment.

4.4.11 Within the London Borough of Hillingdon there are currently no other schools which provide post-16 years education for children with Autistic Spectrum Conditions (ASCs) and there are only six schools in nearby boroughs that offer post-16 qualifications. Of these six schools, only Buckinghamshire College of Agriculture offers a similar curriculum to Hillingdon Manor School. It does not, however, have a specific ASC curriculum.

Local Planning Authority	**Number of schools**	**Number of schools with a specific Autistic Spectrum Condition curriculum?**
Hillingdon	Only Hillingdon Manor School	1
Hounslow	2	1
Ealing	1	0
Brent	0	0
Buckinghamshire	1	0
Harrow	0	0
Surrey	1	1
RBKC	0	0
Slough	0	0
Windsor & Maidenhead	1	0

Source: Hillingdon Council, 2019.

4.4.12. Hillingdon Manor School has experienced a demand in students choosing food technology and horticulture courses over the last five years which lead to recognised ASDAN and BTEC qualifications. This increase is anticipated to continue as many students attending the school apply for vocational courses rather than applying for GCSE pathways.

4.4.13 The proposed development will provide school places for up to 15 post-16 students from 2020. There are currently 41 pupils on the existing referral and waiting list.

4.4.14 To support students on the ASDAN and BTEC courses, the school provides access to a learning kitchen. The learning kitchen can accommodate up to eight pupils at any one time and currently there are 64 pupils who have regular access. There is, in addition, demand from another 50-60 students who cannot be accommodated due to the size of the existing kitchen. The proposal includes an additional kitchen to allow pupils to learn new skills using workspaces and appliances similar to those in their own homes, thus facilitating the transference of skills. These skills then in turn can be used in an employment setting.

4.4.15 The school currently has no facilities to enable students to study for horticulture qualifications. The closest providers with options for land-based studies and horticulture onsite are Capel Manor in Enfield (36 miles) and Buckinghamshire College of Agriculture in Maidenhead (24 miles).

4.4.16 The school has no allotments or space to grow vegetables or fruits on the existing site. To enable the pupils to gain skills in horticulture, the pupils have to leave the site and use a local allotment. The proposed development includes space for horticulture uses including perennial raised beds, space for growing fruit vines and moveable polytunnels. These new facilities will allow for the school to extend the range of qualifications available to the students including new qualifications in Land Based Studies.

4.4.17 There is, therefore, considered to be a compelling need for the proposals such that "very special circumstances" exist to significantly and demonstrably outweigh any very minor harm to the Green Belt.

(ii) Lack of alternative brownfield sites

4.4.18 The identification of alternative sites that are suitable, feasible and available poses significant practical challenges.

4.4.19 There are clear and demonstrable reasons for co-location of new school facilities with an existing school. In the case of Hillingdon Manor School and its specialist provision, infrastructure and expertise, it is essential. In addition, the creation of the Forest School area and horticultural study area requires, by definition, access to open space.

4.4.20 Planning policy objectives, both generally and in relation to inappropriate development and Green Belt land, seek to direct development to previously-developed land. Whilst that can be considered, in the majority of instances, an understandable aim, in a location such as Hillingdon (and indeed in this part of west London), it is wholly impractical to seek to identify and secure an area of brownfield land with immediate access to open land for the Forest School/horticultural study area of the size required to accommodate the whole (expanded) school.

4.4.21 Furthermore, it must be considered highly likely that in the event that such a "brownfield" site was identified as available and financially viable for purchase, planning policy objectives at a national, strategic and local level would indicate a strong preference for its redevelopment for priority uses, most obviously housing.

4.4.22 Alternative sites are therefore most likely to represent other "green field" sites which are already in use for some form of open sport, recreation, leisure or amenity. Once again, even on the assumption that a site of sufficient size could be identified as available and financially viable for purchase, it is likely that planning policy issues (conflicts) would be raised as the result of, for example, the loss of public open space or other amenity use or sports/recreation provision.

4.4.23 The school did, necessarily, consider the potential of accommodating the new facilities within the existing built area of the site. It is apparent that the site could not readily accommodate three additional buildings

of the size proposed (the minimum size requirements), whilst siting the new facilities away from the Forest School/copse and horticultural study area would undermine its fundamental objectives.

4.4.24 The absence of any realistic alternative site solution is therefore considered to represent very special circumstances which outweigh any very minor harm to the Green Belt.

(iii) Benefits to the local community

4.4.25 The proposals will deliver demonstrable and significant benefits to the local community over-and-above the educational provision through links to local community groups who will, by invitation, be able to visit the facilities. This will most obviously occur with visits to the Forest Schools café by organisations such as Mencap and Hillingdon Age UK, which in turn will be helping pupils fulfil elements of the hospitality modules of their studies.

4.4.26 These benefits to the local community are, therefore, considered to represent "very special circumstances" that significantly and demonstrably outweigh any minor harm to the Green Belt.

4.5 Other relevant planning policy considerations

4.5.1 Having considered the specific circumstances surrounding educational provision and development in the Green Belt, it is necessary to consider other relevant planning policy considerations relating to the proposal. A number of these have already been addressed with regard to Green Belt issues and these elements of the proposal are not repeated here.

4.5.2 These relevant planning considerations are considered to be:

(i) Design (including sustainability).
(ii) Landscape and visual impact.
(iii) Ecology (including ground conditions).
(iv) Travel.

(i) Design

4.5.3 Relevant planning policies in the London Plan and Hillingdon Local Plan focus on the importance of the design of new buildings enhancing the life of users and the neighbouring community, including the highest standards of energy conservation and inclusive and accessible design, and respecting the character and amenity of its neighbours (London Plan Policy 7.1, Policy 7.2, Policy 7.4, Policy 7.6; Local Plan Policies BE1, BE13, BE19, BE21).

4.5.4 The design of the new facilities has evolved from assessment of the site and its context, creating an integrated extension to Hillingdon Manor School. Much of the local context around the site is created by the existing flat roof of the 1960s main school building. The new development has some visual connection with this, whilst reflecting the rural character of the adjacent open land through the use of natural timber materials on the facades of the new buildings.

4.5.5 The arrangement of the new buildings creates spacing between them which, together with expansive glazing and integrated planting, creates a transparency and openness around the new built form.

4.5.6 The development will achieve the highest standards of accessible and inclusive design, being capable of being used easily and with dignity by all. The buildings, single storey and of modular design, reflect the

main school site in form and function and provide an appropriate response to the need for additional accommodation.

Assessment

4.5.7 The design principles have been substantially set out in the context of Green Belt considerations. It is apparent that the location, design and arrangement of buildings across the site represent an appropriate solution to the creation of the new facilities as an extension to the existing school site and within the Green Belt.

4.5.8 Further details relating to the design of the building are set out in the Design and Access Statement. It is considered that the building's design accords with the Framework, relevant London Plan policies and relevant Hillingdon Local Plan policies.

4.5.9 Section 14 of the National Planning Policy Framework highlights that the planning system should support the transition to a low carbon future and renewable energy (Paragraph 148). London Plan Policy 5.2 urges development proposals to make the fullest contribution to minimising carbon dioxide emissions and Policy 5.3 seeks the highest standards of sustainable design and construction. Policy 5.13 highlights the importance of sustainable urban drainage systems (SUDS), aiming to achieve greenfield run-off rates, while ensuring that surface water run-off is managed as close to its source as possible. This is in accordance with Local Plan Policy EM6: Flood Risk Management.

Assessment

4.5.10 The development seeks to achieve reductions in carbon dioxide emissions through efficient design and effective use of low and zero carbon technologies.

4.5.11 The new buildings are of off-site modular construction, facilitating the re-use and recycling of the construction (one of the buildings will be relocated from elsewhere on the school site) as well as minimising construction processes, travel, minimising demolition and excavation waste.

4.5.12 The construction will be built to exceed Building Regulations Part L 2013 performance, including the use of increased levels of insulation and the incorporation of green roofs.

4.5.13 The capture of rainwater and grey water harvesting will be incorporated to service the new classroom sanitary facilities and for the irrigation of the new horticultural study area.

4.5.14 Potential heat generation/overheating has been minimised through the use of minimal glazing areas to the south elevations of the new buildings.

4.5.15 All heating to the new buildings will be electric, facilitating inclusion of renewable energy supply sources.

4.5.16 Surface water drainage features will be designed according to SUDs principles.

4.5.17 It is therefore considered that the proposals meet relevant planning policies relating to design principles, sustainability and energy conservation and sustainable drainage.

(ii) Landscape and visual impact

4.5.18 Issues relating to landscaping and visual impact have been substantially set out in the context of Green Belt considerations.

4.5.19 Details relating to landscape and visual impact are set out in the Design and Access Statement. The proposals are visually attractive as a result of good architecture and appropriate landscaping.

Assessment

4.5.20 It is considered that the proposals secure appropriate landscaping and accord with relevant planning policy objectives.

(iii) Ecology (including habitats and trees)

4.5.21 The National Planning Policy Framework expects planning decisions to contribute to and enhance the natural environment (Paragraph 170) and London Plan Policy 2.18 recognises the resulting social benefits that promote individual and community health and well-being. Policy 5.10 promotes the integration of green infrastructure within new developments, including tree planting, green roofs and soft landscaping. London Plan Policy 7.19: Biodiversity and Access to Nature and Hillingdon Local Plan Policy EM7: Biodiversity and Geological Conservation encourage the protection and promotion of biodiversity in development projects. Hillingdon Local Plan Policy OL26: Protection and enhancement of trees, woodland and landscape features seeks appropriate responses to trees within development proposals.

Assessment

4.5.22 A Preliminary Ecological Appraisal and an Arboricultural Impact Assessment have been undertaken. These studies included the whole of the open field to the north of the existing school site to ensure the fullest understanding of the existing situation and potential impacts of the proposed development.

4.5.23 The main findings of the Preliminary Ecological Appraisal were that the land comprised a grassland field with scrub and boundary trees. This land could provide suitable habitat for a range of animal, birds and reptiles. As the habitats could be suitable for reptiles and great crested newt, further surveys are being undertaken to assess the presence or absence of these species to inform, if necessary, whether any appropriate mitigation is required.

4.5.24 The Tree Survey confirmed that none of the trees within the site are protected by a Tree Preservation Order, and that the site is not situated within a Conservation Area. The most significant trees surveyed are the Category A and B specimens located adjacent to the southern boundary of the site. A Category A tree group, is off-site, to the north. The proposals will require the removal of two trees, a low quality willow and a young Elm assessed as unsuitable for long-term retention due to the likelihood that it will succumb to Dutch Elm Disease within a short timeframe.

4.5.25 The Arboricultural Impact Assessment notes that some development will occur within the Root Protection Area of two trees. The layout of the scheme has been amended during the design process to reduce the impact on these two trees and the Assessment concludes that, subject to the adoption of appropriate and typical protective measures during construction, no significant harm would be caused to the retained trees.

4.5.26 It is therefore considered that, subject to any appropriate and proportionate mitigation measures relating to habitat protection identified as a result of the further studies being undertaken, the proposal accords with relevant planning policies relating to ecology and habitat protection.

4.5.27 A Geoenvironmental Desk Study/Preliminary Risk Assessment Site Investigation identified only limited and low potential sources of contamination on site, and none requiring further investigation or potential remediation.

(iv) Travel

4.5.28 The objectives of planning policy at a national, strategic and local level to promote sustainable transport choices are recognised and supported. Paragraph 108 of the National Planning Policy Framework states that appropriate opportunities to promote sustainable transport modes should be taken up, given the type of development and its location, with safe and suitable access provided for all users. Paragraph 110 expects, inter alia, applications to address the needs of people with disabilities and reduced mobility.

Assessment

4.5.29 The school has a high demand for parking within the site for the dropping-off and picking-up of pupils and staff, and the requirement for specialist staff to often travel significant distances to the school. It is often the case that the existing car park is full and overspill parking occurs along the site access road.

4.5.30 No new car parking is proposed. The proposed development will utilise the existing pedestrian and vehicular access and will include marking out of 12 parking spaces (including one disabled car parking space) in a new parking area adjacent to the new Forest Schools café. This marked parking area is intended to provide waiting space within the school grounds for people when they drop off or pick up their children and for community group vehicles when invited to visit the café, thereby removing the overspill parking on the access road.

4.5.31 It is therefore considered that the proposal meets the objectives of relevant planning policies.

4.6 Balance in planning decisions

4.6.1 The proposals seek to provide modern educational facilities to support the continued and enhanced use of the site as a school with specialist facilities for children and young people with ASC.

4.6.2 As a result of the site's location in the Green Belt, whilst the proposed use of the open land for horticulture and Forest School reflect uses typically associated with the Green Belt, the siting of the two teaching buildings and canteen/café and associated parking area and walkways requires a planning assessment of their impact on the aim and purposes of designating land as Green Belt. The extent of this impact must then be balanced against the benefits of the proposal. Any harm considered to be caused to the aim and purposes of designating this land as Green Belt must be outweighed by the benefits such that very special circumstances are considered to exist and planning permission can be granted.

4.6.3 It is considered that the demonstrable need for the new facilities, the absence of viable alternative sites, the absence of material harm to the long-established objectives of including land within the Green Belt, the absence of negative impact in terms of the openness of the Green Belt and the high level of planning policy compliance against a wide range of other planning policy objectives indicates that very special circumstances do exist to allow planning permission to be granted.

5.0 Conclusions

5.1.1 Hillingdon Manor School is seeking planning permission for the enhancement of its existing secondary school site at Harlington Road, Hillingdon.

5.1.2 The proposals seek to provide additional specialist facilities to support the school's objectives of providing education and life opportunities for children and young people with ASC.

5.1.3 The new facilities will allow the school to provide an outdoor Forest Schools area (located within a newly planted copse) and a horticultural study area. Associated classrooms, canteen/café and parking area are also included.

5.1.4 The creation of these new facilities, the only ones in the London Borough of Hillingdon, will meet a real, demonstrable and significant need, bringing benefits to the borough and the wider community.

5.1.5 The facilities will enable current and future pupils to study for additional BTEC and ASDAN qualifications and to develop skills which will enable them to access jobs in the future. The qualifications will enable the pupils to gain practical experience and nationally recognised qualifications whist increasing their self-awareness, self-regulation, independence, communication and social skills.

5.1.6 The existing buildings of the school do not allow for this provision. It can only occur with the new facilities.

5.1.7 Co-location of the new facilities with the existing school and its teaching and physical infrastructure is essential. Location adjacent to the open space necessary for the Forest School and horticultural study area is equally essential.

5.1.8 The planning application therefore promotes an exciting vision to provide a new home for Land Based studies.

5.1.9 The existing school and site of the new facilities are located within the Green Belt. Whilst the horticulture and Forest School activities are typically associated with Green Belt uses, the primary education function of the land and buildings requires an assessment of their impact on the aim and purposes of designating land as Green Belt. Any harm considered to be caused to the aim and purposes of designating this land as Green Belt must be outweighed by the benefits such that very special circumstances are considered to exist and planning permission can be granted.

5.1.10 A comprehensive review has been undertaken of the existing school site, the adjacent open land and the educational space needs to determine the siting, style, amount and design of the new facility, ensuring that it will respect its Green Belt location.

5.1.11 This exercise identified a requirement for four classrooms in two single-storey modular buildings (one relocated from elsewhere on the school site) and one single-storey modular building for a canteen/café. A new Forest School area within a newly planted copse and horticultural study area comprising planting beds, temporary polytunnels and a chicken run form the key learning elements of the new facility.

5.1.12 There is a demonstrable need for further specialist facilities for post-16 year olds, and a clear demand for Land Based Studies to enhance educational, vocational and life skills opportunities.

5.1.13 Whilst the educational benefits are considered to be significant and responding to identified need, there is an obvious lack of viable and available alternative sites, and the design and siting of the new buildings

responds to its context by specifically addressing the potential impact on the openness of the Green Belt and on the potential visual impact on the Green Belt.

5.1.14 As a consequence, it is considered that "very special circumstances" clearly outweigh any marginal potential harm to the Green Belt, as well as any other potential harm.

5.1.15 It is therefore considered that the application proposals will provide the following key benefits:

- Provide a new specialist education facility that will enable Hillingdon Manor School to maintain, develop and expand its support of children and young people with ASC and their families.
- Provide a secure and viable location for Hillingdon Manor Secondary School in the long-term.
- Deliver a significant gain in specialist educational provision within Hillingdon and north-west London.