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Your Ref: PP-13024379

24 June 2024

Chris Brady
Area Team Leader
Hillingdon Council
Civic Centre
High Street
Uxbridge
UB8 1UW

Dear Chris,

Building 3, Brunel University London, Uxbridge UB8 3PH

Notification for Prior Approval for the proposed erection of university building located on existing car parking site – Town and Country Planning (General Permitted Development) Order 2015 (as amended Schedule 2, Part 7, Class M)

We write on behalf of our client, Brunel University (the 'Applicant'), to submit a prior approval application for the following proposed development at Brunel University London, Uxbridge UB8 3PH ('the Site'):

"Prior approval for the erection of a single storey university building containing flexible space for teaching and student use (Use Class F1) under Schedule 2, Part 7, Class M (extensions etc for schools, colleges, universities and hospitals) of The Town and Country Planning (General Permitted Development) (England) Order 2015 (As Amended)".

This application forms one of three applications for Prior Approval at different locations within the Brunel University campus. These applications collectively aim to facilitate urgent emergency improvement works to university buildings, prompted by recent discoveries revealing the presence of reinforced autoclaved aerated concrete (RAAC) within certain university buildings.

1. Application Package

In addition to this cover letter and application form, the application is accompanied by the following documents:

- Application Form;
- Planning Drawings (prepared by RSS):
 - Site Location Plan;
 - Block Plan;
 - Existing and Proposed Floor Plans;
 - Existing and Proposed Elevations;

- Existing and Proposed Sections;
- Existing and Proposed Roof Plan;
- Design and Access Statement (prepared by RSS);
- Transport Statement (prepared by Evoke Transport);
- Heritage Statement (prepared by Alan Baxter); and
- Arboricultural Method Statement (prepared by Arborhelp).

The application fee of £120 + £70 administration fee has been paid online via the Planning Portal.

2. Context

Following urgent investigations, it has become evident that the Brunel University London University Buildings contain large amounts of RAAC, a form of lightweight concrete which is prone to failure.

Brunel University London have undertaken visual and intrusive surveys as well as 3D scans to determine the condition of the RAAC, the presence and extent of reinforcement, as well as level of deflection from when new. These investigations have confirmed that it is not possible to bring the buildings back into use until further investigations are carried out and remedial works identified. This means that 13,000 sqm of floorspace is currently unable to be used, depriving Brunel University of a large area of vital specialist teaching space.

The University is currently temporarily using buildings (associated with the filming work that takes place on this site) located on the edge of the campus on an emergency basis. However, as the actors' and writers' strikes have now come to an end, these buildings are required again for filming. As such, Brunel University London must find new specialist teaching space as quickly as possible for the new academic year, starting in September 2024.

All of the existing buildings on the campus are in use, with additional pressure applied as a result of the Buildings being vacated. As such, in order to ensure that teaching is able to continue on campus, Brunel University London has no choice but to urgently construct new buildings for these specialist teaching spaces whilst further investigation and remedial works take place on the University Buildings.

3. The Site

The proposed development comprises 600 sqm and is located on the southern end of the existing car park on the east of the Russell Building on the outer edge of the university science park. The site is bounded by university buildings on all sides and adjacent to the BCAST offices in the Gardiner Building.

The wider Brunel University site comprises a collection of buildings currently forming part of the university. It is the only single campus University in London, located in Uxbridge. The University currently has circa 14,600 students and employs 2,380 professional and academic staff, and the University is recognised as a quality provider of higher education allied to industry with a strong and growing research function. It was established in 1966 and has been subject to continuous growth since.

The site is located within the Green Belt. The site has a Public Transport Accessibility Level (PTAL) of 1b, indicating low access to public transport, and the eastern boundary of the site is within Flood Zone 1 indicating a low probability to flooding.

There are no Tree Preservation Order (TPO) areas on the site. The site lies within an Air Quality Management Area.

The site is not located within or adjacent to a conservation area, however there is a Grade II listed Lecture Theatre Block building located approximately 100 metres to the east of the site at its closest point, along with locally listed Laboratory Buildings to the east and a Library to the northeast.

The campus as a whole extends to approximately 78ha and is located approximately 1km (at its closest point) south of Uxbridge town centre, within the London Borough of Hillingdon (LBH).

4. Compliance with Class M

Schedule 2, Part 7, Class M of the Town and Country Planning (General Permitted Development) Order 2015 (as amended) 'extensions etc for schools, colleges, universities, prisons and hospitals' permits the following:

"The erection, extension or alteration of a school, college, university, prison or hospital building."

The existing buildings on the site comprise university buildings, or buildings containing uses that are ancillary to the main university use (Use Class F1(a)).

Following a pre-application meeting with LBH Officers in December 2023 and subsequent site visit in January 2024, Officers confirmed that the prior approval route was deemed an appropriate route for the proposed works.

Class M outlines specific clauses under which development is not permitted. These have been compiled in the table below, along with a checklist demonstrating the site's compliance.

M.1 Development not permitted by Class M If-	
Clause	Site Compliance
<p>(a) if the cumulative footprint of any erection, extension or alteration under Class M on or after the relevant date would exceed the greater of –</p> <p>(i) 25% of the cumulative footprint of the school, college, university, prison or hospital buildings as it was on the relevant date; or</p> <p>(ii) 250 square metres;</p>	<p>The footprint (that is the area occupied by buildings) of the Brunel University London campus is approximately 83,000 sqm on the relevant date (this being 21st April 2021 as defined in the General Permitted Development Order). The proposed development of the building totals 518 sqm, and so would fall significantly below 25% of the cumulative footprint of the university (c. 21,000 sqm).</p> <p>This criterion is therefore met.</p>

(b) in the case of a college, university, prison or hospital building, if any part of the development would be within 5 metres of a boundary of the curtilage of the premises;	None of the proposed sites for the new buildings would be within 5 metres of a boundary of the curtilage of the premises. This criterion is therefore met.
(ba) in the case of a school, where any land adjacent to the site is used for a purpose within Part C of the Schedule to the Use Classes Order (residential purposes), if any part of the proposed development is within 5 metres of the boundary of the curtilage of that residential land;	This only applies to schools, so this criterion does not apply.
(c) if, as a result of the development, any land used as a playing field at any time in the 5 years before the development commenced and remaining in this use could no longer be so used;	None of the sites are, or have been used, as a playing field. This criterion therefore does not apply.
(d) if the height of any new building erected would exceed— (i) if within 10 metres of a boundary of the curtilage of the premises, 5 metres; or (ii) in all other cases, 6 metres;	The Applicant is proposing high quality prefabricated buildings that are up to 6 metres in height. This is shown within the proposed elevations submitted with this application. This criterion is therefore met.
(da) if the height of any rooftop structure would exceed 1.5 metres;	No rooftop structures proposed. The criterion is therefore met.
(e) if the height of the building as extended or altered would exceed— (i) if within 10 metres of a boundary of the curtilage of the premises, the lesser of the height of the building being extended or altered or 5 metres; or (ii) in all other cases, the height of the building being extended or altered;	This does not apply as the buildings would not extend or alter existing buildings.
(f) if the development would be within the curtilage of a listed building; or	The buildings would not be within the curtilage of a listed building. This criterion therefore does not apply.
(g) unless— (i) in the case of school, college or university buildings, the predominant use of the existing buildings on the premises is for the provision of education; (ii) in the case of hospital buildings, the predominant use of the existing buildings on the premises is for the provision of any medical or health services;	As above, the buildings would not be within the curtilage of a listed building; in any case the Grade II listed Lecture Centre is in use for the provision of education. This criterion does not apply.

(iii) in the case of prison buildings— (aa) the predominant use of the existing buildings on the premises is for the confinement of prisoners; and (bb) in the case of a closed prison, the development does not involve the erection, extension or alteration of any building beyond the perimeter as it stood on the relevant date.	
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The site and proposed development are therefore in full accordance with the qualification criteria set out under Class M and the development benefits from the permitted development subject to meeting the conditions set out under paragraph M.2. These have been assessed below.

Conditions

Paragraph M.2 sets out further conditions that development permitted by Class M must meet. These requirements have been set out within the table below and then assessed in turn.

Paragraph M.2 Development is permitted by Class M subject to the following conditions—	
Clause	Site Compliance / Acceptability
(a) the development is within the curtilage of an existing school, college, university, prison or hospital;	The development falls within the curtilage of Brunel University London. This criterion is therefore met.
(b) the development is only used as part of, or for a purpose incidental to, the use of that school, college, university, prison or hospital;	The development is proposed to be used for flexible spaces for teaching and student use associated with Brunel University London. This criterion is therefore met.
(c) any new building erected is, in the case of article 2(3) land, constructed using materials which have a similar external appearance to those used for the original school, college, university, prison or hospital buildings;	Article 2(3) land is defined within Schedule 1 Part 1 of the GPDO as land within – (a) an area designated as a conservation area under section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (designation of conservation areas); (b) an area of outstanding natural beauty; (c) an area specified by the Secretary of State for the purposes of section 41(3) of the Wildlife and Countryside Act 1981 (enhancement and protection of the natural beauty and amenity of the countryside); (d) the Broads; (e) a National Park; and (f) a World Heritage Site.

	The development would not fall on any of these sites and so this condition does not apply.
(d) any extension or alteration is, in the case of article 2(3) land, constructed using materials which have a similar external appearance to those used for the building being extended or altered	This condition does not apply.
(e) where proposed development under Class M relates to the erection, extension or alteration of a school building that results in an increase in the school's published admission number, the developer must, within a period of six months starting with the date the development is completed, submit to the local planning authority a travel plan for the site;	Only applies to schools, and so this condition does not apply.
(f) where proposed development under Class M relates to the erection, extension or alteration of a university building, development is permitted subject to the condition that before beginning the development the developer applies to the local planning authority for a determination as to whether the prior approval of the authority will be required as to— (i) transport and highways impacts of the proposed development; (ii) the design and external appearance of the erection, extension or alteration; or (iii) the impact of the development on heritage and archaeology;	Compliance with this criterion is set out within the section below, which concludes that this criterion is satisfactorily met, affirming the suitability of the proposed development.

Transport and Highways Impacts

The development as a whole, including the other two sites presented under different applications, would result in 287 parking spaces currently provided within the Brunel University Campus being made unavailable. This comprises 191 spaces for Building 1, 44 spaces for Building 2, and 52 spaces for Building 3.

A Transport Statement accompanies the proposal, demonstrating that the parking being made unavailable will not adversely impact the local highway network or lead to overspill parking. The development does not introduce additional impacts on transport and highways; rather, it involves transferring existing activities within the university to a new building, within the existing pool of staff and students.

Moreover, the Travel Plan secured within the S106 agreement for the implemented Masterplan Consent (ref. 532/APP/2002/2237) sets a maximum provision of 2,088 parking spaces across the entire campus. This threshold will not be exceeded even with the 283 parking spaces being made unavailable, and the proposed development does not alter the maximum provision allowed under this consent. Further to this, the sites will revert to their existing state at the end of their lifetime, with the parking spaces made available again for use.

The current post-COVID hybrid staff working pattern further supports the sufficiency of parking capacity to accommodate the loss of spaces without causing parking issues on surrounding streets. The university commits to actively monitoring the parking situation and implementing mitigation measures if necessary.

Therefore, considering the development as a whole, including the other two sites, the parking spaces being made unavailable will not adversely impact the local highway network or lead to overspill parking.

Additionally, swept path analysis has been completed for a refuse vehicle, fire tender, and large car for each proposed building. This analysis demonstrates that appropriate servicing and delivery arrangements will be afforded and that existing operations, such as through routes, will not be affected.

Overall, the proposals comply with part (f)(i) of the criterion.

Design and External Appearance

The proposed development has been strategically situated to the south of the existing car park, prioritising efficient transport movement and minimising disruption to existing campus infrastructure. Building 3 comprises a single modular structure of 20m x 25m frame, complemented by surrounding mature trees, ancillary spaces and entrances.

The materiality of the proposed building reflects a sympathetic colour scheme, ensuring it harmonises with the surrounding context. The building is predominantly grey in colour, with a section in a brighter blue for visual interest as discussed during pre-application discussions. The building will feature a precast, lightweight, clad structure with a shallow pitched roof with solar panels and rectangular windows.

Detailed design drawings and the Design and Access Statement prepared by Rivington Street Studios further illustrate the proposed design elements and their integration into the university campus context.

Overall, the proposals comply with part (f)(ii) of the criterion.

Heritage and Archaeology

While the buildings are not located near the Grade II listed Lecture Centre and the site is not within an Archaeological Priority Area, there are locally listed buildings existing on the site, and as such a Heritage Statement has been prepared.

Building 3 is situated beyond the immediate setting of the listed and locally listed buildings and obscured by other university buildings and thoroughfares, particularly given the low height of the proposed structures.

The Heritage Statement concludes that the proposals will have no or neutral impact on listed and locally listed buildings within the campus. This is due to the distance of the new buildings from heritage assets, whereby it was concluded to mitigate any potential harm to their settings. Further to this, the compact and sensitive design also ensures minimal impact.

Overall, the proposals comply with part (f)(iii) of the criterion, demonstrating sensitivity to heritage and archaeology considerations.

Conditions (g), (h), (i), and (j)

The remaining conditions (g), (h) and (j) set out procedural submission matters which the Applicant will have been met through this submission of the Prior Approval application and condition (i) relates to open prison buildings and so is irrelevant to the proposed development.

5. Summary

The evidence presented demonstrates that the proposed installation of new flexible teaching and student spaces meets all of the above criteria required to proceed with a Prior Approval application under Schedule 2, Class M, Part 7 of The Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended), and that prior approval should therefore be granted for the proposed development.

We trust that the enclosed forms and documents enable you to validate and determine the application without delay. Should you require any further details or have any queries, please do not hesitate to contact me or my colleague Lucy Fathers (07717 541 329).

Yours sincerely

A handwritten signature in cursive script that reads "Reece Harris".

Reece Harris
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For and on behalf of Avison Young (UK) Limited