

27th January 2026

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

Dear Chris,

Brunel University of London, Uxbridge UB8 3PW**Temporary Gym Extension of Time - Section 73 Application**

We write on behalf of Brunel University of London ('the Applicant') ('BUL') to submit a Section 73 application to extend the operational period of the temporary gym facility approved under planning permission ref. 532/APP/2020/1978 on 23rd April 2021, and to vary Condition 9 of the permission to secure the approved reinstatement of the land following removal of the gym. The proposal relates to land within 'Site 3' of the Brunel University of London Campus, Uxbridge, UB8 3PW (the Site).

1. Application Package

This letter provides a Planning Statement, and the application is accompanied by the following documents:

- Planning Application Form;
- Approved Planning Drawings:
 - Site Location Plan (ref. (SSL2766 02 Rev 4));
 - 'As built' Plans and Elevations (ref. 8164 03 01 Rev D);
 - 'As built' Site Plan (ref. 8164 03 02 Rev E);
- Draft Deed of Variation;
- Photographs of temporary gym facility;
- Gillespies Green Belt Review (2015);
- Brunel University of London Annual Financial Report (2024); and
- Reinstatement Plan (submitted in support of the proposed variation of Condition 9).

2. The Site and Surrounding Context

BUL operates from a 78 hectare campus located approximately 1km to the south of Uxbridge town centre. The campus is divided into 7 'sub-sites' (refer to the Site Plan within **Appendix I** for

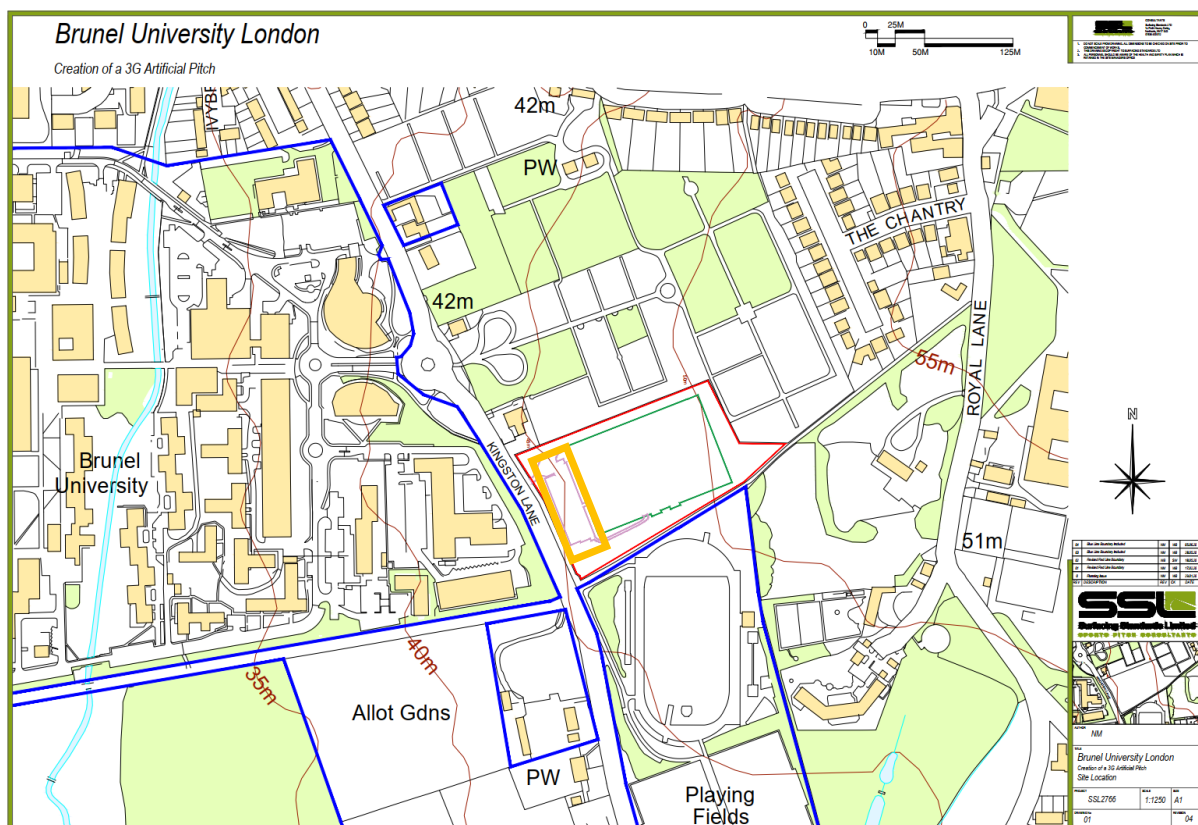
reference). The land subject to this application is located within 'Site 3' of the campus, to the east of Kingston Lane.

Site 3 extends to approximately 7.8 hectares and is divided by a public footpath into a northern and southern area. Vehicular access is taken from Kingston Lane, which forms the western boundary.

The application site itself is limited to the footprint of the temporary indoor gym building and its immediately associated land, located within the northern part of Site 3. This northern area also accommodates sports facilities including a permanent World Rugby compliant artificial grass pitch.

The temporary gym is positioned to the west of the artificial grass pitch, closest to Kingston Lane, and provides specialist strength and conditioning facilities ancillary to the rugby programme delivered in partnership with Ealing Trailfinders. The site location plan is shown in **Figure 2.1** below.

Figure 2.1 Site Location Plan (temporary gym depicted by orange line)



3. The Extant Planning Permission

On 23rd April 2021, the London Borough of Havering (LBH) granted planning permission (ref. 532/APP/2020/1978) at the Site for the following development:

"Upgrade of existing sports pitch to provide World Rugby Compliant 3G Artificial Grass Pitch with associated perimeter fencing and technical dugout recessed areas, erection of temporary gym facility, and associated works".

Further details of the approved layout and design are shown on the 'as built' plans and elevations submitted with this application.

The permission (the 'Extant Consent') granted a permanent 3G artificial grass pitch as well as consent for the erection of a temporary gym facility between the pitch and Kingston Lane, brought forward following BUL's association with Ealing Trailfinders which through this collaboration have created a Rugby Sports Programme.

The temporary gym facility was permitted for a fixed period of five years, as set out within the Section 106 Agreement of the Extant Consent. Accordingly, the gym is currently permitted until 23rd April 2026, five years from the date of the decision notice. In addition, Condition 9 of the planning permission required the submission and approval of a reinstatement plan demonstrating how the land occupied by the temporary gym would be returned to its original state following removal.

The Extant Consent was supported by a comprehensive planning case, including a Green Belt assessment and a Very Special Circumstances argument, which demonstrated that the very special circumstances associated with the gym facility outweighed the temporary harm to the Green Belt. These benefits included enhanced sports provision, educational opportunities, and community access, alongside the temporary nature of the development and its location within an established sports site.

4. Planning History

Development of the Uxbridge campus has been brought forward incrementally in a planned manner, in accordance with a series of masterplans dating back to the 1960s, the most recent one having been granted outline planning consent in 2004. It is understood that the BUL campus has been designated as Green Belt since prior to the existence of the campus, confirming that the development/expansion of the University has been found to satisfy Green Belt policy tests (Very Special Circumstances) on multiple occasions.

In 1990, the University prepared a Masterplan for the Uxbridge campus to cover development requirements up to 2000. This was granted outline planning consent in 1992.

The University proceeded to prepare a further masterplan for Sites 1 and 2 in the early 2000s, to guide development over the proceeding 10-15 years. This was granted outline planning consent in 2004 (application ref. 532/APP/2002/2237). The description of development is as follows:

"Brunel University master plan proposals comprising erection of 48,064 sq.m of new academic floorspace, 69,840 sq.m of new student residential accommodation, ancillary floorspace and infrastructure, provision of 645 additional parking spaces, improved access from Kingston Lane, new access from Cowley Road, highway improvements to Cleveland Road, improved pedestrian and cycle routes, landscaping and environmental improvements (involving demolition of 18,600 sq.m of existing floorspace) (outline application)".

The 2004 Masterplan has now been largely implemented and the planning permission has now expired.

5. The Proposed Development

The Proposed Development seeks to extend the operational period of the temporary gym facility approved under planning permission ref. 532/APP/2020/1978 for an additional ten years from the decision notice, until 23rd April 2036.

The rationale for this is set out in Section 6 below, but in summary the temporary gym facility supports BUL's Rugby Sports Programme, providing specialist strength and conditioning space that cannot currently be accommodated elsewhere on campus. The extension of time is sought to maintain continuity of provision while a permanent replacement facility is delivered. The Proposed Development does not involve any physical changes to the building, its use, or its layout; it relates solely to the timeframe for retention of the existing structure.

Deed of Variation

Schedule 3 of the Section 106 Agreement requires removal of the temporary gym structure, ensuring any impact on openness remains temporary and reversible. A draft Deed of Variation has been drafted to amend the relevant clause as follows:

- **Current wording:** "To remove the Gym Structure within 5 years of the date of the Planning Permission".
- **Proposed varied wording:** "To remove the Gym Structure within 15 years of the date of the Planning Permission".

As permission was granted on 23 April 2021, this amendment would extend the removal date from 23 April 2026 to 23 April 2036.

Condition 9 – Reinstatement of the Land

Planning permission ref. 532/APP/2020/1978 is subject to Condition 9, which requires submission and approval of a reinstatement plan prior to occupation. While a reinstatement plan document was prepared at the time of the original permission, the condition was not formally discharged.

To address this and ensure clarity and enforceability in light of the proposed temporary extension, the Reinstatement Plan document is submitted with this Section 73 application for formal approval. This ensures that the land will be reinstated appropriately following the temporary use of the gym building. It is proposed that Condition 9 be varied as a compliance condition, linked directly to the approved Reinstatement Plan, as set out below.

Condition 9 (Current wording):

"Prior to the occupation of the development a reinstatement plan demonstrating how the area of playing field utilised for the accommodation of the temporary gym will be returned to its original state, shall be submitted and approved in writing by the Local Planning Authority.

The approved reinstatement plan should be carried out strictly in accordance with the approved document and shall be completed in the first planting season following the removal of the temporary gym building or closure of the gym building, whichever is the earlier".

Condition 9 (Proposed varied wording):

"The temporary gym building approved under planning permission ref. 532/APP/2020/1978 shall be removed from the site in accordance with the terms of that permission, and the land shall be reinstated strictly in accordance with the Reinstatement Plan.

The approved Reinstatement Plan should be carried out strictly in accordance with the approved document and shall be completed in the first planting season following the removal of the temporary gym building or closure of the gym building, whichever is the earlier".

This approach secures the same outcome as originally intended, ensuring that the reinstatement requirement is clear, enforceable and directly linked to the Reinstatement Plan submitted with this application.

6. Rationale for the Extension of Time

The rationale for extending the temporary consent is grounded in both operational necessity and deliverability, as set out below.

Strategic Partnership and Delivery Timescales

The temporary gym facility supports a ten year partnership between BUL and Ealing Trailfinders Player Recruitment and Management, which enables high-performing rugby players to access higher education through a structured scholarship and referral pathway, which is a key component of BUL's wider performance sport strategy. The long term scope of this partnership provides a clear framework within which future infrastructure requirements can be anticipated.

Based on typical capital project cycles in higher education, delivery of a permanent facility would realistically require 3.5 to 5 years, including feasibility (6-12 months), planning and design (12-18 months), and construction (18-24 months), subject to funding availability. Given these timescales, a ten year extension is therefore considered to be both necessary and proportionate, providing continuity of provision while allowing sufficient time with appropriate contingency to secure funding and deliver a permanent replacement without disrupting the benefits currently being delivered to students, athletes and the wider community.

Financial Constraints Affecting Permanent Delivery

At the time the Extant Consent was granted, it was anticipated that a permanent facility could be delivered by April 2026. However, significant shifts in the higher education funding landscape have severely constrained the University's capacity to meet that objective within the original timeframe.

As with many UK universities, BUL faces acute financial pressures, which stem from a combination of declining international student applications, the Government's continued freeze on domestic tuition fees, and rising operational costs. These financial pressures have had a substantial impact on income and capital investment capability, shown as BUL's Annual Financial Report (December 2024) submitted with this application confirms a real terms income fall of £19.9 million over the 2023/24 academic year. This is due to a 13% decline in total student numbers, driven primarily by a 26% drop in postgraduate enrolments resulting in a projected deficit of £32.9 million for 2025. Redundancies of 364 staff (academic and professional services) have also already been implemented, impacting around 20% of staff. These have been compounded by the residual impacts of the Covid-19 pandemic, including increased demand for student financial support services and a shift towards hybrid learning models, both of which carry ongoing cost implications.

These pressures have required reprioritisation of estate investment, and while the gym remains a strategic priority, BUL is currently not in a financial position to deliver a permanent facility. A temporary extension is therefore important to safeguard the current provision.

Ongoing Public Benefits

The temporary gym facility continues to deliver significant and demonstrable benefits that remain relevant to the consideration of an extension of time. This section sets out how those benefits continue to be delivered, reinforcing the rationale for the proposed extension of time.

In terms of economic benefits, the facility provides both direct and indirect benefits within BUL and the wider community. As of 2025, it supports 22 full-time staff across a range of specialist roles, including programme management, coaching, strength and conditioning, physiotherapy and performance analysis for both the men's and women's rugby programmes. These roles are essential to the University's athlete development pathway and contribute to the retention of skilled professionals in the local area.

In addition, the facility supports a variety of short-term and part-time roles, including student employment during peak periods. It also hosts more than 20 year-long professional placement students annually, across disciplines such as coaching, medical support (including physiotherapy), operations, marketing and media, strength and conditioning, and performance analysis. These placements are embedded within academic programmes and provide students with valuable, hands on industry experience. Notably, five recent placement students have progressed into full-time employment with Ealing Trailfinders, demonstrating the facility's role in career development.

The gym facility also draws a range of external users, including school groups, amateur clubs and national governing bodies. This usage not only broadens access to specialist facilities but also contributes to the local economy through secondary spending on transport, accommodation, hospitality and other services. As such, the facility delivers a meaningful economic uplift beyond the University itself, supporting local businesses and strengthening community links. Its integration with the adjacent 3G pitch has also expanded access for underrepresented groups and non-mainstream sports.

Strategically, the gym plays a critical role in delivering BUL's Sport Strategy, which aims to increase both participation and performance across the BUL student body while enhancing overall wellbeing. It provides dedicated, high-performance space for strength and conditioning that was previously lacking, enabling student-athletes and community users to train in a safe, well-equipped environment. Its location immediately adjacent to the 3G pitch provides the high-performance strength and conditioning space required to operate seamlessly alongside pitch based training sessions. This co-location enables integrated training programmes, efficient session turnaround and direct supervision by coaching and medical staff. The proximity of the gym to the pitch is also essential to sustaining BUL's long-standing partnership with Ealing Trailfinders and supporting athlete development pathways from grassroots to elite levels.

By way of summary, the public benefits are as follows:

- Delivers significant economic benefits, including supporting 22 full-time staff, as well as a variety of short-term, part-time and student placement roles each year.
- Provides enhanced access to high quality sports facilities for both the University and the wider public.
- Delivers educational and community benefits, offering regular access for local schools, amateur clubs and wider community groups.
- Provides a dedicated, well-equipped strength and conditioning space, enabling student athletes and community users to train in a dedicated environment.

Overall, these ongoing benefits provide a robust justification for the extension of time for the facility's operation by allowing BUL to preserve these benefits without interruption, and supporting students, staff and local users during the transitional period required to deliver a permanent replacement.

7. Planning Policy Context

Section 38(6) of the Planning and Compulsory Purchase Act (2004) makes it clear that "If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise".

The Development Plan affecting the Site comprises the following:

- The London Plan (2021);
- Hillingdon Local Plan Part 1(LPP1) (Strategic Policies) (2012); and
- Hillingdon Local Plan Part 2 (LPP2) (Development Management Policies) (2020).

Relevant supplementary planning guidance includes the following Mayoral Adopted Supplementary Planning Guidance (SPG) and London Plan Guidance (LPG):

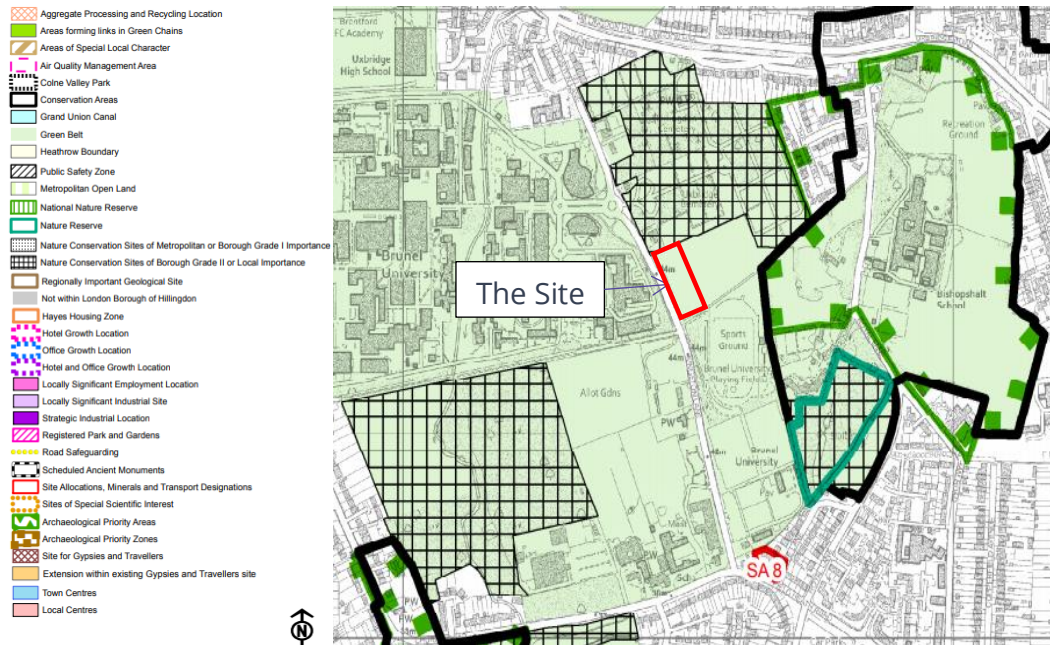
- Accessible London SPG (2014);
- Planning for Equality and Diversity in London SPG (2007);
- Public London Charter LPG (2021);
- Sustainable Transport, Walking and Cycling LPG (2022);
- Fire Safety (draft) (LPG).

The National Planning Policy Framework (NPPF) (December 2024) and associated Planning Practice Guidance are material considerations in the determination of planning applications.

Hillingdon Supplementary Planning Documents of relevance include Planning Obligations SPD (2014) and Accessible Hillingdon SPD (2017). The site does not fall within a Neighbourhood Plan area.

As shown within the Proposals Map extract below (**Figure 3.1**), the Site is located within the Green Belt. The policy context and planning designations remain unchanged since the Extant Consent was granted in April 2021.

Figure 3.1 LBH Adopted Policies Map (Site depicted by red line)



The Site benefits from good public transport accessibility, with a PTAL rating of 2-3.

Emerging Policy

Draft London Plan

Preparation of a new London Plan commenced in 2024, which will need to be prepared in the context of a revised National Planning Policy Framework. A high-level document 'Towards a new London Plan' was consulted on in May/June 2025, and the draft of the new London Plan is expected later in Summer 2026. As this remains an early consultation document it carries only limited weight as a material consideration at this stage.

Local Plan

The Council is currently reviewing and updating its Local Plan, which is at Regulation 18 stage.

On behalf of BUL, Avison Young submitted representations to the LBH Call for Sites consultation (September 2023) and the Regulation 18 draft Local Plan consultation (June 2024).

Avison Young also submitted further representations to make the case for the removal of BUL from the Green Belt as part of BUL's Call for Sites and Regulation 18 representations. This followed the Government's consultation on revisions to the NPPF, including on Green Belt policy, which ran from 30th July to 24th September 2024.

The next stages per the Council's Local Development Scheme are to advance of a second round of Regulation 18 consultation, which was expected in October/November 2025 but is now delayed, followed by Regulation 19 consultation which is scheduled to take place in April/May 2026.

Other Material Planning Considerations

Draft National Planning Policy Framework

The Government published an updated NPPF for consultation on 16th December 2025 until 10th March 2026. This currently carries limited weight as a material consideration until the NPPF is adopted. It is expected that this will take place in late Spring 2026.

Planning Practice Guidance

The Planning Practice Guidance (PPG) is an online planning resource that launched in March 2014 and brings together planning guidance on various topics together in one place. This guidance has subsequently been updated in line with more recent planning changes to the NPPF and is expected to be updated again upon the adoption of the draft NPPF. The PPG has been given due consideration in relation to the proposals, and subsequently the PPG forms an additional material consideration in the assessment of the Proposed Development.

8. Planning Assessment

This Planning Statement provides an assessment of the proposed amendment to the extant permission, having regard to adopted and emerging planning policy and guidance and other material considerations.

Principle of Development

The principle of development has already been established through the original planning permission (ref. 532/APP/2020/1978), which permitted the permanent 3G artificial pitch and the temporary gym facility for a five year period. This application seeks to extend the timeframe for retention of the gym by an additional ten years, until 23 April 2036. No physical changes are proposed. The reinstatement condition will remain, ensuring the impact on openness continues to be temporary.

London Plan Policy G2 and Policy EM2 of the Hillingdon Local Plan confirms that development within the Green Belt should not be approved except in very special circumstances, unless it falls within the exceptions set out in the NPPF. At the time the Extant Consent was granted, the gym facility was considered inappropriate development within the Green Belt and was therefore justified through a robust Very Special Circumstances (VSC) case, based on substantial educational, sporting, and community benefits, together with the temporary nature of the development. The VSC case, when considered collectively along with the temporary nature of the development, were considered for the Extant Consent to outweigh the harm to the Green Belt. Accounting for the proposed extension of time, this remains the case on the basis of the public benefits identified in Section 6 of this letter.

Since the Extant Consent was granted, there have been material changes to national planning policy, most notably the publication of the revised NPPF in December 2024. The updated framework introduces the concept of Grey Belt, defined as land in the Green Belt comprising previously developed land and/or land which does not strongly contribute to the purposes set out in paragraph 143(a), (b), or (d). Paragraph 143 of the NPPF identifies the five purposes of the Green Belt, with the relevant purposes for Grey Belt assessment being: to check the unrestricted sprawl of large built-up areas (143(a)); to prevent neighbouring towns merging into one another (143(b)); and to preserve the setting and special character of historic towns (143(d)).

We have therefore set out a Grey Belt case in this letter to support the principle of development.

Grey Belt Case

Paragraph 155 of the NPPF sets out the circumstances in which development on Grey Belt land may be considered acceptable. The Proposed Development meets all of the criteria set out in paragraph 155, as set out below.

- *Paragraph 155(a): The development would utilise Grey Belt land and would not fundamentally undermine the purposes of the remaining Green Belt.*
 - In accordance with paragraph 155(a) of the NPPF, the Proposed Development would utilise Grey Belt land and would not fundamentally undermine the purposes of the remaining Green Belt.
 - The Site forms part of an established sports complex within the BUL campus, comprising formal playing pitches, an athletics track, fencing, floodlighting, hardstanding and ancillary structures. The Site is visually and functionally contained within the wider campus and does not represent undeveloped or open countryside.
 - As demonstrated by the Gillespies Green Belt Review (2015), the Site performs poorly against the core Green Belt purposes, particularly in terms of checking unrestricted sprawl, safeguarding the countryside and preserving historic towns. The surroundings of the site have not significantly changed since this Review was carried out.
 - The Proposed Development involves no new development and no increase in built form, seeking only to extend the duration of an already approved temporary structure.
 - However, it is acknowledged that NPPG was updated in February 2025 to set out further detail on how the contribution land makes to the Green Belt should be assessed against purposes (a), (b) and (d) of NPPF paragraph 143. The Applicant has therefore summarised the findings of the Gillespies Green Belt Review for Site 3 against the updated analysis criteria within the NPPF below.

Table 8.1 Assessment of the site against the purposes of including land within the Green Belt

Purpose	Gillespies Review	Analysis against NPPG Illustrative Features
(a) to check the unrestricted sprawl of large built-up areas	No role as it is surrounded by land associated with a large urban conurbation.	Weak/None – the site is adjacent to a large built up area but the site and its surroundings are largely enclosed by significant existing development at BUL and Hillingdon.

<p>(b) to prevent neighbouring towns merging into one another</p> <p><i>Note that NPPG is clear that this relates to the merging of towns <u>not</u> villages.</i></p>	<p>Cannot prevent neighbouring towns from merging as it is located within an urban area and constrained and surrounded by it. There is no gap between settlements.</p>	<p>Weak/None – the site does not form part of a gap between towns. Hillingdon and Uxbridge merge into each other to the north of the site and with the BUL campus itself, and form part of a large urban conurbation. Hillingdon is also not identified as a town.</p>
<p>(d) to preserve the setting and special character of historic towns</p>	<p>There would be no intervisibility with the historic Hillingdon Village Conservation Area.</p>	<p>None – the site does not form part of the setting of a historic town.</p>

- It is therefore clear that Site 3 and the application site do not strong contribute to purposes (a), (b) and (d) in NPPF paragraph 143 for including land within the Green Belt. As such, the site comprises Grey Belt land and would not fundamentally undermine the purposes of the remaining Green Belt.
- *Paragraph 155(b): There is a demonstrable unmet need for the type of development proposed.*
 - In regards to paragraph 155(b) of the NPPF, there is a demonstrable unmet need for the type of development proposed. The temporary facility would continue to provide high-quality, accessible gym and sports provision within the University as well as for the wider local community. The need for such provision remains ongoing and is not currently met by existing facilities on or off campus.
 - The facility also delivers broader educational and community benefits, including access for local schools, amateur sports clubs and the wider public. These benefits were identified at the time of the Extant Consent and have continued to be delivered in practice, demonstrating that the need for the facility remains current and justified.
 - This unmet need is locationally specific given the strong relationship with the 3G rugby pitch. The gym plays an important role in supporting the University's Rugby Sports Programme and wider sports provision, and its location is functionally and operationally linked to the adjacent World Rugby-compliant 3G artificial grass pitch. This relationship is fundamental to the effective delivery of training and education programmes and means that the need for the facility is locationally specific, with no suitable alternative sites available within the campus that could provide the same level of integration. This need would be unmet if the temporary gym was removed without replacement at this point in time.
 - Since the granting of the extant permission, BUL has faced significant financial and operational constraints, including sector-wide financial pressures and RAAC-related building safety issues, which have delayed the delivery of a permanent

replacement facility. Extending the temporary consent by ten years will ensure continuity of provision during this period, safeguarding both the University's sports programmes and the associated public benefits while allowing sufficient time to secure funding and bring forward a permanent solution.

- As such, there is a demonstrable unmet need for the development proposed.
- *Paragraph 155(c): The development is in a sustainable location.*
 - With respect to paragraph 155(c) of the NPPF, the Site is located in a sustainable location. The Site lies immediately adjacent to the main BUL campus and within walking distance of Uxbridge Town Centre, ensuring strong functional integration with existing academic, residential and town centre uses.
 - The Site benefits from moderate public transport accessibility, with a PTAL rating of 2-3, and is served by a range of bus routes and nearby rail and Underground services within Uxbridge. The majority of users access the facility on foot, by bicycle or via public transport as part of existing travel patterns associated with the campus, therefore limiting reliance on private car use.
 - Further to this, the continued use of the gym facility makes efficient use of existing infrastructure and established access arrangements and does not require the provision of new highways works, parking, servicing areas or utilities infrastructure. The Proposed Development therefore represents a sustainable form of development, consistent with the objectives of the NPPF to direct development towards accessible locations.
- *Paragraph 155(d): The 'Golden Rules' for major housing development.*
 - With respect to paragraph 155(d), the Proposed Development is not a major housing development and does not therefore trigger the application of the 'Golden Rules' set out in paragraphs 156 and 157 of the NPPF.
- *The application of the policies under Footnote 7 of the NPPF*
 - The application of the policies under Footnote 7 of the NPPF relates to: policies for habitats sites /or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, a National Landscape, a National Park (or within the Broads Authority) or defined as Heritage Coast; irreplaceable habitats; designated heritage assets (and other heritage assets of archaeological interest); and areas at risk of flooding or coastal change.
 - The proposed development is for an extension of time which would not cause additional impacts on any of the relevant policies referred to above. As such the application of the policies under Footnote 7 of the NPPF do not represent a strong reason for refusing this planning application.

On the basis of the revised NPPF (December 2024), the application site qualifies as Green Belt land, and the proposed extension of time for the temporary gym facility satisfies all relevant criteria set out in paragraph 155. As such, the development is no longer considered inappropriate in Green Belt policy terms and constitutes an extension of time for development on the Green Belt that is acceptable in principle.

Overall, the proposed extension of time is considered justified and therefore acceptable in planning terms on the basis that it provides BUL with the necessary time to bring forward a permanent facility while responding to the exceptional financial circumstances currently facing the University. The temporary retention of the gym ensures uninterrupted delivery of the significant public benefits, including enhanced sports provision, educational opportunities and community access, that are linked to the adjacent 3G pitch.

Design

Paragraph 131 of the NPPF states that 'the creation of high-quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve'. The NPPF also notes that significant weight should be given to outstanding or innovative designs which promote high levels of sustainability, or help raise the standard of design more generally in an area, so long as they fit in with the overall form and layout of their surroundings (para. 139).

London Plan Policy D4 sets out the requirements for ensuring that development achieves and maintains high-quality design. Policy D4 requires proposals to be subject to appropriate design scrutiny, including through design and access statements, assessment by borough planning, design and heritage officers, and, where relevant, independent design review in accordance with the Mayor's guidance.

Policy BE1 of the Local Plan Part 1 (2012) requires all new development to improve and maintain the quality of the built environment to create successful and sustainable neighbourhoods. Policy DMHB 11 of the Local Plan Part 2 (2020) advises that development should be designed to the highest standards, taking account of scale, height, massing, building lines, streetscape rhythm and landscaping. Policy DMHB 12 of the Local Plan Part 2 (2020) reinforces the need for integration with the surrounding area.

The design of the development was established as acceptable under Extant Consent (ref. 532/APP/2020/1978). This application does not propose any changes to the built form, internal layout or external appearance. The only amendment relates to the timeframe for retention of the temporary gym. As such, there will be no additional design impacts beyond those previously assessed. The building remains visually contained within Site 3, screened by existing landscaping, and its temporary nature continues to be secured through the Section 106 Agreement.

Amenity

London Plan Policy D3 requires development proposals to provide appropriate outlook and privacy, while London Plan Policies D6 and D9 seek to ensure that the design of development delivers sufficient daylight and sunlight to new and surrounding housing and minimises overshadowing in a way that is appropriate to its context.

Policy DMHB 11 of the Local Plan Part 2 (2020) requires development to avoid adverse impacts on the amenity, daylight and sunlight of adjacent properties and open space.

The Proposed Development does not involve any physical alterations and therefore will not introduce new impacts. The building is proposed to remain in situ for an extended period, but its location within the campus and separation from residential properties ensures no additional harm to amenity beyond that previously assessed.

Highways

At all levels within planning policy there is a strong presumption in favour of reducing the need to travel, particularly by private car, and encouraging more sustainable modes of transport.

Paragraph 116 of the NPPF states that development should only be prevented or refused on highway grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

London Plan Policies T1, T2, T3, T4, T5, T6.4, and T7 set out the Mayor's policies on transport including minimum cycle parking requirements and maximum car parking requirements for development. Specifically, Policy T1 states all developments should make the most effective use of land, reflecting its connectivity and accessibility to existing and future public transport, walking and cycling routes.

Policy DMT 2 of the Local Plan Part 2 (2020) requires safe and efficient vehicular access, while Policy DMT 6 of the Local Plan Part 2 (2020) sets maximum parking standards.

The proposal does not alter the approved access arrangements, parking provision, or internal layout. Further to this, no additional trips will be generated beyond those associated with the existing use. As such, there are no highways or transport impacts beyond those previously considered acceptable.

Landscaping, Trees & Ecology

NPPF paras 158, 180, 185 and 186 encourage the conservation and enhancement of biodiversity.

Paragraph 131 of the NPPF states that the creation of high-quality, beautiful and sustainable places is fundamental to what the planning and development process should achieve. Paragraph 135 looks for developments to provide appropriate and effective landscaping. Developments should establish a strong sense of place. Paragraph 136 of the NPPF recognises that trees make an important contribution to the character of and quality of urban environments.

Policy DMHB 14 of the Local Plan Part 2 (2020) requires development to retain or enhance landscaping and biodiversity.

The proposal does not involve any changes to the approved landscaping scheme or tree cover. Existing mitigation measures remain in place, and the reinstatement condition ensures the land will be restored at the end of the extended period.

Flood Risk and Sustainable Drainage

NPPF paragraph 167 requires that, where appropriate, applications should be supported by a Site specific flood risk assessment. Paragraph 169 requires that major development incorporate sustainable drainage systems unless there is clear evidence it would be inappropriate. The systems used should take account of advice from the lead local flood authority; have appropriate proposed minimum operational standards; have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and where possible, provide multifunctional benefits.

London Plan Policy SI 12 requires development proposals to ensure that flood risk is minimised and mitigated, and that residual risk is managed. London Plan Policy SI 13 sets out that proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed

as close to its source as possible. There should be a preference for green over grey features and developments should follow the drainage hierarchy.

There are no new flood risk or drainage issues associated with this application, and a sustainable drainage scheme has already been approved under the Extant Consent (ref. 532/APP/2020/1978). The Applicant will continue to comply with these details, satisfying Local Plan and London Plan requirements.

9. Summary

Overall, the proposed extension of the operational period for the temporary gym facility is necessary to maintaining the continuity of BUL's Rugby Sports Programme and its associated educational and community benefits. The application does not involve any new physical development, and the impact on Green Belt openness remains temporary and reversible, secured through the existing Section 106 obligation and the Reinstatement Plan submitted with this application.

The proposal accords with the principles of sustainable development, and satisfies the criteria set out in paragraph 155 of the revised NPPF for development on the Grey Belt land. For these reasons, it is requested that the LBH grants planning permission for the variation sought.

We trust that this planning application provides all the necessary information and look forward to receiving formal confirmation of validation in due course. Please do not hesitate to contact me or my colleague Reece Harris (07442 369 100) should you require any further information.

Yours sincerely



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For and on behalf of Avison Young (UK) Limited



Appendix I – BUL Campus Site Plan

