

Planning Statement

Proposed expansion of existing school

at

Ruislip High School,
London Borough of Hillingdon

August 2017

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1 Introduction

1.1 Context

- 1.1.1 This statement accompanies the application for planning permission to extend the existing school development at Ruislip High School, Sidmouth Drive, Ruislip, London Borough of Hillingdon (LBH), HA4 0BY. Ruislip is an Academy Trust-run school, providing secondary education to sixth form level. The school is currently operating as a 6 form entry (FE) school and it is proposed to raise this to 7FE with special resource provision.
- 1.1.2 The body of the Design and Access Statement (DAS) contains a full description of the background to the development, site description and context, and site analysis.
- 1.1.3 The development proposals are also set out in the DAS including all material considerations for planning such as the design response, landscape design, access, parking, energy, sustainability etc. There is a suite of evidence-based reports of relevance to planning in the DAS appendices, to which this statement refers as necessary.
- 1.1.4 Consultations have been carried out with the school and the LPA, in line with the Government's policy encouraging such preapplication work, as set out in the National Planning Policy Framework (NPPF para 188-193).

1.2 Purpose of the Statement

- 1.2.1 In accordance with S38(6) of the Planning and Compensation Act 2004, decisions on applications must be made in accordance with the policies of the development plan, unless material considerations indicate otherwise.
- 1.2.2 This statement identifies the development plan covering the school site, reviews all of the relevant policies a decision maker is likely to need to address, and consider the extent to which the Ruislip High School proposal accords with those policies. As part of this, other material planning considerations are identified and included within the appraisal. Conclusions are drawn as to the overall suitability of the proposals for the approval of planning permission.

1.3 Site Description

- 1.3.1 The application site comprises the existing building and grounds of Ruislip High School, Sidmouth Drive, Ruislip, which is located approximately 1.4 miles to the South of the centre of Ruislip and 1.4 miles to the North of the A40. The A40 is considered a main arterial transport route into west London. The site is situated to the north of a sports field and to the south of Sidmouth Drive. The school is well served by public transport, with the Ruislip Gardens London Underground Station located 0.3 miles to the South and multiple bus stops located within a mile of the school.
- 1.3.2 The Ruislip High School grounds comprise approximately 1.9 ha and consist of a single three-storey school building. The school building is built with a sloped roof, and presents a variation of storeys and floorspace as a result of its uneven heights. It is located in the centre of the grounds, bordered by a car park to the South-West, associated sports pitches and open green space to the East and visitor drop-off and parking to the North. The school is somewhat shielded from public view, with a border of trees and existing buildings preventing views from the West, along West End Road, and a border of trees along the Southern boundary preventing views from the adjacent playing fields. The school is also protected from views along Dartmouth Road, the closest road located to the North-East, by a row of existing dwellings orientated towards Dartmouth Road. The school is, however, visually prominent along Sidmouth Drive, which is employed as the vehicular access road for visitors and staff alike.
- 1.3.3 The school is accessed by vehicle along Sidmouth Drive via three distinct access points. The Westerly entrance is employed to enter and exit staff parking, whilst the Easterly entrance is employed to access visitor drop-off and parking. The middle access is employed as the exit point for visitor parking, thereby creating a circular movement of traffic through the school during periods of extensive dropping-off and collecting, subsequently improving traffic flow. Pedestrian access is also located on Sidmouth Drive, between the Westerly and middle vehicular access points, leading directly to the school entrance, located on the building's Sidmouth Drive facing façade.

- 1.3.4 There is little development surrounding the site, other than the row of buildings located along West End Road, to the immediate West of the site. There is also an aforementioned row of residential properties located to the East of the school grounds, although they are separated from the site by open green space, containing the Jim O'Neill Walk, and a boundary of hedges.
- 1.3.5 The school site is located within the Green Chain and is within the Built-Up Areas of Greater London designation.
- 1.3.6 The Environment Agency's Flood Map for Planning shows the subject site at Ruislip High School is partially located within an area at risk to flooding; the Western and Southern boundaries are designated as Flood Zone 2, as the Yeading Brook is in proximity, lying to the south of the site. The western side of the site which comprises the car parking area also fall within a Critical Drainage Area as designated in the Local Plan.
- 1.3.7 The site does not lie within any other statutory designations, nor does it lie within a Conservation Area. There are no listed buildings on site nor does the site lie adjacent to any listed buildings or curtilage listed structures.

1.4 Site Planning History

- 1.4.1 A review of the Council's online planning records indicates the following applications of relevance to the proposed scheme:

Reference	Development	Decision
18248/APP/2001/1665	Provision of a 900 place secondary school incorporating adult education facilities, dual use school/community use library, all weather sports pitch and car parking (together with the demolition of cricket pavilion and redundant public conveniences) (outline application)	Approved
18248/APP/2005/1050	Details of floor area, height and footprint of buildings, access, facilities to meet needs of people with disabilities, refuse storage, written	Approved

	specification of planting and cultivation works, access, car parking and highway works, parking areas for people using wheelchairs, cycle storage, indoor sports hall and floodlit all weather playing surface for school/community use and finished levels in compliance with conditions 5, 6, 7, 9,10,12,17,18,19, 27 & 41 of the secretary of state's appeal decision dated 16/12/2003 'provision of a 900 place secondary school, adult education facilities, dual school/community school library, all weather pitch and car parking' (outline application)	
18248/APP/2005/1022	Reserved matters (details of siting, design, external appearance, landscaping and access) in compliance with condition 2 of the secretary of state's appeal decision REF.APP/R5510/A/02/1105352 dated 16/12/2003: provision of a 900 place secondary school, adult education facilities, dual school/ community use library, all weather pitch and car parking (involving the demolition of cricket pavilion and redundant public conveniences)	Approved
18248/APP/2005/1272	Variation of condition 29 (provision of a cricket pitch and drainage improvements at west end recreation ground prior to commencement of development) and conditions 30 and 31 (provision of sports pavilion and two new 10 pitch cricket tables at Bessingby Park recreation ground) of the secretary of state's appeal decision REF.APP/R5510/A/02/1105352 dated 16/12/2003: provision of a 900 place secondary school, adult education facilities, dual school/community use library, all weather pitch and car parking (involving the demolition of cricket pavilion and redundant public conveniences)	Approved
18248/APP/2005/1559	Details of two puffin crossings on Victoria Road and West End Road, improvements to the existing pelican crossing outside new pond parade, west end road, and footway and cycle connections to	Approved

	public roads in compliance with condition 22 of the secretary of state's appeal decision REF. APP/R5510/A/02/1105352 dated 16/12/2003: provision of a 900 place secondary school, adult education facilities, dual school/community use library, all weather pitch and car parking (involving demolition of cricket pavilion and redundant public conveniences) (outline application).	
18248/APP/2005/1676	Details of measures to protect and enhance the ecological and nature conservation interests of the site and neighbouring open spaces in compliance with condition 36 of the secretary of state's appeal decision REF.APP/R5510/A/02/1105352 dated 16/12/2003: provision of a 900 place secondary school, adult education facilities, dual school/community use library, all weather pitch and car parking (involving demolition of cricket pavilion and redundant public conveniences)	Approved
18248/APP/2005/2411	Details of materials ,colours and finishes and boundary fencing in compliance with conditions 2 & 3 of planning permission 18248/APP/2005/1022 dated 24/06/2005 'reserved matters (details of siting, design, external appearance, landscaping and access) in compliance with condition 2 of the secretary of state's appeal decision REF.APP/R5510/A/02/1105352 dated 16/12/2003: provision of a 900 place secondary school, adult education facilities, dual school/ community use library, all weather pitch and car parking (involving the demolition of cricket pavilion and redundant public conveniences)	Approved
18248/APP/2005/2147	Details of compensatory flood storage works in compliance with condition 39 of the secretary of state's appeal decision REF.APP/R5510/A/02/ 1105352 dated 16/12/2003: provision of a 900 place secondary school, adult education facilities, dual school/ community use library, all weather pitch and car parking (involving demolition of	Approved

	cricket pavilion and redundant public conveniences)	
18248/APP/2005/2145	Details of a scheme for the refurbishment and improvement of the children's playground at west end recreation ground in compliance with condition 33 of the secretary of state's appeal decision ref: APP/R5510/A/02/1105352 dated 16/12/2003: provision of a 900 place secondary school, adult education facilities, dual school/community use library, all weather pitch and car parking (involving demolition of cricket pavilion and redundant public conveniences) (outline application)	Approved
18248/APP/2005/2144	Details of floodlighting and other external lighting on site and along associated footways and cycle ways in compliance with condition 8 of the secretary of state's appeal DECISION REF: APP/R5510/A/02/1105352 dated 16/12/2003: provision of a 900 place secondary school, adult education facilities, dual school/community use library, all weather pitch and car parking (involving demolition of cricket pavilion and redundant public conveniences) (outline application)	Approved
18248/APP/2005/2177	Details of measures to improve the drainage of new pond playing fields, a scheme for the disposal of surface water and sewage with surface water control measures in compliance with conditions 32, 38 and 40 of the secretary of state's appeal decision REF.APP/R5510/A/02/1105352 dated 16/12/2003: provision of a 900 place secondary school, adult education facilities, dual school/ community use library, all weather pitch and car parking (involving demolition of cricket pavilion and redundant public conveniences)	Approved
18248/APP/2005/2203	Details of landscaping for the boundaries of new pond playing fields and that part of Sidmouth Drive recreation ground outside the proposed school site in compliance with condition 37 of the secretary of state's appeal decision REF:	Approved

	APP/R5510/A/02/1105352 dated 16/12/2003 :provision of a 900 place secondary school, adult education facilities, dual school/community use library, all weather pitch and car parking (involving demolition of cricket pavilion and redundant public conveniences) (outline application)	
18248/APP/2005/2366	Variation of condition 22 of the secretary of state's appeal decision REF.APP/R5510/A/02/1105352 dated 16/12/2003: provision of a 900-place secondary school, adult education facilities, dual school/community use library, all weather pitch and car parking (together with the demolition of cricket pavilion and redundant public conveniences) to allow for the replacement of proposed toucan crossings with puffin crossings	Approved
18248/APP/2005/2380	Details of protective fencing in compliance with condition 15 of the secretary of state appeal decision REF:APP/R5510/A/02/1105352, dated 16/12/2003 (provision of a 900 place secondary school incorporating adult education facilities, dual use school/community use library, all weather sports pitch and car parking (together with the demolition of cricket pavilion and redundant public conveniences) (outline application))	Approved
18248/APP/2006/74	Details of new boundary fencing between the open space to the south of school and the neighbouring London Underground in compliance with condition 43 secretary of state appeal decision REF:APP/R5510/A/02/1105352, dated 16/12/2003 (provision of a 900 place secondary school incorporating adult education facilities, dual use school/community use library, all weather sports pitch and car parking (together with the demolition of cricket pavilion and redundant public conveniences) (outline application)	Refused
18248/APP/2006/2974	Details of a site survey plan in compliance with condition 13 of the secretary of state appeal	Approved

	decision REF:APP/R5510/A/02/1105352, dated 16/12/2003 (provision of a 900 place secondary school incorporating adult education facilities, dual use school/community use library, all weather sports pitch and car parking (together with the demolition of cricket pavilion and redundant public conveniences)(outline application))	
18248/APP/2006/2498	Details of a travel plan in compliance with condition 20 of the secretary of state's appeal decision REF.APP/R5510/ A/02/1105352 dated 16/12/2003: provision of a 900 place secondary school, adult education facilities, dual school/ community use library, all weather pitch and car parking (involving the demolition of cricket pavilion and redundant public conveniences)	Approved
64322/APP/2008/954	Extension of existing frontage fencing to include additional swing gates and fence panels and raising of height of rear fencing including attachment of mesh fencing for security purposes.	Approved
18248/APP/2011/686	Erection of a dining room extension, new canopy to rear elevation, four new class rooms in roof void, together with associated internal and external alterations; Relaxation of Condition 5 of Secretary of State's Appeal decision REF.APP/R5510/A/02/1105352 dated 16/12/2003 to allow the additional floorspace.	Approved
18248/APP/2011/2173	Details in compliance with conditions 4 (proposed canopy) and 6 (construction management plan) of planning permission REF. 18248/APP/2011/686 dated 28/04/11: Erection of a dining room extension, new canopy to rear elevation, four new class rooms in roof void, together with associated internal and external alterations; Relaxation of Condition 5 of Secretary of State's Appeal decision REF.APP/R5510/A/02/1105352 dated 16/12/2003 to allow the additional floorspace.	Approved

Table 1: Planning History

2 Development Proposals

- 2.1 The proposal seeks to enhance and enlarge the existing facilities at Ruislip High School and proposes to accommodate additional classroom space.
- 2.2 As detailed in the Design and Access Statement, the new school development proposed as part of this planning application comprises the following elements:
- A new three-storey building, located to the East of the existing school building and connecting to the two existing sloped wings.
 - An additional block added to the existing school building's changing facilities.
 - Provision of Special Resource Provision Units to assist with the education of physically disabled students and students suffering from autism.
 - Additional classrooms.
 - Additional study space.
 - Additional student social space.
 - Additional faculty rooms.
 - Additional restroom facilities.
 - Provision of an additional dining/exhibition room.
 - Provision of a covered external play deck and art studio.
 - Provision of an external plant room.
 - Additional changing rooms.
 - Additional storage.
 - Two three-story staircases connecting the proposed and existing buildings, Reorganising the existing connectivity and improving accessibility and student circulation.

3 Planning Policy

3.1 Planning Policy Framework

- 3.1.1 Under Section 38(6) of the Planning & Compulsory Purchase Act 2004 the determination of development proposals should be made in accordance with the relevant policy provisions of the statutory Development Plan unless material considerations indicate otherwise.
- 3.1.2 The Development Plan in force as it relates to this proposal comprises the Hillingdon Local Plan Part 1 – Strategic Policies 2012 and the saved policies of the Unitary Development Plan (UDP) 2007. The London Plan 2016 also makes up part of the development plan for the area.
- 3.1.3 Other material planning policy considerations include the National Planning Policy Framework 2012 (NPPF) and Ministerial or Government Policy Statements and any Supplementary Planning Guidance. The Council adopted the Hillingdon Design and Accessibility Statement SPD in 2013 and also has a Noise SPD adopted in 2006 and a Land Contamination SPG adopted in 2014.

3.2 Planning Policy Designations

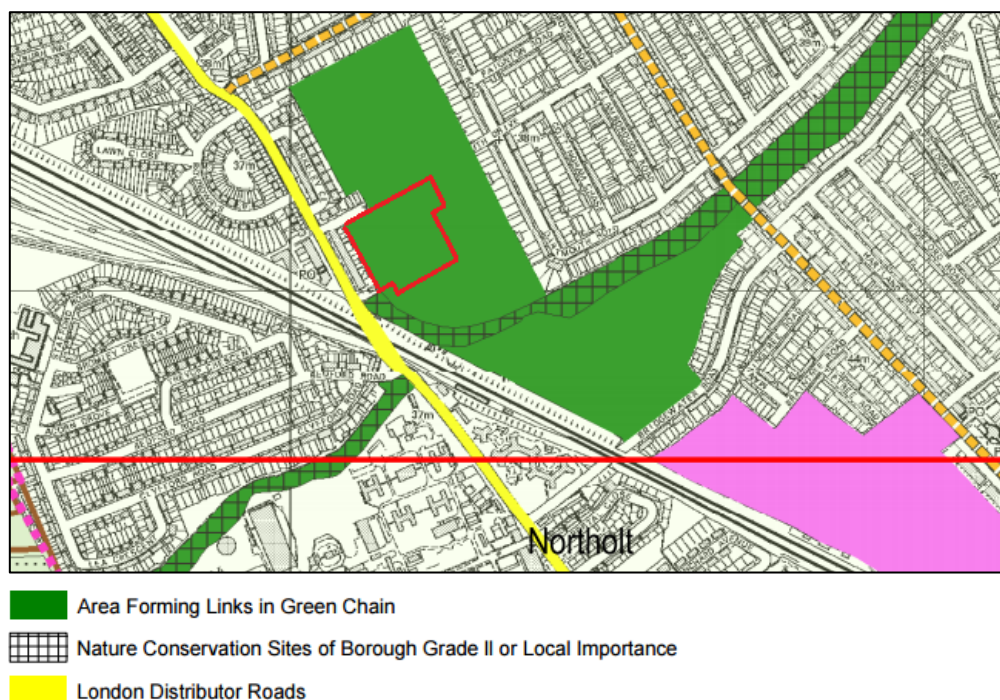


Fig 1. Extract from the UDP Proposals Map 2007

- 3.2.1 The red outline of the site has been added to highlight the area, and is not part of the UDP Proposals Map.
- 3.2.2 The UDP Proposals Map (Fig.1) shows that the school site falls within the Green Chain and is also adjacent to a designated Nature Conservation Site of Borough Importance along the Yeading Brook. The site is also located in close proximity to the London Distributor Road, West End Road (A4180).

3.3 Development Plan Policy

LBH Local Plan: Part 1 -Strategic Policies 2012

- 3.3.1 The following Table 2 sets out the relevant policies of the LBH Local Plan Part 1 - Strategic Policies:

Policy	Description
Policy BE1: Built Environment	The Council will require all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, where people enjoy living and working and that serve the long-term needs of all residents.
Policy BE38: Landscaping	The Council will expect to see landscape features of merit retained in development proposals wherever appropriate. Tree Surveys should be submitted where proposals for development would affect existing trees.
Policy EM1: Climate Change Adaptation and Mitigation	The Council will ensure that climate change mitigation and adaptation is addressed at every stage of the development process through a number of actions.
Policy EM2: Green Belt, Metropolitan Open Land and Green Chains	The Council will seek to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains.
Policy EM4: Open Space and Informal Recreation	The Council will safeguard, enhance and extend the network of open spaces, informal recreational and environmental opportunities that operate as carbon sinks and that meet local community needs and facilitate active lifestyles by providing spaces within walking distance of homes. Provision should be made as close as possible to the community it will serve. There will be a presumption against any net loss of open space in the Borough.

Policy EM6: Flood Risk Management	The Council will require new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the National Planning Policy Framework (NPPF).
Policy EM7: Biodiversity and Geological Conservation	The Council will review all the Borough Grade Sites of Importance for Nature Conservation (SINCs). Deletions, amendments and new designations will be made where appropriate within the Hillingdon Local Plan: Part 2- Site Specific Allocations Local Development Document. These designations will be based on previous recommendations made in discussions with the Greater London Authority.
Policy EM8: Land, Water, Air and Noise	The Council will seek to safeguard and improve all water quality, both ground and surface. Principal Aquifers, and Source Protection Zones will be given priority. All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. The Council will investigate target areas identified in the Defra Noise Action Plans, promote the maximum possible reduction in noise levels and will minimise the number of people potentially affected.
Policy T1: Accessible Local Destinations	The Council will steer development to the most appropriate locations in order to reduce their impact on the transport network. All development should encourage access by sustainable modes and include good cycling and walking provision.
Policy CI1: Community Infrastructure Provision	The Council will ensure that community and social infrastructure is provided in Hillingdon to cater for the needs of the existing community and future populations by: Supporting extensions to existing schools and the development of new schools and youth facilities (+ Others)
Policy CI2: Leisure and Recreation	The Council will, in partnership with other bodies, seek to secure good quality, well maintained leisure and recreation facilities to address identified deficiencies and meet the needs of local communities, particularly deprived groups.

Table 2. Strategic Policies

LBH – Unitary Development Plan (Saved Policies) 2007

3.3.2 The following Table 3 sets out the relevant saved policies of the UDP 2007

Policy	Description
OL11: Green Chain	The Yeading Valley Park Corridor, open land adjoining Ickenham and Ruislip, and narrow strips of open land such as the River Pinn Corridor and the Grand Union Canal, all link together to form 'Green Chains' of open land which extend across the Borough boundaries, providing wildlife corridors and countryside leisure opportunities for the urban dweller. The local planning authority will look to:- (i) encourage the provision and improvement of suitable recreational facilities; (ii) maintain their positive contribution in providing a visual and physical break in the built-up area; (iii) conserve and enhance the visual amenity and nature conservation value of the landscape; (iv) seek to improve public access to and through the area; and (v) promote an overall identity for Green Chains throughout the borough.
OL26: Trees and Woodland	The local planning authority will protect trees and woodlands and encourage the preservation, proper management and in appropriate locations the extension of woodlands. Proposals for development in the more rural areas of the borough should be accompanied by proposals for landscaping and tree planting wherever practicable, and the retention of existing landscaping features where appropriate.
EC2: Nature Conservation	The local planning authority will promote nature conservation as a positive land use and will take nature conservation interests into account in considering proposals for development of land especially within sites of borough (grade ii) and local importance, as defined by the London ecology unit. The protection of species afforded by the wildlife and countryside act 1981 (amended 1985) will be a material consideration. Where appropriate the local planning authority may ask applicants to submit an ecological assessment before it determines development proposals.

EC3: SNCI	The local planning authority will require proposals for development in the vicinity of sites of nature conservation importance to have regard to the potential effects on such sites of changes in the water table and of air, water, soil and other effects which may arise from the development.
EC5: Ecological Protection and Enhancement	In determining planning applications, the local planning authority may require certain on-site ecological features to be retained in new developments and seek to enhance the nature conservation and ecological interest of sites or create new habitats through the use of planning conditions attached to planning permissions or through planning agreements negotiated with developers.
BE13: Layout and Appearance	Development will not be permitted if the layout and appearance fail to harmonise with the existing street scene or other features of the area which the local planning authority considers it desirable to retain or enhance.
BE15: Alterations/Extensions to Existing Buildings	Proposals for alterations and extensions to existing buildings will be permitted where they harmonise with the scale, form, architectural composition and proportions of the original building.
BE19: Protecting and Enhancing Amenity in Residential Areas	The local planning authority will seek to ensure that new development within residential areas complements or improves the amenity and character of the area
BE21: Residential Amenity	Planning permission will not be granted for new buildings or extensions which by reason of their siting, bulk and proximity, would result in a significant loss of residential amenity.
BE38: Retention of Topographical and Landscape Features	Development proposals will be expected to retain and utilise topographical and landscape features of merit and provide new planting and landscaping wherever it is appropriate. Planning applicants for planning consent will be required to provide an accurate tree survey showing the location, height, spread and species of all trees where their proposals would affect any existing trees.
OE1: Protection of Character	Planning permission will not normally be granted for uses and associated structures which are, or are likely to become, detrimental to the character or amenities of surrounding properties or the area generally.
OE3: Noise	Buildings or uses which have the potential to cause noise annoyance will only be permitted if the impact is mitigated within acceptable levels by engineering, lay-out or administrative measures.

OE5: Siting of Noise-Sensitive Developments	Proposals for the siting of noise sensitive developments such as family housing, schools or certain forms of commercial activity where the occupiers may suffer from noise or vibration will not be permitted in areas which are, or are expected to become, subject to unacceptable levels of noise or vibration. Where development is acceptable in principle, it will still be necessary to establish that the proposed building or use can be sited, designed, insulated or otherwise protected from external noise or vibration sources to appropriate national and local standards. Account will be taken of any changes likely to occur in noise levels within a 10-15 year period following the date of submission of any application for planning permission.
OE7: Development in Areas Likely to Flooding	In the areas liable to flooding permission will not be granted for new development or the intensification of existing development unless a developer is prepared to implement flood protection measures as part of the proposed development to a standard satisfactory to the council, in consultation with the environment agency and where appropriate, other drainage bodies.
OE8: Flood Risk Due to Additional Surface Water Run-Off	Planning permission will not be granted for new development or redevelopment of existing urban areas which would result in an increased flood risk due to additional surface water run-off, unless the proposed development includes appropriate attenuation measures to a standard satisfactory to the council, in consultation with the environment agency and, where appropriate, other drainage bodies.
R5: Loss of Sports Facilities	The LPA will not grant planning permission for proposals which involve the loss of land or buildings used (or where the last authorised use was for) a sports stadium, outdoor or indoor sports and leisure facilities, public or community meeting halls, or religious, cultural and entertainments activities, unless adequate, accessible, alternative facilities are available.
R10: Buildings for Education	Policy R10 specifically supports the development of buildings for education as being acceptable in principle subject to meeting other policies of the plan.
AM2: Traffic Generation	Development proposals will be assessed against their impact on congestion and public transport availability and capacity to meet increased demand.
AM7: Traffic Generation	Traffic generated by proposed developments will be carefully assessed and the LPA will not grant planning permission for

	development which would unacceptably increase demand along roads or through junctions which are already used to capacity or that would prejudice the free flow of traffic or highway/pedestrian safety.
AM14: Car Parking	New development will only be permitted where it is in accordance with the council's adopted car parking standards, as set out in Annex 1. This states that parking provision for secondary schools will be assessed on an individual basis, as informed by a Transport Assessment and Travel Plan.

Table 3. Saved UDP policies

London Plan 2016 Including Jan 2017 Update

3.3.3 The following Table 4 sets out the relevant policies of the London Plan 2016/2017:

Policy	Description
Policy 2.6 Outer London: Vision and strategy	The Mayor will, and boroughs and other stakeholders should, enhance the quality of life in outer London for present and future residents as one of its key contributions to London as a whole. The significant differences in the nature and quality of outer London's neighbourhoods must be recognised and improvement initiatives should address these sensitively in light of local circumstances, drawing on strategic support where necessary.
Policy 3.6 Informal Recreation Facilities	The Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible.
Policy 3.18 Education Facilities	Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to educational purposes. Those which address the current and projected shortage of primary school places and the projected shortage of secondary school places will be particularly encouraged. Proposals which result in the net loss of education facilities should be resisted, unless it can be demonstrated that there is no ongoing or future demand
Policy 3.19 Sports Facilities	Development proposals that increase or enhance the provision of sports and recreation facilities will be supported.
Policy 5.2 Minimising carbon dioxide emissions	Development proposals should make the fullest contribution to minimising carbon dioxide emissions

Policy 5.3 Sustainable Design and Construction	Development proposals should demonstrate that sustainable design standards are integral to the proposal, including its construction and operation, and ensure that they are considered at the beginning of the design process.
Policy 5.12 Flood Risk Management	Development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk 1 over the lifetime of the development and have regard to measures proposed in Thames Estuary 2100 (TE2100 – see paragraph 5.55) and Catchment Flood Management Plans.
Policy 5.13 Sustainable Drainage	Recommends the use of SuDS to reduce surface water run-off.
Policy 6.3 Effects of development on transport capacity	Development proposals should ensure that impacts on transport capacity and the transport network, at both a corridor and local level, are fully assessed. Development should not adversely affect safety on the transport network.
Policy 7.1 Lifetime Neighbourhoods	In their neighbourhoods, people should have a good quality environment in an active and supportive local community based on the lifetime neighbourhoods principles.
Policy 7.2 Inclusive Environment	The Mayor will require all new development in London to achieve the highest standards of accessible and inclusive design and supports the principles of inclusive design.
Policy 7.4 Local Character	Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.
Policy 7.15 Noise	Development proposals should seek to manage noise by avoiding significant adverse noise impacts on health and quality of life as a result of new development.
Policy 7.21 Trees and Woodlands	Existing trees of value should be retained and any loss as the result of development should be replaced following the principle of 'right place, right tree' ¹ . Wherever appropriate, the planting of additional trees should be included in new developments, particularly large-canopied species.

Table 4: London Plan Policies.

3.4 Other Material Planning Policy Considerations

The National Planning Policy Framework (2012)

- 3.4.1 The NPPF was published by Central Government in March 2012 and consolidates all of the former Planning Policy Guidance/Statements into one document. Importantly the document sets out the “presumption in favour of sustainable development” which the Government considers should be applied to all development proposals to facilitate future sustainable growth. More specifically to this proposal, the document states the following under each relevant topic headings:

Sustainable Transport

- 3.4.2 Paragraph 32 states that all developments which generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment. Planning decisions should take into account the following: Whether opportunities for sustainable transport modes have been taken up depending on the nature and location of the site, to reduce the need for major transport infrastructure;
- Whether safe and suitable access to the site can be achieved for all people; and
 - Whether improvements can be undertaken within the transport network that cost effectively limit the significant impacts of the development. Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.
- 3.4.3 Paragraph 35 states that developments should be located and designed where practical to
- accommodate the efficient delivery of goods and supplies;
 - give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;
 - create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;

- incorporate facilities for charging plug-in and other ultra-low emission vehicles; and
- consider the needs of people with disabilities by all modes of transport.

3.4.4 Paragraph 36 recognises that the key tool in achieving the above strategy is the completion of monitoring and management of a Travel Plan. All developments which generate significant amounts of movement should be required to provide a Travel Plan.

Design

3.4.5 Paragraph 75 reinforces the importance of planning positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

3.4.6 Paragraph 58 states that planning decisions should aim to ensure that developments display the following characteristics:

- function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit;
- optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks;
- respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation;
- create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion; and
- are visually attractive as a result of good architecture and appropriate landscaping.

3.4.7 Paragraph 59 clearly states that planning decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles.

3.4.8 Paragraph 61 recognises that although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning decisions should address the connections between people and places and the integration of new development into the natural, built and historic environment.

Community Use

3.4.9 Paragraph 70 requires local authorities to seek to plan positively for the provision and use of shared space, community facilities and other local services to enhance the sustainability of communities and residential environments.

Education

3.4.10 At paragraph 72 the NPPF confirms that the Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities.

3.4.11 Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education. They should give great weight to the need to create, expand or alter schools and work with schools promoters to identify and resolve key planning issues before applications are submitted.

Open Space and Sports Facilities

3.4.12 Paragraph 74 states that existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless:

- an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or
- the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or

- the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss

Sustainability

3.4.13 Paragraph 96 requires new development to comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable. Development proposals should take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

Flood Risk

3.4.14 Paragraph 99 confirms that new development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures.

3.4.15 Paragraph 100 requires inappropriate development in areas at risk of flooding to be avoided by directing development away from areas at highest risk, but where development is necessary, to make it safe without increasing flood risk elsewhere.

3.4.16 In order to successfully achieve this, the NPPF continues the previous advice of PPS25 to apply a sequential assessment of site location

Biodiversity

3.4.17 At paragraph 118, the NPPF places specific responsibility on Local Planning Authorities to conserve and enhance biodiversity when determining planning applications by applying the following principles relevant to the application scheme:

- if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;

- proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted.
- opportunities to incorporate biodiversity in and around developments should be encouraged;
- planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss;

3.4.18 Paragraph 119 specifically confirms that the presumption in favour of sustainable development (paragraph 14) does not apply where development requiring appropriate assessment under the Birds or Habitats Directives is being considered, planned or determined.

Pollution and Contamination

3.4.19 Paragraph 121 states that planning decisions should also ensure that the application site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation

3.4.20 After remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990 and adequate site investigation information, prepared by a competent person, should be presented

Noise

3.4.21 Paragraph 123 states that planning decisions should aim to:

- avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;

- mitigate and reduce to a minimum other adverse impacts on health and quality of life arising from noise from new development, including through the use of conditions

External Lighting

3.4.22 Paragraph 125 confirms that by encouraging good design, planning decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.

Planning for Schools Development Policy Statement - August 2011

3.4.23 In addition, the Government has further pledged its support for the development of schools by producing the Planning for Schools Development Policy Statement. The Policy Statement says that the creation and development of state-funded schools is strongly in the national interest and that planning decision-makers can and should support that objective, in a manner consistent with their statutory obligations.

3.4.24 The Statement outlines the Government's belief that the planning system should operate in a positive manner to schools. The Statement requires Local Authorities to apply a presumption in favour of the development of state-funded schools. It goes on to say: *'We expect all parties to work together proactively from an early stage to help plan for state-school development and to shape strong planning applications. This collaborative working would help to ensure that the answer to proposals for the development of state-funded schools should be, wherever possible, "yes". The Government believes that the planning system should operate in a positive manner when dealing with proposals for the creation, expansion and alteration of state-funded schools, and that the following principles should apply with immediate effect.'*

3.4.25 There should be a presumption in favour of the development of state-funded schools, as expressed in the National Planning Policy Framework.

Local authorities should give full and thorough consideration to the importance of enabling the development of state-funded schools in their planning decisions.

The Secretary of State will attach significant weight to the need to establish and develop state-funded schools when determining applications and appeals that come before him for decision.

Local authorities should make full use of their planning powers to support state funded schools applications.

This should include engaging in pre-application discussions with promoters to foster a collaborative approach to applications and, where necessary, the use of planning obligations to help to mitigate adverse impacts and help deliver development that has a positive impact on the community.

Local authorities should only impose conditions that clearly and demonstrably meet the tests set out in Circular 11/95.

Planning conditions should only be those absolutely necessary to making the development acceptable in planning terms.

Local authorities should ensure that the process for submitting and determining state-funded schools' applications is as streamlined as possible, and in particular be proportionate in the information sought from applicants.

A refusal of any application for a state-funded school, or the imposition of conditions, will have to be clearly justified by the local planning authority.

Given the strong policy support for improving state education, the Secretary of State will be minded to consider such a refusal or imposition of conditions to be unreasonable conduct, unless it is supported by clear and cogent evidence.

Appeals against any refusals of planning permission for state-funded schools should be treated as a priority.

Where permission is refused and an appeal made, the Secretary of State will prioritise the resolution of such appeals as a matter of urgency in line with the priority the Government places on state education.

Where a local planning authority refuses planning permission for a state-funded school, the Secretary of State will consider carefully whether to recover for his own determination appeals against the refusal of planning permission.

This statement applies to both change of use development and operational development necessary to the operational needs of the school.' (the emphasis in bold is as per the statement).

3.4.26 In short, the Government's planning policy for schools, which is a material planning consideration of weight, place great emphasis on positive engagement and streamlined planning decisions from planning authorities for developments of the type presented in this planning application.

3.4.27 Applicants are to play an equally proactive part in this process in order not unnecessarily to delay the delivery of new school facilities.

LBH Design and Accessibility Statement SPD 2013 – (Accessible Hillingdon)

3.4.28 This document establishes the Borough's standards and requirements with regard to a development's accessibility for all demographics. The document sets out general requirements for a development's streetscape, ramp, stairs, building entrance, fire escape and parking design for it to be considered acceptable and inclusive of all people.

3.4.29 The document also sets out more specific design requirements regarding schools. Schools must:

- provide a level or gently sloping approach and step free access into all buildings via a common entrance;
- promote barrier-free movement to and around all areas, including all classrooms, lecture theatres, refectory and student accommodation;
- allow students to participate inclusively through assistive technology and built-in flexibility to support those with diverse access needs, e.g. height adjustable work-benches, hearing enhancement systems;
- a building is designed to encourage social interaction of all, including areas such as, refreshments, and quiet study places and recreational opportunities;
- provide soundproof study areas e.g. in the library, to allow people with a visual impairment to work with an assistant reading aloud

3.4.30 The document also explains what a development should include within its (design and) access statement. Access statements must explain the philosophy behind their inclusive design, explain why they have deviated from the standard framework of high-quality, inclusive design (if they have deviated), give details regarding the development's required management and maintenance in order to maintain its inclusive nature and address accessibility issues concerning pre-existing buildings (in the case of extensions and listed buildings).

LBH Noise SPD 2006

3.4.31 This document provides advice regarding the issues the LPA will take into account when considering a development's noise impact and how developments can deal with those issues. LBH look to mitigate noise concerns through the use of land use planning controls. The LPA accepts noise mitigation at the source (technological noise reduction or noise insulation measures), at a distance (noise barriers) or by controls over the noise generating operations (such as limited hours).

3.4.32 Schools are considered to be noise-sensitive development, and noise must therefore be carefully considered: 60 LAeq,T dB should be regarded as a desirable upper limit for major new schools.

3.4.33 Acceptable school internal noise levels:

- Lecture theatre 30 - 35
- Classroom 35 - 40
- Library 40 - 50
- Outdoor Playground <55

LBH Land Contamination SPG 2014

3.4.34 This document sets out the necessary steps to be undertaken to deal with land contamination risks. Part IIA of the Environmental Protection Act 1990 requires Local Authorities to identify contaminated land and bring about its remediation.

3.4.35 LBH Contaminated Land Inspection Strategy has targeted voluntary remediation of contaminated land through the planning process: conditions will be used to ensure developed land will no longer qualify as contaminated land.

3.4.36 It is stated that previously developed land will almost always require an assessment. A contaminated land assessment should be submitted as part of a planning application and is divided into 4 stages:

Stage 1 – The Desktop study

Stage 2 – The Detailed Site Investigation and Risk Assessment

Stage 3 – The Remediation Strategy

Stage 4 – The Validation of Remedial Works

3.4.37 The number of stages a contamination report will go through depends on the findings at each stage.

3.4.38 Conditions will be used to ensure that development:

- does not present or incur unacceptable risk to human beings, or any ecological system, or living organism, forming part of such system, or any property including buildings, or any unexpected financial risks, in ways that impact on land use (e.g. high risks to occupiers from high levels of garden contamination or vapours from the ground, building deterioration through chemicals in the ground, potential for explosive gases);
- does not create new pollution linkages affecting other receptors, for example by mobilising contaminants or changing exposure pathways, particularly where the receptors form an intrinsic part of the development (e.g. creating gardens and landscaped areas without full remediation measures, or forming a water pollution pathway through badly designed drainage);
- does not lead to unacceptable concentrations of contaminants being left in place, or pollution pathways being left open (e.g. by not properly capping the site or closing gas or vapour pathways);

- does not prejudice or impede necessary remediation for other contamination problems that may not otherwise impact on 'land use' (e.g. by creating groundwater pollution problems); and
- can be carried out safely, without the creation of risks to workers or neighbours.

LBH Air Quality SPG 2002

- 3.4.39 The LBH Air Quality SPG sets out the circumstances when an Air Quality Assessment is required and provides guidance in relation to the process of undertaking Air Quality Assessments.
- 3.4.40 An Air Quality Assessment is required for a variety of developments in or adjacent to an Air Quality Management Area. Developments which will result in an increase in vehicle trip generation, notably an increase in traffic volumes of 5% or more on individual road links with more than 10,000 vehicles per day, will be required to submit an air quality assessment. Air Quality Assessments must demonstrate how a development would affect pollution levels relevant to the statutory air quality objectives
- 3.4.41 Air Quality Assessments must account for the scale of the emissions, level of public exposure, ground level concentrations and the development's adherence to the Council's air quality objectives. The development's acceptability will depend upon these elements.
- 3.4.42 The Air Quality Assessment must also include details regarding the mitigation of its impacts, which will determine the development's viability in relation to air quality.

LBH Community Safety SPG 2004

- 3.4.43 The Community Safety SPG establishes a framework for improvements to the public realm which development must adhere to, in order to create and maintain a safe and secure environment for those who interact with the Borough.
- 3.4.44 The overarching principles of good design, that the SPG considers paramount in regards to new development, are:

- Access and movement: places with well-defined routes, spaces and entrances that provide for convenient movement without compromising security.
- Structure: places that are structured so that different uses do not cause conflict.
- Surveillance: places where all publicly accessible places are overlooked.
- Ownership: places that promote a sense of ownership, respect, territorial responsibility and community.
- Physical protection: places that include necessary, well-designed security features.
- Activity: places where the level of human activity is appropriate to the location and creates a reduced risk of crime and a sense of safety at all times.
- Management and maintenance: places that are designed with management and maintenance in mind, to discourage crime in the present and the future.
- a high quality and well thought out design and layout, with a good lighting, CCTV, (where appropriate), clearly defined boundaries, secure buildings and surroundings and a balance between natural surveillance and privacy.
- Building effective partnerships between the Council, police and the local community.

LBH Planning Obligations SPD 2014

3.4.45 This Supplementary Planning Document (SPD) provides guidance on the use of planning obligations in the Borough for all those involved in the submission and determination of planning applications

3.4.46 The Planning Obligations SPD sets out a number of requirements for development:

- All school developments must include a standard travel plan as part of their planning application. Travel Plans should illustrate that the development makes provisions to encourage cycling and walking, as well as including measure that produce quantifiable emission benefits.

- Development in or adjacent to the Air Quality Management Area may obligations regarding its acceptability from an air quality perspective, notably the scale of emissions, impact on the Borough, public exposure and ground level concentrations.
- Planning obligations may also be sought in relation to noise, as is set out by the Council's Noise SPD, where a development would experience exceedances of internal noise criteria for schools.
- Planning obligations regarding training and employment will be sought for development generating at least 50 full-time equivalent jobs. Developments may be required to submit an employment strategy as part of the application, provide a financial contribution to a training course for under-skilled or unemployed locals, local employment brokerage, and/or initiatives providing or contribution to training, employment and recruitment related services and projects.
- Community safety planning obligations will also be imposed if a development is considered to raise issues regarding community safety in the public realm. These obligations can include crime prevention and safety measures, such as CCTV, signage, car parking improvements and highway works.
- Planning obligations regarding environmental impacts will be sought if a development is likely to have adverse impacts on biodiversity and nature conservation, landscape and trees, recycling and waste management, land contamination and flooding.
- Planning obligations may equally be required for development relating to open space provision. These obligations will be imposed on developments which are judged to cause the loss of recreational open space or present deficiencies in open space or recreational facilities. The Council's CIL will also be used to provide sports and leisure facilities for the borough.

4 Development Appraisal and Planning Policy Compliance

4.1 Principle of Development

- 4.1.1 The application area is currently used as a school comprising the building and grounds of the existing Ruislip High School campus.
- 4.1.2 Increasing the existing school's building will enable the school to fully accommodate pupils to a capacity of 1302 whilst continuing to realise its aspirations within which all pupils can thrive. The new development will also assist in the provision of education for all children, with the addition of two Special Resource Provision Units, which will assist in the education of students with autism and physical disabilities. The development will also assist in providing an element of additional recreational space for the school, with the addition of the rooftop play deck.
- 4.1.3 The site is not the subject of any specific planning policies surrounding the principle of its development, but it is identified as a link in the Green Chain, where the principle of development is controlled. The existing school building will be retained without significant refurbishment, and where the new build element is created, it would be designed to continue the existing three-storey form of the adjacent main building. The proposed building would be sited on the existing grass ancillary space and footpath to the pitch area, adjacent to the school building, and would therefore be sited on partially developed land, and on the least significant available land. The overall design would therefore aim to achieve the maximum benefit in terms of education and sporting facilities whilst presenting the least impact in terms visual and physical presence.
- 4.1.4 The application proposed will significantly improve the educational and recreational facilities at the school, which will benefit the existing pupils and staff. In this context, the small incursion into the school's grass space that would arise from the proposal would be offset by the introduction of a recreational deck and external plant room on the proposed building's top floor, thereby replacing the lost grass space with an equivalent quantity of high-quality recreational space.

- 4.1.5 The provision of new development for schools is specifically supported in the NPPF and the Government has pledged further support for school development in their DCLG Policy Statement - Planning for School Development.
- 4.1.6 Against this background of strong policy support, it is therefore considered that the principle of redeveloping the site to provide a new school building with improved recreational facilities is acceptable, and complies with the strategic aims for creation of state funded schools, as set out in the NPPF and the Ministerial Statement. The principle of the proposal is also supported by Saved UDP Policy R10, as well as London Plan Policy 3.18, which both seek to ensure that adequate provision is made for secondary school places and that any projected shortage is addressed.

4.2 Impact upon designated Green Chain

- 4.2.1 The school site is shown as falling within an area designated as “Green Chain” on the Local Plan Proposals Map. Paragraph 8.22 of the Local Plan Part 1 – Strategic Policies states that Green Chains are *“the green links between sites, both for recreation and wildlife, include public footpaths, bridleways, canals, rivers, streams and tree lined streets and road verges, all of which contribute to the green network within the borough”*. One of the key aspects of the Green Chain areas is the diversity of habitats they support which link man-made corridors enabling flora and fauna to migrate into the centre of London.
- 4.2.2 Policy EM2 of the Local Plan Part 1 Strategic Policies sets a presumption against development unless they maintain the positive contribution of the Green Chain in providing a visual and physical break in the built-up area; conserve and enhance the visual amenity and nature conservation value of the landscape; encourage appropriate public access and recreational facilities where they are compatible with the conservation value of the area, and retain the openness of the Green Chain. The objectives of policy EM2 largely reflect the requirements of previous Policy OL11 of the UDP saved policies relating to Green Chains.

- 4.2.3 In this instance the school site is already largely developed and the area proposed for the extension to the existing building is used intensively as informal social space by the school. It comprises a level grassed area with hard surfaced walkways that are for sole use by the school. The land therefore makes very little positive contribution to the nature conservation aims and objective for designating land within the Green Chain given its very low ecological value.
- 4.2.4 In terms of visual and physical encroachment into the openness of the Green Chain, the extension to the existing building is entirely contained within the existing envelope of the school development. Views of the building are restricted and the potential for adversely affecting the spatial break up of existing urban areas is limited.
- 4.2.5 The extension to Ruislip High School would be viewed against the existing school campus and would have little impact upon openness in this area. The positive aspects of the Green Chain area would not be prejudiced by the proposal which is considered to represent development that can be supported under Policy EM2 and Policy OL11.
- 4.2.6 It is considered relevant to note that the emerging Local Plan Part 2 – Site Allocations and Designations Submission Version 2015 proposes to remove the whole of the Ruislip high school site from the Green Chain designation as it no longer performs some of the key aspects of including land within the designation namely – it is not considered to be land that is recognised as having potential for open land recreational use or land of actual or potential landscape value. Whilst the Local Plan part 2 has yet to be formally adopted it is at a fairly advanced stage with imminent submission expected to the Secretary of State for Communities and Local Government. Greater weight can be given to this document given its more advanced stage and it demonstrates the Council's current thinking with regard to the relatively low contribution this site makes to the Green Chain.

4.3 Open Space Assessment and Sports Provision

- 4.3.1 Policy EM4 and EM5 of the Strategic Policies seeks to safeguard, enhance and extend the network of open spaces and sport and leisure facilities across the

borough to meet the needs of the community and to facilitate active lifestyles. The proposed new school development responds positively to this policy requirement retaining all of the open sports pitches that are currently provided on site.

4.3.2 Saved Policy R5 of the UDP states that planning permission will not be granted for proposals which would involve the loss land for (amongst others) outdoor sporting facilities unless adequate, alternative accessible facilities are available. As a constrained site, the proposed school extension necessarily is located on land that currently forms part of the schools informal grassed social area. This part of the school site is not used for sport or as sports pitches and is not of a size or configuration suitable for doing so. There is therefore no question that playing pitches would be lost or affected as part of the proposal in line with Sport England's overriding direction.

4.3.3 The site upon which the extension will be located forms part of the overall envelope of development for school and does not form a publicly accessible area of open space. There would therefore be no conflict with the aims and objective of Strategic Policy EM4 which sets a presumption against the loss of open space in the Borough.

4.4 General Design Principles

4.4.1 The DAS explains and illustrates the design principles and concept for the new school development and details how the design is appropriate to the site and fits with its surroundings. The section confirms how the design for the new school development has evolved and reflects the former CABE guidelines for a well-designed school, which are considered useful in making assessment of the success of a new school development. In brief, the proposed extension to the school meets these in the following ways:

- Presents a high-quality design that inspires users to learn.
- Takes a sustainable approach to design, construction and environmental servicing.

- Creates buildings and grounds that are welcoming to both the school and the community while providing adequate security.
- Presents good organisation of spaces in plan and section that is easily legible and fully accessible.
- Provides internal spaces that are well proportioned, fit for purpose and meet the needs of the curriculum.
- Introduces a flexibility of design which allows for short term changes of layout and use and for long term expansion and contraction.
- Ensures good environmental conditions throughout including optimum level of natural light and ventilation for different activities within the buildings.
- Proposes well-designed external spaces offering a variety of different settings for recreational purposes.
- Introduces a simple palette of attractive materials, detailed carefully to be durable and easily maintained and to age gracefully.

4.4.2 The overall design strategy for the new school development seeks to improve the appearance and operation of the school, providing a flexible and functional space to learn which provides for the needs of all users whilst creating an innovative and inspiring environment. The proposal expressly reflects the aims and aspirations of the London Plan at Policy 7.1 which seeks high quality environments that support local communities and seek to promote lifetime neighbourhoods.

4.4.3 With regard to the objectives set out in Policy BE1 of the Strategic Policies, saved UDP policies BE13, BE15, BE19, BE21 and OE1 and Policy 7.4 of the London Plan, and the design requirements of the LBH Design and Accessibility SPD 2013 the proposal accords in the following ways:

Residential Amenity and Environmental Impacts: The school site is located in an area that is adjacent to existing residential development, along the rear of West End Road, and is surrounded by extensive residential development on the other side of the neighbouring sports fields located to the East and North.

Residential amenity protection has therefore been a key driver in the formulation of the design for the new development. The key elements of the scheme that could affect the living conditions of the school's neighbours are considered to be siting of development, associated traffic generation, noise, lighting and security.

The existing dwellings on West End Road are facing Ruislip High School; there is, however, an existing physical barrier of hedges and trees, and the school is therefore well protected from views. Additionally, the proposed building would not be visible from these dwellings, as the existing school building would be sited in front, therefore preventing views from West End Road. In relation to the remaining surrounding dwellings, the school is located to the rear of the buildings, and is spatially disconnected via the existing sports fields. The school is also partially shielded by a row of hedges along the rear of dwellings on Thurlstone Road, Torrington Road and Berkeley Close, and is thus further shielded from residential views. As a result, the proposed siting would not be visible or have a prominent impact upon amenity in the locality, having been sited on the Eastern side of the school to ensure maximum separation and being carefully designed to best employ natural landscaping to minimise visual impact.

The proposed extension to the existing building would be enclosed by the existing built form and would span a single storey, therefore being overshadowed by the adjacent three storey existing built form.

With regard to traffic generation, the Transport Assessment concludes that the uplift in pupil and staff numbers resulting from the new school development can be accommodated without causing adverse impact upon the highway network in terms of unacceptable increase in traffic generation or likely demand for additional on street parking at peak times. The site is well served by public transport and pedestrian/cycle facilities and the Travel Plan sets out robust measures for reducing car born trips and diverting this away to more sustainable modes such as local public transport.

The level of parking on site will remain as it is currently, with the existing 79 car parking spaces retained, which is considered to adequately balance the needs of the school for staff parking and the policy focus to promote more sustainable

means of transport to and from the school. Analysis of accident data for the local area shows no accident patterns that would give rise to concerns over road safety relating to the school.

Further technical assessment of external lighting, flood risk, noise and contamination concludes that any safety, amenity or health issues can be positively managed to guard against adverse impacts.

Scale/Respect for Context: The scale of the new building is appropriate to its nature of use and location. The new building would retain the prevailing three-storey scale of development present on the site, and would be largely obscured from public views from the West, being located behind the existing building. In views from the East and North, along Dartmouth Road and Torrington Road, the new building would appear as part of the consolidated school development, respecting the overall scale and form of development established here.

The Northern section of the proposed building would be designed with a sloped, green roof, mirroring the existing school's sloped green roof and creating a gullwing shaped development, thus leading to a homogeneous design throughout the school's built form. The extension to the existing building would also be in keeping with the scale, spanning a single storey in the same manner as the section it would be attached to. The proposal would not impact the existing entrance and access.

Layout: The objectives for the site layout are set out in the Design and Access Statement, and detail how the layout has responded to the comments received during discussions and pre-application engagement meetings to produce a site layout which adequately provides for its end users' needs and facilitates effective management.

External Appearance/Materials: The façade materials for the new building will include white colour through render over blockwork at ground floor level with curtain wall glazing on either side of the sixth form social areas. Aluminium composite and Trespa panels of varying colours in keeping with the existing school have been selected for the upper levels. A green roof is proposed for the new building to tie in with the existing development as well as the surrounding

open green space. The choice of materials is intended to provide the school with a strong contemporary image that is not only in keeping with its strength of purpose and educational orientation and specialisms, but also in keeping with the sensitivities of the site and surroundings.

Trees and Landscaping: The proposed development would lead to the loss of 4 'C' category trees, 1 'C' category group and part of 1 'C' category group. Category C trees are identified in the submitted AIA document as being limited landscape amenity value. The proposal would involve the redevelopment of the existing informal social space, located between the existing sports pitch and long jump pit, and the addition of a line of trees on the boundary between the lawn and the open space located to the East of the site. The boundary between the sports pitch and proposed lawn area would be reinforced with a combination of ornamental shrub planting and native hedge planting, in order to improve green spaces and create a natural boundary between the two distinct elements. Additional trees would also be implemented along the sports pitch's northern boundary and the long jump pit's southern boundary, thereby reinforcing the spatial disconnection between the school and surrounding spaces. Finally, additional trees would be planted in the courtyard space, located between the existing and proposed buildings which would mitigate the limited loss of trees required to facilitate the new building. The location of development would not prejudice the long-term health or special character of the neighbouring Nature Conservation Site. A further Ecological Appraisal accompanies the application, setting out the required actions which must be taken in order to maintain and enhance the site's landscape.

Safety and Security: Security both physically and perceptually is an important aspect of the design of the development. The security strategy as set out in detail in the Design and Access Statement details the public-private zoning that is integral to the design and layout of the scheme. The strategy is designed to provide a safe, secure environment for both students and staff at all times by creating clear boundaries between the outdoor learning areas and the community.

Access for All: As detailed in the Access section of the DAS, the design for the school has been formulated to ensure free flow throughout the site. Public spaces and pedestrian routes have been designed to provide easy access for all, and the proposal includes the addition of two three-storey staircases, connecting the two buildings and creating a continual flow of circulation throughout the school. The scheme has been designed to ensure the principles set out at Policy 7.1 of the London Plan, in relation to inclusive environment, are reflected.

4.5 Landscape

Landscape Design

- 4.5.1 The proposed landscape strategy for the site is integral to the design and formation of the school layout and is detailed in full in the DAS.

Soft Landscaping: planting within the school grounds is important to provide enclosure shelter, shade, interest for wildlife and general visual attractiveness. The overriding aims for the landscape design are to retain and enhance as much of the soft vegetation on site as possible and to mitigate any loss where this is unavoidable, but also to create spatial definition and to reinforce character areas whilst enhancing ecology and biodiversity across the site. Plant species have been selected according to their properties (e.g. non-toxic fruit or seed varieties) and educational/learning value.

Hard Landscaping: a range of materials are proposed for the hard-surfaced areas of the site, selected for their colour and textural properties according to location. The hard materials strategy for the external areas uses a restrained palette of good-quality materials in keeping with the site's context and providing robust, low-maintenance finishes. The proposed building would be surrounded by a combination of concrete slab paving and block paving, which would connect the existing building to the proposed building and delineate the built form from the soft landscaping areas, located to the east of the site. Additional concrete slab paving would be implemented in the proposed lawn, creating a seating area and associated walkway. The existing hard landscaping would be retained.

4.6 Sustainability

4.6.1 Planning policy at all levels recognises the need to address climate change and to reduce the amount of energy consumed by development. The proposed scheme aims to significantly improve the sustainability performance through the following means:

- Minimise energy consumption through passive design
- Maximise daylight whilst minimising unwanted solar gain
- Create visually, thermally and acoustically comfortable environments
- Employ high efficiency plant and distribution services to cut carbon emissions
- Water conservation

4.8.1 These principles are implicit in the design of the new school building and site the details of which are set out in the submitted DAS and Energy Statement.

4.8.2 The Mechanical Services proposed would be designed in accordance with the Department for Education Building Bulletin BB87, BB102, Regulation 88 and BB101. Ventilation methods and levels will also comply with BB93 to ensure CO2 ppm does not rise above 1500ppm level at any time. The noise levels from all new plant would meet CIBSE guidelines. The proposed energy scheme also complies with London Plan policy 5.3 relating to building sustainability and energy performance as well as Policy 5.2 relating to reducing carbon dioxide emissions. The overall sustainability strategy accords entirely with the objectives of the NPPF which supports the prudent use of natural resources and encourages the appropriate use of renewable energy sources

4.7 Site Specific Environmental Issues

Potential for EIA

4.7.1 The new school development could be considered to be an urban development project as set out in Schedule 2 Part 10 of the Town and Country Planning (Environmental Impact Assessment) Regulations 2015. However, the trigger for

EIA is set at 0.5ha of development which is not met by this proposal. The proposal is not therefore considered to be EIA development

Ecology and Biodiversity

- 4.7.2 An Ecology Appraisal has been undertaken by Ecological Planning & Research Ltd (EPR). Despite a number of statutory and non-statutory designated sites within a 5km radius of the site, the appraisal determines that the application would not impact upon any of these designated sites.
- 4.7.3 The report was designed to provide an assessment of the site's potential to provide habitats for protected and other species as well as ecological features of importance within the site. The report goes on to make recommendations on how the proposed building can be built without causing harm to protected species and the landscape of the site.

Bats

- 4.7.4 With regard to bats, a tree inspection survey has been undertaken. The school site is considered to have the potential to support bat roosts in certain mature trees located on the site, due to their cracks, fissures and holes. The scattered trees have also been determined to provide a network of commuting routes and foraging resources for bats in the locality.
- 4.7.5 The report states that, should the development impact upon any of the features or areas suitable for bats, additional scoping and activity surveys, carried out in accordance with Bat Conservation Trust's Bat Surveys Good Practice Guidelines (2012), would be required to determine the extent of the development's influence upon bats in the locality. It is understood that this information will be required from Natural England in the event that the proposed works affect the location of any bat roost present

Biodiversity Enhancements

- 4.7.6 The report goes on to name a number of ecological enhancements that could be implemented in order to protect and maintain biodiversity where possible, in line with schedule 11 of the NPPF, which refers to conserving and enhancing the

natural environment. All of these recommended biodiversity enhancements are proposed to be included within the scheme.

- 4.7.7 Within schedule 11, paragraph 118 of the NPPF it states that when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying a number of principles, one of which being opportunities to incorporate biodiversity in and around developments should be encouraged.
- 4.7.8 In view of the above, the proposed development of the school can be achieved without having a detrimental effect on nature conservation or protected species in accordance with the NPPF, Policy EM7 of the Strategic Policies and saved Policies EC2, EC3 and EC5 of the UDP.

Arboricultural Impact

- 4.7.9 A tree survey of the site has been carried out by EPR which assesses the condition and type of trees located across the site where development is focused. None of the trees located across the site are covered by a Tree Preservation Order and all of the higher order trees (category A and B) trees that exist will be retained. Six category C trees are proposed for removal but will be replaced like for like within the landscape layout. An AIA document has also been produced which includes a preliminary method statement for protecting those trees retained on site throughout construction and beyond.
- 4.7.10 In these ways the new school development would accord fully with the aims and objectives of saved Policies BE38 and OL26 of the UDP and Policy 7.21 of the London Plan which both seek to retain trees of significant amenity value.

Flood Risk and Drainage

- 4.7.11 The site is located within a Critical Drainage Area as shown on the Local plan Proposals map and therefore ensuring an effective drainage strategy is in place for the new school development is of priority. A flood risk assessment has been carried out by Ambiental Technical Solutions Ltd as required for new build development on sites over 1 hectare in size, in line with the amended GDPO requirement that the planning authority should consult the Environment Agency

on major development proposals regardless of the flood risk zone the site may be in.

- 4.7.12 The report states that the site is partially located in Flood Zone 1, partially located in Flood Zone 2, and minimally located in Flood Zone 3, with a small portion of the Southern side falling into the 'High Risk' Zone. The development is considered to be a 'More Vulnerable' development under the NPPF and EA standing advice on development and flood risk.
- 4.7.13 The Environment Agency has identified surface water flooding as the primary source of flooding concerning the site. The site is primarily identified a predominantly 'Very Low' and 'Low' risk area, with the playing field located to the immediate south of the school being identified as 'Low', with small areas of 'Medium' risk.
- 4.7.14 The report concludes that the site is at low risk of surface water flooding and, in accordance with the requirements of the sequential test in the NPPF; the site is suitable for the proposed Ruislip High School extension. Furthermore, the proposed development would be at low risk of flooding from other sources including fluvial flooding, sewers and groundwater.
- 4.7.15 Surface water drainage has also been discussed regarding the development with the introduction of a green roof playing a key part of the surface water strategy which would significantly reduce flood risk at the site.
- 4.7.16 The proposal would therefore meet the objectives of the NPPF, Policy 5.12 of the London Plan and saved Policy EM6 of the UDP in that it would not be at risk from flooding or impact upon flood risk elsewhere.

Contamination

- 4.7.17 A Ground Investigation has been undertaken by Albury S.I. LTD which concludes that the site consists of made ground varying in composition from macadam, overlying sand and gravel, to dark brown silty sand with brick/concrete fragments

- 4.7.18 Below the made ground, brown silty clay with variable round gravel was recorded, which turned to sandy clay below 1.5 to 2.0m. Multicoloured silty clay was recorded below the sandy clay; below 13m, it became multicoloured sandy clay, up to the full depth of the investigation at 15m. These cohesive soils are representative of the Lambeth Group, and are therefore common within the area.
- 4.7.19 The Site Investigation states that made ground is not a reliable ground upon which to secure foundations, and that the proposal should therefore continue foundation excavations through these undesirable materials where they are less than 1m in thickness to this minimum depth
- 4.7.20 A preliminary conceptual site model was prepared to determine the potential for ground contamination. The single source of contamination was the potential presence of an aerial delivered in WW2. Due to the distance to recorded bomb strikes and the site's previous development, it has been considered that there is a low risk, and that no further investigation is required as a result.
- 4.7.21 The report concludes that the site presents no contamination concerns for humans or vegetation, and that waste soil is not hazardous or containing asbestos. As a result, no remediation will be required.
- 4.7.22 The Ruislip High School extension would therefore be fully capable of complying with the general objectives of the NPPF to prevent and/or appropriately manage potential contamination and will accord entirely with Policy EM8 of the Strategic Policies and saved policy EC5 of the UDP. The application proposal would also meet with the requirements of the LBH Land Contamination SPG 2014 which seeks to ensure that the potential impacts of the development by way of contamination are fully assessed and adequately addressed.

Air Quality

- 4.7.23 LBH has declared an Air Quality Management Area (AQMA) across the entire southern extent of their administrative area, due to exceedances of the annual mean nitrogen dioxide (NO₂) objective. The proposed development lies just outside the AQMA but it is acknowledged that the nearby West End Road fall within the designation.

4.7.24 An Air Quality Assessment has been prepared by Aether and is submitted as a supporting planning application documents. The report concludes that no mitigation is required as a result of the proposed school development and air quality objectives will be met. The Travel Plan produced for the school development will also seek to reduce impact further. The assessment concludes that the proposal would meet with London's air quality neutral guidance for building and transport

Noise Impact

4.7.25 A noise assessment has been carried out by Pace which recorded internal and external noise levels across the site and assesses the potential noise impact of the new school development on surrounding residential amenity, as well as potential impact for users of the new building from existing noise sources.

4.7.26 The report concludes that the site's internal noise levels are in line with the BB93 guidance for naturally ventilated spaces, and therefore no additional noise control schemes will be required to make the development acceptable from a noise perspective.

4.7.27 On the basis of the above the new school development is capable of achieving the general objectives of the NPPF, Policy 7.15 of the London Plan, and Policy EM8 of the Strategic Policies and saved Policy OE3 of the UDP.

Lighting Assessment

4.7.28 A general lighting assessment for the new school development has been prepared by Arcadis and is submitted in support of the planning application. These set out the general zoning and type of lighting proposed around the new development and indicates where this comprises existing external lighting and where it would be newly implemented. The document details the type and lux qualities of the external lighting proposed and the strategy proposes the minimum necessary to ensure the safety of users around the site in the evening and night time.

4.7.29 It is therefore considered that the lighting strategy proposed would accord with the aims and objectives of the NPPF to ensure that light pollution from new

development is limited in respect of nature conservation interest and residential amenity.

4.8 Transport Impacts

- 4.8.1 The Transport Assessment prepared by LTP that accompanies the planning application sets out in detail the current baseline position of the school site and calculates the increases predicted in staff and pupil numbers, the mode of travel and the impact of the minor increase in use of the site following the new school development
- 4.8.2 The existing school roll is 1116 pupils, supported by approximately 105 staff. The proposals increase this to 1302 pupils, supported by approximately 123 staff. The net increase in pupil and staff numbers is 186 and 18 respectively.
- 4.8.3 The existing one way westbound clockwise access route with separate access points on to Sidmouth Drive will be retained. The Travel Survey undertaken in May 2017 indicates that approximately 62.2% of pupils are likely to walk to school with 60.5% of staff traveling to work by car. Further surveys of the roads around the school show that parking levels on the assessed Streets did not notably increase around school start and finish times, suggesting there was a minimal amount of on-street pupil drop-offs and pick-ups. The survey concluded that there is ample on-street parking provision on local roads to cater for the additional pupils who will be dropped off and picked up from school.
- 4.8.4 The existing 79 car parking spaces will be retained and it is considered that this is sufficient to cater for the additional uplift in staff numbers associated with the new school development. The TA outlines the policy focus away from overprovision of car parking to ensure that take-up of sustainable modes of transport are not prejudiced. An increase in the number cycle parking spaces from 50 to 76 will be provided also in accordance with adopted cycle parking standards and the demand.
- 4.8.5 The site is served well by non-car transport provision, particularly by bus services at stops within 160m walk. London Underground services are available within 400m walk and the site has good access to the pedestrian and cycle networks in the locality and that serve a large residential catchment area around the school.

- 4.8.6 The proposals have been found to accord with Government and local planning and transport policy objectives, in particular those relating to the need to reduce car travel and the provision of non-car travel option. The local area enjoys access to regular and frequent bus services and good pedestrian and cycle facilities. There should therefore be less reliance on the private car for the majority of pupils and staff at the school.
- 4.8.7 A detailed road safety study has been undertaken for the surrounding highway network. Although the study has identified that there have been 8 fatal accidents on the local or strategic networks under consideration, analysis did not reveal any existing collision issues associated with the expected movements generated by the expanded school. The report concludes that no accident patterns have been identified that would give rise to concerns over road safety relating to the proposals.
- 4.8.8 A trip generation assessment has been undertaken using data collected from a travel survey undertaken in May 2017. From the data collected the Transport Assessment shows how the proposed extension would generate up to 77 trips in the AM peak period, representing an increase of 11 two-way vehicle trips relative to the existing pupil roll, and 40 trips in the PM period, representing an increase in 6 two-way vehicle trips.
- 4.8.9 The proposed Travel Plan will seek to reduce pupil drop-off and pick-up and staff journeys to work by car by active promotion of more sustainable modes such as public transport and walking and cycling. Detailed measures to encourage more sustainable travel are set out within the plan with 5 year targets for the reduction in car based journeys outlined.
- 4.8.10 The Transport Assessment concludes that the proposal should not result in significant detrimental impacts in transport terms, and that any impacts can be mitigated. In direct accordance with the NPPF there would be no “severe” impact upon the local highway network and on this basis, there should be no sound transport based objection to the proposal.
- 4.8.11 In view of these conclusions the new school proposal is considered to directly comply with the objectives of the NPPF and Policy T1 of the Strategic Policies

and Policy 6.3 of the London plan as they relate to the location of development in areas close to services and with high levels of accessibility and ensuring that the full impacts of development on the transport network are fully assessed.

- 4.8.12 Saved Policies AM2 and AM7 of the UDP are accorded with in respect of the low impact of the development in terms of traffic generation and with the level of car parking being considered to accord with adopted standards as referred to at Saved policy AM14 of the UDP

5 Conclusions

- 5.1 The principle of development at the Ruislip High School site is encouraged in established planning policies facilitating new school and further education developments.
- 5.2 The site is located within the Green Chain, but is not located within any statutory land designations.
- 5.3 Heavy support is lent to development proposals relating to state funded schools set out in the ministerial statement with the National Planning Policy Framework also providing significant support for the development of state funded secondary schools.
- 5.4 The local policy framework for such development is geared to making sure its impacts are acceptable. The planning application supporting material has taken account of all possible likely effects taking into account the fact that the proposal would lead to an important change in the site's built form.
- 5.5 A safe and secure academic environment is proposed, allowing students of various physical and mental disabilities an unparalleled opportunity for education. The proposal includes SRP units for autism and physical disabilities, as well as additional classroom, student and staff facilities, an exhibition room and additional recreational facilities in the shape of an external play deck and plant room. The proposal also includes the addition of two staircases, which reorganise the school's student circulation, thereby improving accessibility, safety and legibility.
- 5.6 The site is not liable to flooding and it has been demonstrated that it will not add to flooding elsewhere when redeveloped. Noise has been found to be acceptable for both school users and neighbouring properties and the lighting strategy is found to have minimal impact upon neighbouring residential properties.

- 5.7 Additional landscape design forms part of the planning application proposal. The landscaping will serve the function of defining the social areas, providing spatial subdivision of the site in order to improve legibility, and improving the sense of privacy and security for the school and local users. This involves planting within the site and the use of surface treatments that will waymark the site and define the purpose of different areas. Site security is not just on the outer boundary but is dealt with through the subdivision of the building, use of separate entrances and use zoning throughout the site.
- 5.8 The new extension presents a three-storey development, and is connected to the existing school building via two staircases, providing significant improvement to the existing circulation and accessibility issues the school suffers from. The Design and Access Statement details the integrity and durability of the design concept, with its circulation and principal spaces on the frontage. In terms of visual impacts the building will present an acceptable relationship within the landscape in the locality and will have very little impact upon residential amenity with few direct views of the site being obtainable from residential properties outside of the site.
- 5.9 The standard of construction is high and is capable of high levels of energy efficiency and the minimisation of energy inputs from non-renewable resources. The choice of Photovoltaic panels as has been made relative to other potential renewable energy generation methods, consideration of which is set out in the submitted Energy Statement
- 5.10 On this basis, the impacts of the proposals in relation to these important planning issues are considered to be acceptable. The analysis of relevant policies in this statement shows that the application is presenting a development which accords with the Development Plan and National planning policies. It is therefore commended to LBH, as the relevant planning authority, for a positive decision.