

# Fuller Long

2nd October 2023

Planning Department  
Hillingdon Council

Dear Sir/Madam

## Application for Full Planning Consent at Winston Churchill Hall and Theatre, Ruislip, HA4 7QL

This planning letter is written in support of a full planning application on behalf of Ameresco. The application seeks consent for the installation of renewable energy technologies at the site, further details of which are set out in the proposals section.

The application is located within the London Borough of Hillingdon. The proposals put forward seek to respond to Hillingdon's strategic climate action plan that aims to be carbon neutral by 2030. In order to achieve this the Council are proposing a number of energy saving retrofits to public buildings within the Borough and these proposals will help to meet this objective.

This planning letter will set out the proposal, as well as an assessment of the scheme against national and local planning policy. It should be read in conjunction with the accompanying suite of application drawings and Heritage Statement.

### Site and Surrounds

The site is located in Ruislip, a suburb of west London. The theatre is located to the north of the town centre. It is within an area known as The Manor Farm Heritage Site, which is a community space comprising landscaped grounds, a collection of listed buildings and a scheduled monument. The site location is indicated in the image below.



Image 1. Site Location

# Fuller Long

The existing building is not listed and of little architectural interest (Image 2.).



**Image 2. Winston Churchill Theatre.**

An extract from the Council's planning policy map is included below. It confirms that the site is subject to the following designations:

- Within the Ruislip Village Conservation Area
- Metropolitan Open Land
- Immediately adjacent to a Scheduled Ancient Monument
- Immediately adjacent to a Town Centre



**Image 3. Extract from Council's policy map**

The property itself was constructed in 1965 and is a part single, part two storey building. The two storey element of the building houses the theatre with the original caretakers flat in the single storey element.

Further information on the history and construction of the building is included within the accompanying heritage report.

## Planning History

There is no relevant planning history on the Council's planning register for this site.

## Proposal

The proposals include the following:

- Three Air Source heat Pumps (ASHPs) at ground level on the south elevation, measuring 1300mm by 1012mm at a height of 1700mm surrounded by 2.1m hit and miss fencing and additional planting
- Replacement of existing windows with UPVC double glazing
- 97 PV panels on the roof
- A trench measuring 2.1m (l) x 1.5m (w) x 1m (d) required for low voltage cable connection to existing under footpath
- Cavity wall insulation

## Planning Policy Context

The Development Plan for the London Borough of Hillingdon comprises:

- The London Plan (2021);
- The Hillingdon Local Plan Part 1 - Strategic Policies (2012); and
- The Local Plan Part 2 - Development Management Policies, Site Allocations and Designations (2020).

Other material considerations include:

- National Planning Policy Framework (2021); and
- National Planning Policy Guidance (2021).

The most relevant planning policies are outlined below.

### The London Plan

**Policy HC1** states that development proposals affecting heritage assets, and their settings, should conserve their significance. Development proposals should avoid harm and seek to enhance the assets where possible.

With regards to cultural facilities and creative industries (including theatres) **Policy HC5** confirms that existing facilities and venues should be protected. The subtext to the policy recognises the economic and social benefits that such facilities provide for the capital, and the opportunities they provide for Londoners.

**Policy G3** states that Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green belt. MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt.

Chapter 9 of the London Plan relates specifically to sustainable infrastructure and reducing emissions and creating sustainable developments.

### Local Plan Part 1

**Policy EM1** of the Local Plan Part 1 has the aim of reducing climate change. It states that the Council will work with developers to provide efficiency initiatives and it further states that they will promote decentralised energy. The Council also confirms through this policy that they will encourage the installation of renewable energy.

**Policy EM2** seeks to maintain the current extent, hierarchy and strategic functions of the Green Belt, Metropolitan Open Land and Green Chains. Any proposals for development in the Green Belt and Metropolitan Open Land will be assessed against national and London Plan policies, including the very special circumstances test.

Safeguarding and enhancing existing cultural facilities, which includes theatres, is the aim of **Policy CI3**. The policy notes the importance of such facilities to residents' quality of life and broadening cultural experience.

**Policy HE1** relates to the heritage of Hillingdon. It states that heritage assets will be conserved and enhanced. It also notes that the modification of heritage assets may be acceptable when considering proposals to mitigate or adapt to the effects of climate change.

## Local Plan Part 2

With regards to Heritage, **Policy DMHB 1** states that the Council will expect development proposals to avoid harm to the historic environment. It states specifically that:

"Development proposals affecting designated heritage assets need to take account of the effects of climate change and renewable energy without impacting negatively on the heritage asset".

**Policy DMHB 4** relates specifically to conservation areas and expects development within these areas to preserve or enhance the character and appearance.

Paragraph 5.23 further states that Scheduled Ancient Monuments will be protected in accordance with national guidance.

The design of new development is guided by **Policy DMHB 11**. It expects all development, including extensions and alterations to existing buildings, to be of the highest standard and incorporate principles of good design. Good design will take account of the local character and context and use high quality building materials and finishes.

**Policy DMEI 4:** states that inappropriate development on Metropolitan Open Land will not be permitted unless there are very special circumstances.

## Planning Consideration

An assessment of the proposals against planning policy is provided below.

### Principle of Development

The proposals put forward will provide space heating and hot water for the building with a view to significantly reducing the site's carbon emissions by removing its natural gas users, upgrade its ageing energy infrastructure, extend the life and optimise operation of existing equipment. It will also improve comfort levels for staff and building users. The proposals will help to support the running of the existing theatre, ensuring it can operate more efficiently. Theatres are notoriously expensive to operate owing to the necessity to heat a large space, whilst also providing the broad range of lighting necessary for theatre productions.

Employing the use of photovoltaic panels will allow electricity to be generated on site which can provide some of the electricity requirements for the ASHPs. Similarly, the air source heat pumps are a far more efficient way of heating and cooling the property, again reducing costs.

Both national and local planning policy places a strong emphasis on protecting existing cultural facilities, through London Plan Policy HC5, and Local Policies CI3. Allowing the proposals within this application

will enable the facility to keep operating and will help to safeguard it for the future. This is entirely in line with policy aims and therefore we contend that the principle of development is accepted.

As outlined in Policy G3 of the London Plan, Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt. MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green belt.

We therefore refer to the relevant paragraphs within the NPPF relating to the Green Belt below.

In terms of the preservation of openness, the ASHPs will be located adjacent to the building and will be screened with fencing and additional planting, such that the openness of the MOL is not unduly affected. Further the PV panels will be located on the roof and will not increase built form. Consequently it is considered they would not appear prominent or harmful to the openness of the MOL..

Notwithstanding the above, we do note that paragraph 151 suggests that elements of many renewable energy projects will comprise inappropriate development and developers will need to demonstrate very special circumstances. Accordingly, these are set out below.

#### *Very special circumstances*

Paragraph 98 of the NPPF recognises the importance of access to quality open spaces and opportunities for sport and recreation. Furthermore, paragraph 106 advises planning policies should support an appropriate mix of uses across an area including leisure and educational facilities. As officers will be aware, theatres are notoriously expensive to operate owing to the necessity to heat a large space, whilst also providing the broad range of lighting necessary for theatre productions. The provision of the renewable energy technologies proposed here will assist in securing the future of this important community facility in accordance with the recommendations of the NPPF.

In addition to the above, part of Hillingdon's strategic climate action plan is to become carbon neutral by 2030. Accordingly, the Council are proposing a number of energy saving retrofits to their public buildings within the Borough. In accordance with this objective the proposed development will allow the building to work towards becoming carbon neutral in line with government and local policies.

In our view the above represent very special circumstances which would outweigh any technical harm to the MOL caused by reason of inappropriateness.

#### Heritage and design

The building which is subject of this application is not listed, but it is located within a conservation area and adjacent to a scheduled monument. As such, the proposals have been developed with this in mind and an assessment of the heritage impact has been undertaken and is set out in the Heritage Statement which accompanies this application.

Only a small number of PV panels will be visible from Manor Farmhouse and the Motte and Bailey, but trees are proposed to shield the theatre from the south of the site, in accordance with conservation officer advice and therefore will have little to no impact on the setting and character of the building or area. Similarly, the three air source heat pumps will be screened by a 2.1m timber fence and additional planting in order to reduce any negative visual impact. Its location has been chosen to reduce visibility and its relatively small scale will be subservient to the main building and will not impact on the heritage assets to the south or the character and appearance of the conservation area.

Finally the replacement fenestration with double glazed UPVC windows will be designed to match the style and appearance of the existing and will therefore not be viewed as a detracting feature that negatively impacts the building, the heritage assets to the south or the conservation area.

Local policies HE1 and DMHB 11 note the need to make modifications to existing heritage assets to adapt to climate change. As such, it is considered that the proposals will help to achieve this aim in the least visually intrusive way possible.

## Sustainability

The key aim of the proposals is to increase the sustainability of the facility by incorporating sustainable energy techniques. Photovoltaic panels and air source heat pumps will reduce the facility's reliance on traditional energy sources, thereby improving its energy efficiency. The proposals therefore meet the requirements of Policy EM1.

## Amenity

The photovoltaic panels will not cause any issue in terms of amenity. The air source heat pumps will be located on the southern elevation of the building. The noise associated with this unit will be minimal and unlikely to be audible above the day to day noises in an urban area such as this.

A noise report by A F Acoustics is submitted in support of the application which concludes that the proposed plant meets the LPA's requirement that the plant is 5db below the background noise level at the nearest residential receptors.

As such, it is not considered that there will be any negative impact on neighbouring amenity as a result of the scheme.

## Conclusions

The proposals will help to achieve a more energy efficient facility which will consequently help to ensure the sustainability of the theatre and its continued operation into the future.

The proposals will not give rise to any negative impact in terms of amenity and will comply with the relevant Hillingdon planning policies

Protecting and enhancing community facilities and leisure activities is a key national and local planning priority and these proposals will help to achieve this aim. It is therefore respectfully requested that planning permission is granted.

We look forward to hearing from you. .

Your sincerely

Clare Preece  
Planning Director

FullerLong