



FULL PLANNING AND LISTED BUILDING CONSENT FOR PROPOSED CHANGE OF USE OF BARRA HALL CHILDREN'S CENTRE (USE CLASS E(f)) INTO EDUCATION PROVISION (USE CLASS F1(a)), FOR A NEW SEND SCHOOL. THE WORKS INCLUDE: A) INTERNAL ALTERATIONS INCLUDE WIDENED AND NEW DOOR OPENINGS, RECONFIGURED TOILET AND TEACHING SPACES, NEW SAFEGUARDING MEASURES, UPGRADES TO THE SENSORY ROOM, ALTERATIONS TO THE TEACHING KITCHEN AND RELOCATED STAFF AREAS; B) EXTERNAL ALTERATIONS INCLUDE THE INSTALLATION OF AN EXTERNAL AIR SOURCE HEAT PUMP, NEW FRENCH WINDOW DOOR SET AND A NEW ORANGERY AND SECURITY BUILDING, A REFURBISHED ENTRANCE GATE AND A PEDESTRIAN SECURITY GATE, CAR PARK CLEARANCE AND REPAINTING, A NEW ROAD LAYOUT AND ROUNDABOUT AND ALL ASSOCIATED WORKS INCLUDING LANDSCAPING AND INCLUSION OF CYCLE AND REFUSE PROVISIONS.

BARRA HALL, BARRA HALL PARK, WOOD END GREEN ROAD, HAYES, HILLINGDON, UB3 2SA

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*Prepared for:*

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## 1. INTRODUCTION

- 1.1 This planning statement has been prepared by 3BM Planning in support of a full planning and listed building consent application on behalf of 'Harrow, Richmond and Uxbridge College (HRUC)' (The Applicant).
- 1.2 The proposed change of use of Barra Hall Children's Centre (Use Class E [1]) into an Education Institution (Use Class F1[a]) will create 70 spaces for pupils aged 16-25 with special education needs and disabilities (SEND) and 35no of new staff.
- 1.3 The application site is identified in the enclosed Site Location Plan.
- 1.4 The building has been vacant since February 2024. Its last use was the children's centre. It was acquired (freehold) by The Applicant on the premise it would be used as an SEND school, hence the need for this planning application.
- 1.5 This statement demonstrates that:
  - (i) The proposed development represents an 'appropriate use' within the Metropolitan Open Land and Hayes Archaeological Priority Area.
  - (ii) The proposed development successfully balances the need to provide a SEND provision for pupils aged 16-25, with the need to protect and enhance the Grade II Listed 'Barra Hall' building.
  - (iii) The proposal will not have any unacceptable adverse impact on the local amenity including on the openness of the Metropolitan Open Land and the historic setting of Hayes Village Conservation Area.
- 1.6 **Section 2** describes the application site and surroundings including relevant planning designations and key site planning history, **Section 3** sets out the key aspects of the proposed development including the Background Education Need Case, **Section 4** identifies relevant planning policy, **Section 5** provides an assessment of the proposals against planning policy and **Section 6** is the summary and conclusions.

## 2. THE NEED FOR THE PROPOSED DEVELOPMENT

2.1 This planning application has been prepared and submitted following an identified need for additional SEND place provision in the London Borough of Hillingdon. To assist in clarifying this need, The Applicant (HRUC) has provided the following justification / education needs case.

### Background

2.2 The site has been acquired by The Applicant to expand its SEND provision, to enhance service delivery, and improved quality of provision and positivise outcomes for students with special education needs.

2.3 Barra Hall is located in Hillingdon, and the proposed change of use will enable HRUC to offer a high quality tailored educational environment serving the needs of Hillingdon and the wider boroughs.

2.4 The enclosed planning application will help to expand capacity to meet the current and future demand in relation to the local authority's offer for SEN young people and ensure compliance with regulatory standards.

### Strategic Case

2.5 The strategic case for this planning is built on three core elements.

- i) **Alignment to The Applicant's strategic plan.** Its 2030 vision details several critical objectives to meet the needs of the local community for those with special educational needs. Specifically, the plan states that The Applicant will '*commit to deliver the support for each and every learner*' and '*enable every student with learning difficulties and disabilities to develop foundation and independent living skills, empowering them to reach their full potential*'. These objectives can only be met with adequate facilities to meet the growing demands of the student population. The Applicant's current facilities in Uxbridge is already at capacity and cannot be easily adapted to grow due to space restraints.
- ii) **HRUC to be a system leading college.** One that delivers on being the college of choice for the local communities it serves. There is clear evidence that there is a deficit in the amount of provision available to service the needs of students with disabilities. This is reinforced by the local authority decision to The Applicant to acquire Barra Hall, driving significant local benefits. It will cement HRUC as the lead provider in the local communities it serves.
- iii) **Long term investment.** Strategic use of reserves to expand the future business and earnings potential of the college. Investment of cash reserves into capital asset that in turn will increase revenue.

## Operational Case

- 2.6 There is a rising demand for SEND services due to increased awareness and diagnosis of special educational needs. Local authorities and parents are seeking high-quality specialist provision that is in the borough and closer to home.
- 2.7 Transport costs significantly decrease for in borough provision, resulting in further cost efficiencies for the local authority and driving the value-added benefit. There should be no transport or access concerns with the location of Barra Hall. The Applicant anticipates no operational concerns, consideration or restraints in relation to the geographical location of Barra Hall in terms of access and service provision.
- 2.8 In borough provision will provide the local authority with significant cost savings and ensure further cost efficiencies in relation to High Needs budget. It also provides them with a disposal of Barra Hall for an important strategic case.
- 2.9 Data provided by the local authority states an upward trajectory of high needs commissioned places, suggesting an average of 72 additional places required for SLD/MLD/PMLD, year on year between 2025 and 2030.
- 2.10 Barra will service the additional demand for SLD places. In addition, Uxbridge currently has a very small SLD provision which The Applicant would intend to transition into Barra (up to 35 places). The freed-up space at the main Uxbridge campus will be utilised for expanding additional MLD SEND provision in Uxbridge (those that are almost ready to transition onto other mainstream college provision). This strategic reallocation can further enhance overall service delivery and additional income into Uxbridge to optimise resource use.
- 2.11 There are no current or anticipated staff recruitment challenges servicing SEND provision across HRUC.
- 2.12 The annual running costs are estimated which includes energy, rates, cleaning, security, insurance and maintenance. Depreciation costs are calculated based on HRUC's policy of depreciating land and buildings over 50 years. Attached to this paper is a separate breakdown on anticipated operational costs for the running of Barra Hall. These have all been included within the financial case.
- 2.13 Additional health and safety provisions are required for high needs students. These include ensuring physical accessibility, managing sensory sensitivities, and addressing specific medical and behavioural needs. Safety plans should account for students who need assistance during evacuations and those with specific medical conditions. There are no issues or constraints specific to Barra Hall. This is standard practice and is something that is done across all of its SEND provisions with costs being met from the standardised income for each learner (as per practice across HRUC).

## Alternative Options

2.14 At the time of purchase, no comparable sites had been identified in respect of availability, size requirements and suitability for use (existing or via conversion) for SEND school use.

2.15 Barra Hall is now within the freehold ownership of The Applicant, with a commitment for it to be used for SEND use.

2.16 It was identified initial due its availability, and the nature of it being private and enclosed. This is essential for SEND provision due to security and health and safety considerations for learners who are high risk and vulnerable. Barra Hall has private gates and surrounded by secure fencing.

## Condition / Finance Case

2.17 A full condition survey was completed. It is clear that the building is need of remedial intervention, to increase its lifespan and to protect its Listed Building status.

2.18 Total remedial works requires immediate investment covering the external fabric, grounds, roofing and electrics. Further spend is required to address saturated render and cracking within all elevations.

2.19 The proposed development represents a viable, deliverable and suitable opportunity to ensure the required remedial works are secured and it will ensure the current vacant building is being used appropriately.

## Summary

2.20 Acquiring Barra Hall represents a strategic investment that can significantly enhance the education service quality of HRUC, whilst expanding capacity within the SEND provision.

2.21 It will secure a long-term partnership with the local Borough which HRUC may benefit further from in the future. This financial model and investment case will meet the immediate demand for provision and enable us to apply the same model to consider how best to service the growing demands in Harrow, through exploring further development at Harrow Weald campus, particularly the south field.

2.22 From a planning perspective, the proposed development represents a viable and deliverable means of ensuring the Listed Building secures urgent necessary remedial works to help increase its lifespan and protect its heritage character. The changes since the recently approved planning application are minimal and would not create any additional impacts.

### 3. SITE AND SURROUNDINGS (INC. PLANNING DESIGNATIONS AND SITE HISTORY)

#### Site and Surroundings

- 3.1 Barra Hall was most recently used by Hillingdon Council as a children's centre (Use Class E [f]). The building is situated within Barra Hall Park, in the southeast of the London Borough of Hillingdon.
- 3.2 It has been vacant since February 2024.
- 3.3 The children's centre closed in February 2024 when the new Hayes Family Hub was completed. In October 2024, Hillingdon Council sold Barra Hall to HRUC with the intention to create a new SEND facility.
- 3.4 To the north, the site is bounded by Wood End Green Road with 2-storey residential development. Beyond the park, the western boundary also consists of 2-3 storey residential development. To the east and south is the Barra Hall Park estate.
- 3.5 The application site (or Red Line Boundary) is comprised of a section of land within the Barra Hall Park estate, situated in the northwest of the park. The Barra Hall site is separated from the park by a metal palisade fence with double metal gates.
- 3.6 Accordingly, the application site consists of Barra Hall, ancillary buildings, and hard-standing vehicular parking. Main vehicular and pedestrian access is via Wood End Green Road from the site's northern boundary.

#### Planning Designations

- 3.7 According to the Policies Map of the Local Plan Part 2, the site is situated within Hayes Village Conservation Area, and the Hayes Archaeological Priority Area. The site also forms part of the designated 'Metropolitan Open Land'.
- 3.8 According to the Historic England online search facility, Barra Hall 'Hayes Town Hall' is a Grade II Listed Building (List Entry Number: 1080105).

#### Official List Entry:

1. 5018 WOOD END GREEN ROAD (South Side) HAYES Hayes Town Hall TQ 0981 27/467
2. *Mid-late C19 building in a sort of Jacobean style with Scottish baronial touches. 2 storeys, irregular. North (entrance) front of 4 bays, the left a chimney bay. Stucco with tiled roofs. Varied skyline of plain and shaped gables with ball finials. Mullioned and transomed casements, some in projecting square or canted bays. Continuous*

*hoodmoulds over 1st floor windows. Projecting porch with battlemented parapet. Similar long south-west front of L-shape, with round projecting turrets at outer angles.*

- 3.9 The Environment Agency's online flood map facility confirms that the entire site falls within Flood Zone 1, which corresponds to a low risk of flooding.
- 3.10 It is understood that none of the trees within the application are covered by TPO. However, certain trees that have a diameter greater than 75mm, measured at 1.5 metres above the ground will need consent given its Conservation Area setting.

### **Site Planning History**

- 3.11 The wider site has an extensive planning history, the most notable cases are summarised below:
- 3.12 Planning permission & Listed Building Consent was approved on 10.06.2025 under Hillingdon ref 8134/APP/2025/404 & 8134/APP/2025/405 for the '*Change of use of Barra Hall Children Centre (Use Class E(f)) to Use Class F1(a), internal alterations, installation of external heat pump, refurbishment of existing windows, external alterations to include landscaping works and replacement of shed*'.
- 3.13 Planning permission was approved on 14.01.2022 under Hillingdon ref 8134/APP/2021/2147 for the '*Barra Hall CCTV upgrade and new CCTV column addition*'.
- 3.14 Listed Building Consent was approved on 30.10.2012 under Hillingdon ref 8134/APP/2012/268 for the '*Listed building consent for alterations, repair works (including to roof), rendering of gables, internal decoration and refurbishment and associated works to Barra Hall.*'.
- 3.15 Planning permission was approved on 08.06.2006 under Hillingdon ref 8134/APP/2006/1312 for the '*Erection of a 1.8m high fence including gates.*' Linked to LBC (8134/APP/2021/2148)
- 3.16 Planning permission was approved on 10.09.2004 under Hillingdon ref 8134/APP/2004/1260 for the '*Internal and external alterations to include erection of a glazed canopy to provide play area, rebuilding of existing entrance lobby and installation of new windows and vehicle turning area.*'.

#### 4. THE PROPOSED DEVELOPMENT

4.1 The development is detailed in the accompanying plans and Design and Access Statement. Key aspects of the development are summarised below:

4.2 The proposal comprises a series of internal and external alterations to improve accessibility, functionality and safeguarding within the building, primarily to support learners with Profound and Multiple Learning Difficulties (PMLD), with associated benefits for Moderate (MLD) and Severe Learning Difficulties (SLD) learners.

(i) Internal Works

- a. Alterations to Door Openings (Ground Floor) - Widening of existing door openings and formation of new doorways to improve circulation and accessibility for PMLD learners.
- b. WC and Hygiene Facilities - Reconfiguration of toilet layouts on the ground floor to meet PMLD requirements and revised toilet layouts on the first floor to improve functionality, cost efficiency and spatial efficiency.
- c. Teaching and Learning Areas - Reorganisation of teaching spaces on both floors, including revised room layouts and updated internal finishes (where confirmed), to support enhanced accessibility and teaching practices for PMLD learners on the ground floor and consequently MLD/SLD learners on the first floor.
- d. Safeguarding Measures - Installation of new security provision at the base of the main staircase to ensure safe movement and supervision of PMLD learners. Installation of new safety screens with high-level perspex panels and handrails to all existing timber balustrades and balusters.
- e. Sensory Room Upgrades - Upgrades to the heating system and wall coverings within the Sensory Room to improve environmental comfort and therapeutic use for PMLD learners.
- f. Teaching Kitchen Alterations - Amendments to the existing teaching kitchen to accommodate a new preparation kitchen area.
- g. Staff Accommodation - Relocation and reconfiguration of staff rooms and office spaces on the first floor to support revised departmental adjacencies and operational needs.
- h. General Alterations - Construction of new internal walls with skirtings and architraves to match historic/local detailing. Installation of new internal doors to match existing. Provision of hardwood double-glazed sash units fitted into existing frames and cills. Installation of a new

French window within an existing opening. All student-area doors to be made accessible, including push-to-open systems for heritage doors and lever handles for new doors.

(ii) External Works

- a. Installation of a new French window door set at the future Orangery location.
- b. Construction of the proposed new Orangery extension.
- c. Refurbished entrance gate and post from storage to be re-installed.
- d. Proposed Security Building located on existing site.
- e. Installation of 1.8m high pedestrian gate with security.
- f. Existing Buggy Store to be re-purposed as Bike Store.
- g. New road layout and roundabout, including grass verge/island.
- h. New secure garden space for PMLD learners with new 2m High Paladin Fence (painted green).
- i. Installation of relocated low fence and gate.
- j. Existing carpark areas to be cleared of moss, with bay lines re-painted.
- k. And all associated landscaping works including refuse and cycle storage provisions.

## 5. PLANNING POLICY

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 and Section 70(2) of the Town and Country Planning Act 1990 requires all planning applications to be determined in accordance with the development plan, unless material considerations indicate otherwise.
- 5.2 The Development Plan in this case comprises the London Borough of Hillingdon Local Plan: Part 1- Strategic Policies (Adopted 2012) and The Local Plan: Part 2- Development Management Policies (Adopted 2020) and Local Plan: Part 2- Site Allocations and Designations (2020). Relevant policies from these documents are identified below.
- 5.3 In addition to the Development Plan, other policy documents such as the National Planning Policy Framework (NPPF) also represent material considerations in the assessment of proposals. Accordingly, relevant policies from non-development plan documents have also been identified below.

### The Development Plan

#### **The London Borough of Hillingdon, The Local Plan: Part 1 – Strategic Policies, 2021**

- 5.4 Policy HE1 (Heritage) seeks to ensure that the council's historic environment including settings and wider historic landscape are conserve and enhanced.
- 5.5 Policy BE1 (Built Environment) states that the council will require all new development to improve and maintain the quality of the built environment to create successful and sustainable neighbourhoods.
- 5.6 Policy EM2 (Green Belt, Metropolitan Open land and Green Chains) states that the council will maintain the current extent, hierarchy, and strategic functions of the Green Belt, Metropolitan Open Land, and Green Chains. It seeks to protect areas of Metropolitan land from development.
- 5.7 Policy EM8 (Land, Water, Air, and Noise) states that all development should not cause deterioration in the local air quality levels. The council will seek to ensure that noise-sensitive development and noise generation development are only permitted if noise impacts can be adequately controlled and mitigated. For developments on contaminated land, the council will expect mitigation strategies that will reduce the impacts in surrounding land uses. For water resources, the council will require all new developments to demonstrate the incorporation of water efficiency measures within new developments. This is on top of safeguarding and improving all water quality, both ground and surface.

## The London Borough of Hillingdon, The Local Plan: Part 2 – Development Management Policies, 2020

5.8 Policy DMCI 1 (Retention of Existing Community Facilities) states that proposals involving the loss of an existing community facility will be permitted if: A) The specific use is no longer required on-site; B) The activities carried out are inconsistent and cannot be made consistent with acceptable living conditions for nearby residents; and C) the redevelopment of the site would secure an over-riding public benefit.

5.9 Policy DMCI 1A (Development of New Education Floorspace) proposals for new schools and school expansions will be assessed against the following criteria: A) the size of the site, its location and suitability to accommodate a new school or school expansion, taking into account of compatibility with surrounding uses and existing planning policy designations; B) the impact on green space, game pitches, outdoor play and amenity space, taking account the character of the area; C) the location and accessibility of the site; D) the design attributes of the building contributing toward the government target of schools and colleges to be zero carbon from 2016.

5.10 Policy DMCI 2 (New Community Infrastructure) states that proposals for the refurbishment and re-use of existing premises for community facilities will be supported.

5.11 Policy DMEI 4 (Development on the Green Belt or Metropolitan Open Land) will not permit inappropriate development in the Green Belt and Metropolitan Open land unless there are very special circumstances. It further states that extensions and redevelopment on sites in the Green Belt or Metropolitan Open Land will only be permitted where the proposal would not have greater impact on the openness of the Green Belt and Metropolitan Open Land.

5.12 Policy DMHB 1 (Heritage Assets) seeks to ensure that developments are to sustain and enhance heritage assets.

5.13 Policy DMHB 2 (Listed Buildings) seeks to protect Listed Buildings. Alterations, extensions, or changing the use of a statutory Listed Building will only be permitted if they are considered to retain the significance, value and are appropriate in terms of the fabric, historic integrity, spatial quality, and layout of the building. Any additions or alterations to a Listed Building should be sympathetic in terms of scale, proportion, detailed design materials, and workmanship. A Heritage Statement should also accompany the planning application to demonstrate a clear understanding of the importance of the building and the impact of the proposals on its significance.

5.14 Policy DMHB 4 (Conservation Areas) seeks to ensure that developments are to preserve or enhance the character or appearance of conservation areas. Developments are expected to sustain and enhance its significance and make a positive contribution to local characters and distinctiveness.

5.15 Policy DMHB 7 (Archaeological Priority Areas and archaeological Priority Zones) seeks to ensure that sites of archaeological interest are not disturbed. If it cannot be avoided, measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works.

5.16 Policy DMHB 14 (Trees and Landscaping) states that all developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

5.17 Policy DMT 1 (Managing Transport Impacts) states that developments are required to meet the transport needs of the development and are expected developments to address transport impacts in a sustainable manner.

#### [\*\*Hillingdon Local Area, SEND and Alternative Provision Strategy for Children and Young People 0-25 years, 2023-2028 Strategy\*\*](#)

5.18 The local area has 5 ambitions overarching the strategy for children, young people, and young adults with SEND. These are: i) The right to support at the right time in the right place; ii) Fully inclusive education for all; iii) Provision meets the needs of Hillingdon's children and young people; iv) Children and young people live happy and fulfilled lives where they are included in the community and; v) There is a flexible offer and range of intervention for children to access alternative provision.

#### [\*\*The London Plan, 2021\*\*](#)

5.19 Policy D4 (Design) seeks to ensure all development is of high-quality design and respects the character and townscape of the location.

5.20 Policy D5 (Inclusive Design) states that proposals should achieve the highest standards of accessible and promote inclusive design.

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

5.22 Policy GG1 (Building strong and inclusive communities) seeks to ensure the delivery of strong and inclusive communities.

5.23 Policy HC1 (Heritage conservation and growth) seeks to protect London's historic environment and requires development proposals be sympathetic to the asset's significance and surroundings.

5.24 Policy S3 (Education) states that proposals should ensure that there is sufficient supply of good quality education and childcare facilities to meet demands from communities.

#### Other ‘Non-Development Plan’ Policy and Background Documents

##### **National Planning Policy Framework, 2025**

5.25 At the heart of the NPPF is a presumption in favour of sustainable development (paragraph 11).

5.26 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 (paragraph 100).

5.27 Good design is a key aspect of sustainable development and should contribute positively to making places better for people (paragraph 131).

5.28 Heritage assets should be conserved in line with their significance as they positively contribute to the quality of life (paragraph 202)

5.29 Local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. (paragraph 207).

##### **The Children and Families Bill Act 2014**

5.30 Section 19 states that the Local Authority must support the need of the child/ younger person and their parent in order to facilitate the development of the child/ young person and to help them achieve the best possible educational and other outcomes.

5.31 Section 27 states that the Local Authority should keep under review educational provision, training provision and social care provision for children and young persons who have special educational needs or a disability.

## 6. PLANNING AND HERITAGE ASSESSMENT

6.1 Section 38 of the Planning and Compulsory Purchase Act 2004 states that decisions on planning applications 'must be made in accordance with the [development] plan unless other material considerations indicate otherwise'.

6.2 This section will assess the suitability of the proposed development against the relevant planning policies identified in Section 5 of this statement. In order to assess the appropriateness of the proposed development, a number of key planning issues have been identified.

6.3 The key planning issues that are considered relevant to the assessment of the enclosed development are as follows:

- A) Principle of Development (including Metropolitan Open Land justification)
- B) Design and Heritage Impact on the Local Amenity
- C) Other Material Considerations
  - Trees*
  - Transport, Parking and Access*
  - Noise*

6.4 Each of the above considerations are addressed in turn below.

**A) Principle of Development**

6.5 The application site has previously been used as Hayes' Town Hall building and originally a residential Manor House. The building recently served as a council-run children's centre (Use class E[f]) together with the associated parking areas.

6.6 The proposal is for the change of use of Barra Hall to accommodate a new SEND facility for pupils aged 16-25 years for Uxbridge College, part of Harrow, Uxbridge, and Richmond College (HRUC).

6.7 A detailed background education case has been made at Section 2 of this Planning Statement. This sets out the current and future need for additional SEND places for the Hillingdon area, the benefits the proposal will secure for HRUC's education service and the local community including travel advantages, and the opportunity presented by this proposal to ensure the Listed Building gets the immediate remedial work needed to maximise its lifespan.

6.8 As detailed in Section 4 of this Statement, great emphasis is placed within planning policy generally on the need to ensure adequate measures are made by local authorities to make certain that there are

sufficient choices of schools available, including Special Educational Needs and Disability Spaces, to meet the changing needs of communities.

- 6.9 The change of use of Barra Hall will enable a new SEND provision within the borough that will provide specialist teaching and tailored support towards each pupil's individual needs. This will prepare students for future independence, overall promoting inclusion and equality.
- 6.10 In light of the above, it is considered the proposals satisfy Local Plan Policies BE1, DMCI 1, DMCI 1A and DMCI 2 and objectives set out in National Policy with regards to the provision of new community facilities and fundamental education objectives.

#### Metropolitan Open Land

- 6.11 To recap, The London Plan Policy G3 states that "*Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt: 1) MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt; 2) boroughs should work with partners to enhance the quality and range uses of MOL.*".
- 6.12 This is echoed in the Hillingdon's Local Plan Policy DMEI 3, which states that only extensions and redevelopment on sites within the Green Belt or Metropolitan Open land will only be permitted where proposals would not have a greater impact on the openness of the Green Belt and the Metropolitan Open Land.
- 6.13 Notwithstanding the use of the site, in most cases development in the Green Belt or Metropolitan Open Land is considered to be 'inappropriate' which by definition, is harmful to the Green Belt or Metropolitan Open Land and should not be approved except in '*very special circumstances*'.
- 6.14 However, Paragraph 154 of the NPPF (2024) provides a criterion for exceptions of inappropriate development in the Green Belt.
- 6.15 Criteria h) states that development can be exempt if "*Other forms of development provided they preserve its openness and do not conflict with the purposes of including land within it.*" Which includes "*iv. The re-use of buildings provided that the buildings are of permanent and substantial construction*"
- 6.16 Whilst the application site is situated within a designated Metropolitan Open Land, the majority of the works consist of internal interventions ensuring efficiency and safety for SEND pupils. Minor external works will take place such as the replacement of a damaged gate and gate post, the installation of air

source heat pumps, and a replacement of an existing shed. No new floor space is being proposed therefore the proposal will not impact the openness of the designated Metropolitan Open Land.

6.17 Based on the above, it is considered the proposal satisfies Hillingdon's Local Plan Policies EM2 and DME1 4 as well as objectives set out in National Policy regarding developments affecting the Green Belt.

#### Archaeological Priority Areas

6.18 The site is situated within an Archaeological Priority Area. However, there are no proposed intrusive groundworks therefore, no archaeological interest is anticipated to be impacted.

6.19 As such, the proposal satisfies Hillingdon's Local Plan Policy DMHB 7 as well as objectives set out in National Policy.

6.20 In light of the above it is considered that the principle of development is acceptable, and that there is an identified need for this proposal in this area.

#### **B) Design and Heritage Impact on the local amenity**

6.21 The project team's objective and overall design philosophy is to achieve an appropriate balance between i) the need to deliver a new SEND facility for pupils aged 16-25 with ii) the need to protect and enhance the Grade II Barra Hall, ensuring the works are sympathetic to the Grade II Listed Building and the surrounding Hayes Village Conservation Area.

6.22 As previously mentioned, external works are very limited as the majority of the works will be internal. The proposed internal works have been carefully considered, designed, and detailed to reinvigorate the existing Barra Hall which is currently in poor condition. The newly added orangery whilst large, it reflects what was originally installed here when referencing historical images. Additionally, the orangery has been designed to be sympathetic to the character and appearance of the host building and surrounding area. Overall, this will result in a space fit for purpose, safe, and stimulating for SEND pupils of HRUC.

6.23 The proposal will not compromise the existing design and appearance of the Grade II Listed Barra Hall nor have an unacceptable impact on the surrounding Hayes Village Conservation Area. For instance, internal fittings and fixtures that have been damaged are proposed to be restored and repaired such as the damaged fireplaces, stained glass panels, and all external windows.

6.24 It is clear that design measures are in place for the proposal to ensure there is minimal (if not zero) impact on the character, appearance, or setting of the Grade II Listed Building and Hayes Village Conservation Area.

6.25 The proposed remedial and refurbishment works, including the proposed adaptations to ensure it is suitable for SEND use, not mentioning the reuse of a vacant Listed building, will help to enhance the character and appearance of the building and its setting.

6.26 In light of the above, it is considered the proposals satisfy Local Plan Policies HE1, BE1, DMCI 2, DMHB 1, DMHB 2, and DMHB 4 and objectives set out in National Policy with regards to conserving and enhancing the historic assets.

### C) Transport, Parking and Access

6.27 As stated in Section 3 of this Statement, there are no proposed alterations to the existing vehicular and pedestrian access to the site. This will remain via Wood End Green Road.

6.28 Works on the physical boundary will heighten safeguarding measures by reinstating the gate post and gate via Wood End Green Road. This will help restrict and control access to the site, ensuring the safety of pupils and staff.

6.29 The former use of the site included a town hall/civic office, and later a children's centre. Both uses would have generated a level traffic movement and on-site parking demand not materially dissimilar to a school use. The children's centre only ceased use in 2024.

6.30 As such, it is considered that the proposal would not have any additional adverse (unacceptable) impact on the local highway network nor local amenity, in terms of traffic generation and parking demand, when compared to previous site operations.

6.31 In light of the above, it is considered the proposals satisfy Local Plan Policy DMT 1 and the relevant objective set out in National Policy.

### D) Other Material Considerations

#### Trees

6.32 As stated in the Design and Access Statement, no trees will be affected by the proposed works.

6.33 New shrubs are proposed to be planted to screen the proposed external air source heat pumps. The proposed shrubs will be carefully selected to be harmonious with the existing landscape and character of Hayes Village Conservation Area.

6.34 As part of the biodiversity net gain report, it has been noted that to achieve a 10% gain, a small number of trees will be required to be planted.

6.35 In light of the above, it is considered the proposals satisfy Local Plan Policy DMHB 14 and the relevant objectives set out in National Policy.

#### Noise

6.36 The distance between the application site to the nearest residential development is approximately 29 metres. It is considered that the Barra Hall building is situated at a sufficient distance from any residential properties to ensure there is no noise disturbance impact on local residential amenity.

6.37 It must also be noted that the most recent use of the site, that ceased only in 2024 (last year), was for a children's centre which would have generated a noise level not dissimilar to SEND school use. As such, it is considered there be no material unacceptable increase in noise level from the proposed use, when compared to a children's centre.

6.38 In light of the above, it is considered the proposals satisfy Local Plan Policy EM 8 and the relevant objective set out in National Policy.

## 7. SUMMARY AND CONCLUSIONS

7.1 This Planning in conjunction with the accompanying documentation collectively demonstrate the reasons why the development should be considered acceptable. These reasons are summarised below:

- (i) It is demonstrated that there is a strong education need case for the development. The site was acquired by The Applicant, from the local authority, on the premise it would be used to create SEND provision.
- (ii) It is demonstrated that the proposal does not constitute an inappropriate development within the Metropolitan Open Land.
- (iii) The proposal represents a high-quality development that will significantly improve the SEND provision within the London Borough of Hillingdon while ensuring the setting and the character of the Grade II Listed Barra Hall and the surrounding Hayes Village Conservation Area are retained and protected.
- (iv) The proposal will not lead to any unacceptable harm to local residential amenity.
- (v) Overall, it is demonstrated that the proposal should be considered acceptable in principle and all other detailed aspects highlighted above.

7.2 Taking all the above into account, it is considered that the proposed development satisfies all relevant aspects of planning policy at national and local levels and should therefore be granted planning permission.