

**JEREMY PETER ASSOCIATES**  
Planning and Development Consultants

21 Britten Road  
Penarth, Cardiff  
CF64 3QJ  
Tel: 02920 703619  
Mob: 07879 626401  
Email: [info@jeremypeterassociates.co.uk](mailto:info@jeremypeterassociates.co.uk)  
Website: [www.jeremypeterassociates.com](http://www.jeremypeterassociates.com)

**PLANNING STATEMENT  
TO ACCOMPANY  
PLANNING APPLICATION**

**FOR CHANGE OF USE FROM FORMER POLICE STATION (SUI GENERIS) TO A  
CHILDREN'S DAY NURSERY (CLASS E (f). ERECTION OF A SINGLE STOREY  
ENTRANCE PAVILION ON THE SIDE (SOUTH ELEVATION) ERECTION OF AN  
ACCESS LIFT ON THE REAR ELEVATION. FENETRATION ALTERATIONS AND  
REMOVAL OF PLANT ROOM REAR EXTENSION. WIDENING OF EXISTING  
CROSSOVER AND LANDSCAPING – APPLICATION REF: 46639/APP/2024/2058;**

**AND**

**LISTED BUILDING CONSENT APPLICATION**

**FOR ERECTION OF A SINGLE STOREY ENTRANCE PAVILION ON THE SIDE  
(SOUTH ELEVATION). ERECTION OF AN ACCESS LIFT ON THE REAR ELEVATION.  
CONSERVATION AND RESTORATION OF THE EXISTING BUILDING FABRIC.  
INTERNAL LAYOUT CHANGES, FENESTRATION ALTERATIONS, RE-SERVICING  
AND REMOVAL OF PLANT ROOM REAR EXTENSION. ALTERATIONS TO  
FENCING AND LANDSCAPING – APPLICATION REF: 46639/APP/2024/2059  
AT  
FORMER POLICE STATION, 2 MURRAY ROAD, NORTHWOOD HA6 2YN**

---

**INTRODUCTION**

These planning application and listed building consent application are for alterations and change of use of the former Northwood Police Station, a grade II listed building, to a children's nursery at 2 Murray Road, Northwood HA6 2YN.

The applications has been submitted with various plans depicting the existing situation and the proposed scheme, as well as various reports and documents including a Design and Access Statement and a Heritage Statement.

This application is a revised application following refusal of a previous planning and listed applications for a similar proposal. It is noted that it was accepted that the principle of a change of use was considered acceptable by the local planning authority.

The previous planning application, ref: 46639/APP/2024/816, was refused for four reasons relating to adverse impacts on the highway; production of unacceptable and unmitigated pollutant emissions; failure to secure 106 planning obligations required to mitigate harm and demand relating to travel planning, air quality, project management and monitoring; and failure of the proposal to accord with relevant Ofsted space standards for the intended occupants.

The previous listed building application, 46639/APP/2024/817, was refused for one reason relating to the failure to preserve the significance of the Listed Building through the loss of the historic fabric.

It is intended in this planning statement to focus on the reasons for refusal for both applications and to demonstrate how this revised application has addressed those reasons for refusal. The current proposal is a revised scheme that proposes reducing the number of child places from 117 to 98 as well as to undertake other amendments to facilitate this.

Consequently it is considered that by addressing those reasons for refusal, the proposed development is now acceptable and will comply with national and local plan policy.

### **PLANNING APPLICATION 46639/APP/2024/816**

#### Reason for Refusal 1 (RR1)

This states:

*The application submission fails to fully demonstrate that the proposal would not give rise to adverse impacts upon the highway network to the detriment of traffic congestion, parking stress and highway safety. Based on the information submitted, the proposed development is considered to have an unacceptable impact on highway safety. As such, the development is contrary to Policies DMT 1, DMT 2 and DME 4 of the Hillingdon Local Plan: Part 2 (2020), and Policies T2, T4 and T5 of the London Plan (2021), and is refused in accordance with paragraphs 115 and 116 of the National Planning Policy Framework (2023).*

The Highways Authority in their very substantive comments that were iterated in the delegated report on the application, were for the most part complementary of many aspects of the scheme in regard to highway matters. Nonetheless it was considered that “given the relatively high level of overall child attendance, it is considered inevitable that arrival overlaps would occur to the potential detriment of internal site workings and the neighbouring highway irrespective of the introduction of allocated time slots per “driven” attendee. Refusal on this basis is therefore recommended. It is highlighted that if the proposed patronage were to be reduced by 40-50% then there may be some potential for achieving adequate leeway between allocated time slots that may alleviate an undesirable overlap scenario and possibly render the application acceptable.”

The applicants have submitted a revised Transport Statement and TRICS data based on the revised lower child place numbers of 98 and up to 24 full and part-time staff members. At

section 7 of the statement – Summary and Conclusion – it is considered that the data demonstrates that the site would generate around 71 two-way traffic movements in the AM peak and 40 two-way movements in the PM peak periods, whilst it has been shown that the car park can accommodate up to 160 two way traffic movements per hour. It is contended that such a number of additional traffic movements will not have any detrimental impact to highway safety. The car parking provided is adequate for the needs of the Day Nursery whilst staff would be encouraged to use alternative transport measures, supported through the production of a Travel Plan.

It is therefore concluded in the Transport Statement that “the proposal of a Children’s Day Nursery at 2 Murray Road is fully in accordance with both National and Regional Planning Policy, particularly in regard to the National Planning Policy Framework in so much as the development would not have an unacceptable impact on highway safety, nor would the cumulative impact be severe. The change of use is therefore considered to be acceptable from a highway point of view.”

It is therefore contended that RR1 has been addressed and resolved.

#### Reason for Refusal 2 (RR2)

This reason states:

*The proposed development would likely contribute to the production of unacceptable pollutant emissions in the Northwood West Air Quality Focus Area and the Northwood East Air Quality Focus Area. Given the uncertainty in the trip generation associated with the operation of the development, it is not possible to ascertain the full measure of transport emissions into the atmosphere and whether the proposed development would be air quality neutral. Further, the proposed development is not air quality positive and the measures proposed are not sufficient to mitigate the total emissions. As such, the development is contrary to Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DME1 14 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 1 of the London Plan (2021) and paragraphs 180(e) and 192 of the National Planning Policy Framework (2023).*

The delegated report indicates that a financial contribution ( of some £83,547) in order to support the implementation of air quality mitigation measures within the Air Quality Focus Areas, would have overcome this reason for refusal. However the Council did not seek the applicant’s agreement on this due to the Highway Authority considering the travel plan to be unacceptable.

As noted in relation to addressing RR1, further information has been submitted with regard to the revised scheme generating a lower trip generation. Also submitted with this application is an additional Air Quality Assessment and Air Quality Positive Statement. The conclusion in the Assessment is that the proposal is not anticipated to generate a significant number of additional road traffic during the operational phase and fall below the criteria proposed by IAQM to proceed to a detailed assessment. It was concluded therefore that the proposed development would not conflict with any national, regional or local planning policy

in relation to construction and operation phase duct and air quality nuisance. Therefore a financial contribution is not required for air quality mitigation measures.

Consequently it is contended that RR2 has been addressed and resolved.

#### Reason for Refusal 3 (RR3)

This reason states:

*The applicant has failed to secure Section 106 planning obligations required to mitigate the harm and demands created by the proposed development (in respect of travel planning, air quality, and project management and monitoring). As such, the development is contrary to Policy DMCI 7 of the Hillingdon Local Plan: Part 2 (2020), the adopted Planning Obligations Supplementary Planning Document (2014), Policy DF1 of the London Plan (2021) and paragraphs 55-58 of the National Planning Policy Framework (2023).*

This reason for refusal is related to RR1 and RR2. However it is considered that these reasons for refusal have been addressed and resolved. That said, should the Council consider that a planning obligation is required, the applicant is more than happy to have this discussion with the Council.

#### Reason for Refusal 4 (RR4)

This reason states:

*The proposal does not accord with relevant space standards provided in Paragraph 3.66 of the Ofsted's 'Early years foundation stage statutory framework'. The proposed development provides a substandard amount of floorspace that would fail to meet the needs of intended occupants. As such, the development is contrary to Policy S3 of the London Plan (2021) and Policy DMCI 2 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020).*

The delegated report notes that there is no prescriptive space standards for nurseries found in the development plan but standards are provided in paragraph 3.66 of the Ofsted's 'Early years foundation stage statutory framework' (2023). These state that for children under two years, there should be 3.5m<sup>2</sup> per child; for two year olds, there should be 2.5m<sup>2</sup> per child and for children aged three to five years, its 2.3m<sup>2</sup> per child.

With this revised scheme, the number of child places has been reduced to 98. It is considered there is sufficient space to accommodate the children as shown on drawing MRN/P3/121. Consequently it is contended that the number of children would accord with the space standards.

Therefore it is considered that this reason for refusal has been addressed and resolved.

## **LISTED BUILDING APPLICATION REF: 45539/APP/2024/817**

The reason for refusal states:

*The proposed development, by reason of the loss of historic fabric, would fail to preserve the significance of the Grade II Listed Building by posing 'less than substantial harm' to the significance of the designated heritage asset. Further, the proposed development is not considered to provide deliverable public benefits sufficient to outweigh the harm posed. As such, the proposal is contrary to Policy HE1 of the Hillingdon Local Plan: Part 1 (2012), Policies DMHB 1, DMHB 2 and DMHB 11 of the Hillingdon Local Plan: Part 2 (2020), Policy HC1 of the London Plan (2021) and paragraphs 205 and 208 of the National Planning Policy Framework (2021).*

It is noted that the delegated report cites that the Conservation Officer in the main welcomes the changes that would better preserve the character of the listed building. However concerns remain regarding the retention and positioning of the police lamp and the call box, as well as lowering of the window to provide external access to the proposed baby room, although this is acknowledged that this is not on the principal elevation.

This revised proposal restores the police call post and police lamp to their original positions which should assuage the Conservation Officer's concerns.

Consequently it is considered that this reason for refusal has also been addressed sufficient to overcome this listed building reason for refusal.

## **CONCLUSION**

The proposal is to alter, extend and convert a former Listed Building into a Childrens Nursery. It is revised proposal for a similar proposal that was refused planning permission and listed building consent earlier in the year. The reasons for refusal for both applications have been carefully considered and addressed by this revised proposal.

It is contended that the revised proposal comprises sustainable development that now accords with national and local plan policy and there is no valid reason why planning permission should be refused.

It is hoped the Council agrees and grants planning permission for the development.