

## Pre-application advice letter from Hillingdon Council, 12 February 2024 – Response notes

Item	Page	Comment	Response
<b>1.</b>	4	<b>Principle of Development</b>	
1.1	5	It is requested that the relevant parts of the Metropolitan Police Estates Strategy, which outline their alternative strategy for Northwood is submitted	<p>The current site owner does not have any access to the Metropolitan Police Estates Strategy. Nonetheless enquiries have been made of the Metropolitan Police and they have responded as follows:</p> <p>“Unfortunately we are not able to comment on the specifics of your proposed application and will leave the local planning authority to comment on the merits of it or otherwise. The current draft estate strategy is yet to be approved by MOPAC and therefore cannot be released for submission in support of this application. I do however attach two documents that may assist. Both documents are in the public domain;</p> <ul style="list-style-type: none"> <li>i) The MOPAC/MPS Public Access Strategy 2017. This document sets out the MOPAC/MPS strategy for public access confirming which police station front counters will be closed and buildings disposed of. The document also responds to the key themes raised during the public consultation process. Northwood Police Office is referenced in the document.</li> <li>ii) Deputy Mayor decision of 30/10/20 confirming Northwood Police Office as surplus and approving the marketing for sale.</li> </ul> <p>I hope this is of assistance.”</p>
1.2	5	A letter of support from the Metropolitan Police Service would also be beneficial	The Metropolitan Police Service has stated that it is not able to comment on the specifics of the proposed application. (see above)
1.3	5	Subject to addressing of material considerations detailed in this report, it is considered that the principle of development is acceptable and accords with the requirements of Policy CI 1 of the Hillingdon Local Plan: Part 1 (2012) and Policies DMCI 2 and DMTC 1 of the Local Plan Part 2 (2020)	Thank you

Item	Page	Hillingdon advice	Applicant response
<b>2.</b>	5	<b>Design: Character and Appearance</b>	
		Exterior	
2.1	6	The Police Station has been empty since 2019 and it is accepted that it will require a new use as its original use is now redundant. The change of use to a nursery would ensure that the building remains as a local community asset rather than being converted to residential use which would limit access to the heritage asset.	Agreed
2.2	6	Exterior - Changes to two windows on front elevation	
2.2.1	6	- The window on the cell wing is not original ... This is found to be acceptable	Agreed
2.2.2	6	- The window on the north front elevation in Baby Room 1 is original. The impact of creating a door in this position is considered to be too high and the applicants should consider using the side window instead in order to better preserve the original front elevation.	The layout has been amended to use the side window on the southwest elevation to create the escape exit from Baby Room 1. The windows on the northwest, Murray Road, elevation will be retained and restored, preserving the appearance of this elevation.
2.3	6	An external lift - This will be on the rear elevation, pitched roofed and weatherboarded. Openings onto each floor will use existing small windows. The Heritage Statement states that this corner of the building was much altered in the 1980s and there is visual evidence of later alterations to the roof and the first floor window in this area.	It is confirmed that this corner of the building has been altered previously with new windows and changes to the brickwork.
2.4	6	Rear extension - This is lightweight, constructed of timber with large areas of glazing and a green roofed extension with ramped disabled access into the building. ... The principle of extending in this location with minimal additional impact on openings is found to be acceptable.	Thank you
2.5	6	Demolition of plant room - this is a later addition on the south elevation, its demolition will have no impact on significance	Confirmed
	6	Interior	
2.6	7	The planform reflects the use for which it was designed, with purpose-built rooms for specific functions for operations as a police station. The change of use to a nursery will necessitate the creation of larger spaces and the demolition of some partition walls. Where these are clearly later additions there is no objection, where the partitions are original 1910 walls there will be direct harm to historic fabric and the architectural interest of the original planform.	The original plans prepared by the architect John Dixon Butler FRIBA in 1908-9 have been obtained from the Metropolitan Police Archives and it is proposed to retain the original planform revealed to the greatest possible extent. In order to facilitate the need for some rooms to be combined into larger spaces suitable for safe nursery use arches will be opened through walls, clearly retaining the original position of the walls.
2.7	7	The cell block is preserved with this proposal with only later partitions removed which is welcome	Thank you

Item	Page	Hillingdon advice	Applicant response
2.8	7	the wall between the Inspector's office and charge room will be removed as well. On site the argument was made that the wall is later, the refused application had been specifically amended to retain this wall and without additional evidence to support its removal it should be retained.	The original building plans confirm that this wall was a later addition and the original arrangement had a separating wall between the two front rooms. It is proposed to restore the original wall and to take down the more recent partitions.
2.9	7	The removal of sections of wall between the baby room and corridor would erode the definition of the space, the doors are not original and it may be possible to widen the opening but it should be restricted to one and not both doorways.	Point noted. It is now proposed to only widen one door opening, while reopening a former doorway revealed by the original plan drawing. This leads to the creation of an additional store and a reduction in the size of the learning room with a resulting loss of capacity.
2.19	7	The first floor rooms have a far higher degree of partition removal than the ground floor and also from the previously refused application. There is real concern that the cumulative impact of removing so many partitions on the first floor, including original partitions is unacceptably high. It is recommended that this aspect of the proposal is revisited and as a bare minimum the original partitions are retained. Locating the original plans would also provide additional reassurance on the level of impact.	In order to retain the pattern of the planform while allowing for larger spaces needed by a nursery it is proposed to significantly reduce the extent of openings and to restrict these to arched openings between rooms that continue to display existing wall positions
2.11	8	the necessary adaptions for nursery use do require internal alterations that will impact the historic fabric and will detrimentally impact the original planform. It is considered that as currently proposed that the harm to historic fabric is too high and that the applicants should look at ways of mitigating this to reduce the impact. The harm is considered to be less than substantial but at a relatively high level requiring the proposal to be assessed against the public benefits of the scheme	
		Services	
2.12	7	The removal of suspended ceilings and existing service runs behind in order to restore the original dimensions of the Edwardian rooms can be supported. It is suggested that the impact of new services, vents etc. is considered with a full application rather than left to condition.	Confirmed The service runs are largely located in roof spaces, chimney flues and risers in store rooms and along with vent grilles are shown on the drawings MRN/P2/28 and MRN/P2/35-37
		General Repairs	
2.13	7	A proposed schedule of works for general works should be submitted with a future application.	A proposed Schedule of Room Works is included in the revised application
2.14	7	Repairs to the existing windows should include a detailed condition survey of the windows and a schedule of repair works solely for the windows.	A proposed Schedule of Conditions and Repairs to existing windows is included in the revised application

Item	Page	Hillingdon advice	Applicant response	
		The site		
2.15	7	<p>There will be play areas to the front. The garden setting is considered to contribute to the significance of the building. When first built the police station was designed to blend in with its domestic neighbours with their verdant front gardens. There is no in principle objection to play areas in these areas but there is concern that the grass would be replaced with hard surfacing for play which would detrimentally impact the setting. The design of these areas will need to be carefully considered and the garden character preserved.</p>	<p>The simple grassed areas at the front of the building will be replicated by plain areas of bi-coloured green rubber play surface. See schedule of landscape materials and planting.</p>	
2.16	7	<p>The rail on the front ramp will be replaced and safety panels installed below. This should be acceptable subject to the detail of the proposal.</p>	<p>The original plans reveal that the front path was original flanked by 'Oak fences 3'6" high'. To respect this it is proposed to replicate the oak fence along Murray and Maxwell roads up the path and against the ramp to the new external door to Year 2 Room 3.</p>	
2.17	7	<p>No objection to a new bike and buggy store to the rear again subject to detail.</p>	<p>Thank you</p>	
2.18	8	<p>It is really important that the existing fence to the front is retained and repaired. This is original and contributes both to the interest of the building as well as the character of the conservation area. Its repair should be included in the schedule of repairs.</p>	<p>It is intended to fully restore and repair the existing fence to the front, with the two sections required to be moved to allow for the widening of the vehicle access to the rear of the site turned by 90° to run alongside the driveway.</p>	
		Light, Lamp and Call box		
2.19	8	<p>These are curtilage listed features relating to the original function of the police station which it is proposed to repair and retain internally. While there is some understanding for the desire to retain them internally to avoid confusion, given their curtilage listed status they will need to be reinstated in their original position. Any alteration to their appearance such as the removal of the reference to 'police' would require consent. Any future application should include a schedule of repair works.</p>	<p>It is noted that the light, lamp and call box were not original features of the building. See photo taken in its original state – attached. Upon further and detailed consideration it is still proposed to conserve and relocate these still historic items inside the reception area to the new building. A schedule of repair works is included with the application.</p>	
2.20	8	<p>Particular concerns:</p> <ul style="list-style-type: none"> <li>• removal of wall between Inspector's office and charge room</li> <li>• high level of partition demolition on the first floor</li> <li>• creation of a doorway on front elevation from babyroom 1</li> <li>• impact of play areas to the front if the lawns are removed</li> </ul> <p>These aspects should be reconsidered in order to reduce the level of harm of the current proposal. The level of harm could be further mitigated with clearly articulated heritage gains to offset the level of harm.</p>	<p>See above</p>	

Item	Page	Hillingdon advice	Applicant response	
		Design: Character and Appearance – regarding proposed new access to Maxwell Road		
2.21	8	Removing a section of it [the fence] whether with this proposal or the proposal discussed at the meeting to create an opening onto Maxwell Road, would be directly harmful to the listed fence and impact the setting of the listed building. This would further contribute to the overall level of harm, which as my formal comments stated is considered at this stage to be too high. The fence also contributes to the character and appearance of the conservation area and this would be negatively impacted as well.	The tentatively suggested idea of a new access to Maxwell Road has not been pursued further and there is now no intention of creating a new opening in this location. The fence on Maxwell Road will remain intact and be fully restored.	
2.22	8-9	The tree contributes both to the setting of the listed building and the character and appearance of the conservation area. While removing it would be regrettable, on Murray Road there is a sufficiently long line of trees along the boundary of the Police Station that the removal of this one tree would not greatly impact the setting of the listed building or the character and appearance of the conservation area.	Confirmed	
2.23	9	In summary, there is a strong objection to removing sections of the listed fence while removing a tree, although regrettable would only have a limited impact on the heritage assets.	The section of fence adjacent to the widened entrance to the rear of the site and the tree will be swung round by 90° to form the side of the entrance area.	
<b>3.</b>	<b>9</b>	<b>Amenity of the area / Noise</b>		
3.1	9	The development being a change of use with a single storey front extension appears unlikely to impact on the amenity of the area. The proposed children's nursery use in proximity to residential dwellings is likely to raise concerns with neighbouring occupiers and could result in objections being received.  A children's nursery does have the potential to give rise to noise impacts, primarily due to children raising their voices and screaming during outdoor play time. The site plan indicates an outdoor space for children to play to the front and side garden of the building.	Agreed  Nursery age children in relatively small groups and with high levels of staff supervision do not generally cause any noise issues	
		From Council's noise specialist:		
3.2	9	'Given the nature and context of the proposed development apparent from the information provided I do not consider noise and vibration to be a material planning issue.'	Confirmed	

Item	Page	Hillingdon advice	Applicant response
3.3	9	Based on these comments, a Noise Impact Assessment is unlikely to be necessary for the upcoming planning application. During the meeting it was discussed and agreed that it would be beneficial for the purposes of allaying likely residents concerns that some sort of noise assessment should be fed into the Design and Access statement. It was understood that an initial noise survey had been undertaken.	Out of an abundance of caution a Noise Impact Assessment has been undertaken for the nursery by ACA Acoustics Ltd (ACA) and is included in the application documents. The findings are that: <ul style="list-style-type: none"> <li>the acoustic impact of the proposed external play space to the closest sensitive residential dwellings will be low.</li> <li>In addition, the calculated Rating Level from new external mechanical plant will not be detrimental to the amenity of nearby occupants.</li> <li>The site is suitable for the proposed development with no further noise mitigation measures necessary.</li> </ul>
3.4	9	it would be useful to understand how the garden area would be utilised i.e. would there be any play equipment/ furniture, along with details of the number of children that would be playing outdoors at any one time and during which hours of the day.	The garden areas will be used for small group educational play using small scale furniture and equipment brought outside for the purpose, especially for sand and water play. Children go outside in their class groups into their separately zoned areas, so the maximum number of children outside at any one time will be around 28 to 40 children. Play times are typically between 10.00am and 4.30 pm
3.5	9	Additionally, an Operational Management Plan is likely to be required if an application is supported (provided more detail on how the use would operate, number of kids/pick up times/ management of the use) thereby ensuring that the impact on the immediate area is minimised.	Effective and efficient operational management of the nursery is of great importance to the way the nursery will function. A proposed framework Operational Management Plan is included in the planning documents.
3.6	9	If appropriate, details of measures to minimise noise impacts on neighbouring residential amenity should be incorporated into the scheme. If considering acoustic fencing, this should be sensitively designed bearing in mind the setting of the listed building.	It is proposed to line the inside of the laurel bushes facing onto Murray and Maxwell Roads with a 1.8 m high acoustic fence stained to a pale forest green. The height will be lower than the bushes themselves and is, in any case, necessary for child safeguarding. The combination of fence and bushes will provide a very effective acoustic barrier to the nursery's external spaces
<b>4.</b>	<b>9</b>	<b>Highways: Safety and Parking</b>	
	10	Site Characteristics and Background	
4.1	10	Last year, an application for a change of use (CoU) to a place of worship combined with a community centre (46639/APP/2022/60) was refused on several grounds including a transport/highway reason based on a failure to fully demonstrate that the proposal would not give rise to an adverse impact to the highway network.	Traffic studies have been undertaken to monitor flows on the adjacent roads and the proposals include a traffic management plan to ensure that there will be no adverse impact on the highway network: <p>Proposed measures include:</p> <ul style="list-style-type: none"> <li>• A turning hammerhead for vehicles within the site</li> <li>• A buffer zone capable of holding up to four waiting vehicles within the site should no parking spaces be immediately available</li> <li>• Strict drop-off/pick-up policies with staggered times for arrivals, maximum 10 minute dwell times and charges for late pick-ups etc.</li> </ul> <p>These documents are included in the planning application pack</p>

Item	Page	Hillingdon advice	Applicant response
	10	Parking Provision/Vehicular Trip Generation/Car Park Layout/Staff Travel Plan	
4.2	11	There are no prescriptive standards (regional or otherwise) that can be applied but the local standard suggests that an individual 'site based' assessment should be undertaken by way of transport assessment and travel plan with provision of drop off & pick up facilities.	A transport assessment and travel plan is included in the application documents
		Vehicular Access Arrangements	
4.3	11	Evidence of 'swept path' analysis should be integral to any future submissions ... It is noted that such an exercise has already been presented.	Confirmed The swept path analysis has been updated along with the minor changes to the car park layout
4.4	11	the proposed adjustment to the internal roadway would involve the loss of a mature tree within the site envelope that lies in proximity of Murray Road itself. Although any tree loss is regrettable, from the HA's perspective, this is considered a necessary 'trade off' that would assist in achieving the benefits associated with the enhanced and effective vehicular and pedestrian 2-way 'thru-flow' within the envelope.	Confirmed
		Site-Line Requirement on Murray Road Access	
4.5	11-12	Satisfactory highway visibility splays at this established access point is also considered necessary and should be applied on pedestrian & vehicular safety grounds. There should be demonstrated conformity to the relevant mutual inter-visibility sight-line requirements, as per DfT (Manual for Streets (MfS) circa 2007) best practice for new development road and parking layouts guidance, between vehicles leaving the site and extraneous vehicles/pedestrians using the surrounding road network. It is therefore recommended that a lower height of frontage boundary treatment is applied in proximity of the access.	Drawings showing highways visibility splays in conformity with the Manual for Streets (MfS) requirements are included in the application documents

Item	Page	Hillingdon advice	Applicant response
		<b>Highways: Feasibility of Secondary Access on Maxwell Road</b>	
4.6	12	<p>The Highway Authority (HA) accepted the principle and possible benefit of the suggestion, however there would be further planning related implications with such a provision. Firstly, in terms of root disturbance, a row of several mature trees within the site curtilage on the boundary with Maxwell Road could be at threat. ...</p> <p>On balance, when taking all of the above considerations on board, the status quo should remain with a singular and established (but widened) vehicular access on Murray Road that would serve two-way vehicular traffic movement into and out of the site.</p>	This tentative idea is no longer proposed. The only vehicle and pedestrian entrance into the site will be via the widened existing entrance on Murray Road
		<b>Highways: Mitigations – Nursery Patron/Staff related</b>	
4.7	12	The enquirer should form a cogent response to a selection of their statements within the submitted documentation (as summarised below) and subsequent questions raised by the HA (highlighted in red) that follow:	Responses to these statements are provided in the Traffic Management Plan submitted with the application and include:
4.7.1		a) how would a future applicant best ensure that parents/guardians adhere to any pre-arranged time? Would there be any practical incentives (or alternative solutions) to do so?	As with the great majority of nurseries drop-off and pick-up times will be rigorously monitored and charges applied if they are not adhered to. This is critical for staffing arrangements as well as traffic management
4.7.2	13	Also, to what degree would the surrounding and immediate roadways be impacted in the event of the above 'worst- case' scenario coming to fruition? This should be profiled accordingly.	A number of measures have been implemented to ensure that this is not an issue – see item 4.1 above
4.7.3	13	b) How would this anticipated turnover period be properly managed to ensure the above dwell time-lines are achieved?	See 4.7.1 above
4.7.4	13	c) How many pupils are anticipated to attend for only half a day (am or pm)? If sizable in number, this would clearly influence the level of impact on nearby roadways during the most crucial morning and afternoon peak traffic periods. Relevant detail is therefore required.	Experience in other local nurseries suggest that only a small proportion of children (between 4 and 18%) do half day sessions. This will not have any material impact on the traffic flows

Item	Page	Hillingdon advice	Applicant response
4.7.5	13	<p>It is clear that if the on-plot provisions are, for whatever reason, inaccessible i.e. are already at operational capacity or affected by other limitations</p> <p>Alternative options:</p> <p>2nd - on-street provision as close to the address as possible such as parking on the single yellow lines or within the residents parking bays (where available) in Murray Road that operate for only one hour of the day (1pm to 2pm) in proximity of the address</p> <p>3rd - the nearby Waitrose car park in Murray Road with a '2 - hour maximum stay for customers' ... it is accepted that, in reality, this facility [the Waitrose car park opposite] is physically available for use as a parking option.</p> <p>4th - Maxwell Road as this is covered by daily restrictions operating from 8am to 6.30pm although 'Pay &amp; Display' parking could be a 'paid for' option if available.</p> <p>5th - and more distant option would be to utilise Green Lane or Northwood Station car parks at cost but as they lie some 300m + away from the site, they are far less convenient and therefore highly unlikely to be utilised by the majority of patrons.</p>	<p>Thank you for this detail, which has been incorporated into the Traffic Management Plan</p>
		Staff	
4.8	14	The HA therefore considers that parking demand generated by staff is unlikely to impose a notable impact on the local roadways given the presence of surrounding CPZ's. ... any relatively short-term demand by a proportion of staff whether during the morning or afternoon does not give rise for specific concern or a basis for an objection at this stage.	Confirmed
4.9	14	It is also considered that any resultant proportion of traffic generated by staff who do not travel by sustainable means would be likely to be well dispersed on the highway network given the established parking constraints of the locality and therefore can therefore be readily absorbed within the local road network without notable detriment to traffic congestion and road safety.	Confirmed

Item	Page	Hillingdon advice	Applicant response
4.10	14	As a safeguard, a framework staff travel plan (STP) would further assist in shoring up a more sustainable approach to travelling to and from the site which is submitted in draft form. The STP is considered as a useful and key tool in this respect and the submission incorporates sound aims such as general promotion, staff car sharing/'lift home' provisions, on-site cycle parking etc. In line with established guidance afforded by Transport for London (TfL), a finalised and formal TP would be a requirement and will need to be secured within a future submission or via planning condition. This will allow for a review mechanism in years 1, 3 and 5 following site occupation which will help ensure compliance to the sustainable travel mode 'SMART' targets as agreed with the local authority	A framework staff travel (STP) plan is included in the overall Traffic Management Plan  The nursery looks forward to providing a finalised and formal STP in due course in accordance with the planning condition and for it to be reviewed in Years 1, 3 and 5 following occupation of the site.
		Highways: Safeguarding	
4.11	14	To ensure the successful and compliant operation of the site use in the event of a recommendation for a future grant of permission	
4.11.1	14	1) Parking Management Review – A financial bond of £10,000 toward consideration of reviewing and potentially amending the existing neighbouring Controlled Parking Zones (CPZ's) if consistent and undue parking displacement onto the public highway linked to the proposal is identified with any residual/unused monies being returned by-way of the above legal mechanism within a mutually agreed timescale.	Noted

Item	Page	Hillingdon advice	Applicant response
4.11.2	14-15	2) Car Parking Management Strategy (CPMS) – On the premise of best controlling the profile of parking usage within and outside the site envelope, it is considered that the application of CPMS is a key tool which helps to ensure an unhindered and functional operation for the proposed use. This would involve creating an internal site management regime that would enforce and oversee overall parking control on a site-wide basis thus ensuring the harmonious and mutual coexistence/interplay of parking bay allocations for all users. The CPMS can be supported by enforcement structures which encourage the correct use of parking places which assists in ensuring that parking demand and allocation is properly managed. It should clearly set out the methodology behind the control of parking place turnover/dwell times in order to secure an appropriate level of parking provision for all users. Achieving a functioning CPMS is therefore crucial as otherwise potential operational conflict could arise for 'whole site' operation leading to undue injudicious parking and/or excessive queuing within the site envelope with subsequent spillage onto the highway network which clearly should be avoided.	The CPMS and Traffic Management Plan are of a piece and are considered together
4.11.3	15	3) Capping of Attendance Numbers – The projected attendance figure should be capped to a stated limit which is proven to be manageable. All effort should be made to apply measures such as avoidance of multiple arrivals/departures at any one time that would inherently reduce concentrated intensity on the locality at a given period. This would afford some comfort to the HA and local community in terms of constraining any undue increase of intensity of the site use which may otherwise cause burden to the local highway network. The aforementioned CPMS would be expected to contribute to this aim.	The proposed attendance numbers have been reduced slightly – to 114 – owing to internal plan modifications. These relate to the requirements of the Early years foundation stage (EYFS) statutory framework.
4.12	15	For the quantum of proposed on-plot parking, the provision of 1 disabled compliant bay is to standard and therefore considered acceptable.	Confirmed

Item	Page	Hillingdon advice	Applicant response
4.13	15	In accord with the Local Plan: Part 2 DMT 6 policy and parking standard, there is a requirement for EVCPs which would equate to a minimum facility of 5% of the total parking quantum for 'active' provision with a further 5% acting as 'passive' provision for future activation.	2 no. EVCP stations (18% of the total parking quantum) will be provided in the positions marked on the site plan. Future further provision will also be enabled.
4.14	15	the regional London Plan (2021) cycle standard should be applied with a provision of 1 secure & accessible per 8 FTE staff attending at any one time.	With 24 staff this indicates a minimum provision of 3 secure and accessible spaces. 4+ spaces will be provided in the bike and buggy shed. Overall this will have approximately 20 combined spaces.
4.15	15	General servicing and refuse arrangements and collection is likely to be organised by way of a private contractor hence this will require a separate conversation with the appropriate private waste collection service. There are no further observations.	A waste store is to be provided in the car park and collection will be arranged with a private service as noted.
4.16	15	the acceptability (or otherwise) of a future planning application will be dependent on the evidence and detail provided within the submitted documentation together with an appropriate response to the comments and recommendations made within this appraisal which should not be considered as exhaustive	Acknowledged
<b>5.</b>	<b>15</b>	<b>Trees and Landscaping</b>	
5.1	16	There is a row of 16 mature London plane trees along the Murray Road and Maxwell Road boundaries. The trees historically have been managed as pollarded specimens. This distinctive form of management needs to be carried out on a regular/ cyclical basis. They contribute a distinctive landscape feature at this site and contribute to the character and appearance of the Conservation Area.	An Arboricultural Impact Assessment and Method Statement has been provided by Abbots Arboricultural Advice (AAA). This is included in the application documents  As advised the plane trees will need to be re-pollarded to around 6 m (the most recent pruning point) to re-initiate the lapsed management regime.
5.2	16	Full details of soft and hard landscaping and any replacement boundary fencing/enclosures would need to be submitted. The site plan indicates the removal of trees and the retention of trees within the site.	A landscape plan and schedule of landscape elements are included with the application
5.3	16	A tree survey should be submitted to identify the quality of trees and to set out tree protection measures and an arboricultural method.	A tree survey has been carried out by Abbots Arboricultural Advice (AAA). This is included in the application documents
5.4	16	any future application should aim to be preserving the feeling of a garden setting in front of the police station. Any redesign should be kept simple and low key in natural colours.	The design of the front gardens has maintained the simple front garden setting of the building with low key features and natural colours.

Item	Page	Hillingdon advice	Applicant response
5.5	16	There is no objection in principle to the idea of a boundary fence behind the laurel however a closed boarded fence would be too solid thereby impacting on the setting. Some sort of mesh fence in a green colour that visually recedes into the laurel hedging would work better.	It is proposed to install an acoustic fence at the back of the laurel hedge – see item 3.6 above. But it is also critical to have a non permeable fence around the play areas to safeguard children, both for their security and privacy from anyone who may climb through the laurel, but also to prevent hands etc. getting caught or harmed.
5.6	16	The removal of trees to accommodate a new access would not be supported. The line of trees forms part the street scene and the loss of trees would be harmful to the visual amenity of the site. The trees appear to be well established and healthy mature trees and would be protected under the provisions of the conservation area designation.	No new access is now being proposed.  A widening of the existing entrance is envisaged, resulting in the need to remove one London plane tree – see item 2.22 above
Space Standards			
5.7	16	The useable floor area totals 233sq.metres which comprises 122sq.metres on the ground floor and 111sq.metres on the first floor. The submission indicates that the nursery would accommodate up to 117 children between the ages of 6months and 5 years.  Any future submission should clearly document how the calculation of children numbers has been reached. It would be likely that in the event of an approval, a condition would be attached to define children numbers and this would be based on the number of children that the building could accommodate, having regard to Ofsted's indoor space requirements.	The useable floor area of the existing building is 560m <sup>2</sup> With demolition of the existing plant room and construction of the new reception area this becomes 629m <sup>2</sup> The learning rooms have a combined floor area of 302.8m <sup>2</sup> , which will accommodate 114 children in accordance with the requirements of the EYFS (and Ofsted). This is further laid out in the Design and Access statement
Outdoor Play Space			
5.8	17	The scheme would therefore provide a good standard of useable outdoor play space for use by children.	Confirmed
Access			
5.9	18	Conclusion: no accessibility issues are raised, subject to the following informative attached to any approval: The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people. Any formal planning application submission should address the points raised above.	The design for the nursery layout as shown in the application addresses issues of ensuring maximum accessibility in a multi-level listed building

Item	Page	Hillingdon advice	Applicant response	
		Air Quality		
5.10	18	<p>As per the London Plan, developments need to be air quality neutral as minimum. In addition, LBH requires new developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution.</p> <p>Further, mitigation level by proposed development which pollutant emissions will affect areas of poor air quality (i.e. either within or in the catchment area of LBH Focus Areas) is to be determined on total emissions using Defra's damage cost approach.</p>	<p>An air quality assessment has been carried out by the <b>Aval Consulting Group</b></p> <p>The assessment is including in the documents in the planning application.</p>	
5.11	18	<p>An Air quality neutral assessment with appropriate mitigation needs to be provided. The reduction of emissions to be achieved by each measure to be proposed needs to be quantified or a flat rate discount agreed with the LPA.</p> <p>During the meeting a query was raised regarding the air quality requirement. The Council's Air Quality officer has confirmed that it would be an air quality neutral assessment (not positive) that would be required in this instance and the total emissions (not the uplift) will apply.</p>	See above	
	18	Crime Prevention		
5.12	19	<p>Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles.</p> <p>Where relevant, these should be included in the Design and Access Statement. Development will be required to comprise good design and create inclusive environments whilst improving safety and security by incorporating the following specific measures:</p> <ul style="list-style-type: none"> <li>i) providing entrances in visible, safe and accessible locations;</li> <li>ii) maximising natural surveillance;</li> <li>iii) ensuring adequate defensible space is provided;</li> <li>iv) providing clear delineations between public and private spaces; and</li> <li>v) providing appropriate lighting and CCTV.</li> </ul>	The design encompasses these five requirements and these are demonstrated in the drawings and Design and Access Statement in the application.	

Item	Page	Hillingdon advice	Applicant response	
5.13		Any grant of planning permission would be subject to a secure by design condition to achieve appropriate accreditation. To obtain further advice, you may wish to contact the Metropolitan Police's Secure by Design Officer, PC Robert Palin who can be contacted on 020 8733 5245 or by e-mail on Robert.Palin@met.pnn.police.uk	Noted	
		<b>Fire safety</b>		
19		applicants are encouraged to consider fire safety early within the development process.	Fire safety has been fully considered in the design development process	
<b>6.</b>		<b>Planning Obligations and CIL (Mayor and LBH)</b>		
	19	The development would not be CIL liable. Based on the circumstances of the proposed development, it is likely that the following would be secured by a Section 106 legal agreement: <ul style="list-style-type: none"> <li>i) Travel Plan: A full Travel Plan shall be submitted to and approved in writing by the Local Planning Authority. The Plan will include such matters as: targets for sustainable travel arrangements; effective measures for the ongoing monitoring of the Travel Plan; and a commitment to delivering the Travel Plan objectives.</li> <li>ii) Air quality neutral contribution.</li> <li>iii) Project Management &amp; Monitoring Fee: A financial contribution equal to 5% of the total cash contributions.</li> </ul>	Confirmed	
<b>8.</b>		<b>Conclusion</b>		
	20	The proposed community use is supported in principle by national, regional and local planning policy.	Thank you	
	20	It is requested that the relevant parts of the Metropolitan Police Estates Strategy is submitted to support any forthcoming planning application. A letter of support from the Metropolitan Police Service would also be beneficial.	Reports provided by the Metropolitan Police will be provided. Unfortunately they have stated that they are not able to comment on the specifics of the proposed application.	
	20	From a conservation perspective, as set out in the 'Design' section, there are concerns raised regarding the harm to the historic fabric of the listed building owing to the overall scale of the various elements being proposed. The harm would be categorised as 'less than substantial harm' at the very least. Any forthcoming planning submission would need to amend the proposals accordingly.	The extent of changes resulting from the proposals have been reduced significantly and those alterations remaining will cause 'less than substantial harm' while providing a new and beneficial long-term use for the building not only allowing it to be repaired and refurbished but also giving it a viable future	

Item	Page	Hillingdon advice	Applicant response
	20	Aside from the above, the impact on neighbouring residents with respect to noise is a primary concern. Any forthcoming planning submission should be supported by details of measures to minimise noise impacts on neighbouring residential amenity. Any noise mitigation measures should also be sensitive to the setting and historic fabric of the Grade II Listed Building.	The Council's noise specialist judged that 'I do not consider noise and vibration to be a material planning issue.' Noise measures have been proposed to ensure that impacts on neighbours are minimal. This has been supported by an independent acoustic impact assessment – see item 3.3 above
	20	The impact on the local highways network is also a notable consideration. A similar application at 16 Murray Road was refused under ref: 4626/APP/2019/629 and one of the reasons for refusal related to the lack of adequate onsite car parking, on-site pickup and drop off facilities to the detriment of child safety and increase in parking stress (condition 7). As detailed in the highways and parking section of this response, additional information and clarification is required.	The transport assessment and travel plan addresses these issues
	20-21	The successful implementation of a robust Travel Plan will be a necessary requirement, requiring that it is secured by a Section 106 legal agreement. The proposed new access of Maxwell Road is not likely to be supported as there are wider implications that would weigh significantly against the site specific vehicle transit benefits.	The Framework Travel Plan is part of the application. No new access from Maxwell Road is currently proposed
	21	An air quality neutral assessment would be required. Any air quality contribution would be secured through a Section 106 legal agreement.	An AQA is included in the application materials
	21	The issues outlined above should be addressed before the proposal can be supported. The formal application submission should also be supported by the documentation requested within the main body of the report to aid the detailed consideration of the application.	Noted