



## PLANNING, DESIGN AND ACCESS STATEMENT

CORNER OF FORE STREET AND HIGH ROAD, EASTCOTE, PINNER HA5 2ET

Full planning permission for the erection of a new nursery (childcare) building  
on the corner of Fore Street and High Road, Eastcote.

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## 1. INTRODUCTION & DOCUMENTS

- 1.1. This Planning, Design and Access Statement has been prepared in support of an application for planning permission for the erection of a new nursery (childcare) building on the corner of Fore Street and High Road, Eastcote.
- 1.2. This application follows pre-application advice with the Council and adopts all recommendations and feedback, wherever possible.
- 1.3. **Figure 1** below shows the application site edged red.



**Figure 1: site location plan**

1.4. The documents supporting this revised application comprise:

- Planning application forms and certificates
- CIL Form
- Correct fee of £2804.20
- The following supporting reports:
  - Planning, Design and Access Statement
  - Heritage Statement prepared by David Hickie, includes archaeology.
  - Flood report
  - Sustainable drainage report
  - Sequential test
  - Ecology report
  - Biodiversity net gain assessment
  - Landscape masterplan
  - Transport report
  - Air quality
  - Arboricultural report

## 2. THE PROPOSAL

- 2.1. Full planning permission is sought for the erection of a new nursery (childcare) building on the corner of Fore Street and High Road, Eastcote.
- 2.2. The proposal is for a single storey sustainable building designed to the highest standard, with the wider scheme providing net biodiversity, ecology and arboricultural gain. The proposal includes an intensive green roof, biodiversity enhancements, new tree planting and landscaping to the whole of the site. It is designed to the highest standard of sustainability and will be a no dig scheme. The proposal is supported by detailed ecology, arboricultural, landscaping and heritage reports.
- 2.3. The nursery will provide childcare for up to a max capacity of 80 children between 8am and 6pm. There will be half and full days available therefore it is very unlikely all children will attend on the same day at the same time. The nursery will operate staggered collection times.
- 2.4. The nursery is to be a single storey structure with a green roof and timber cladding building. The structure is 28 metres by 16 metres (GIA 422 sqm), surrounded by fenced play areas. The trees to the rear are to be retained as a woodland education area with ecological enhancement measures proposed.
- 2.5. The proposal provides an idyllic early years' nursery in a biodiverse setting. The proposal is a unique development offering a beautiful environment to begin the children's lives whilst enhancing biodiversity and preserving the quality of the trees surrounding the development for the future. The proposal is a no dig (no foundation) development so is easily removable once the building life has finished to serve its purpose. The vegetation surrounding the site is dense and will be maintained so that only glimpses of this single storey green roofed, wood clad development would be seen from the wider streetscene. The existing site currently attracts anti-social behaviour including arson. The proposal will benefit the local area greatly and turn this unused, unallocated plot of land into a cared for green space, with a rich landscaping scheme and an educational facility which Hillingdon can be proud of providing for its children.

## **SITE AND SURROUNDINGS**

2.6. The site is a vacant site situated on the corner of Fore Street and High Road, Eastcote. It lies behind a small area of public open space and is bound by the river Pinn to the northwest and the petrol station at Eastcote to the northeast. The site perimeter contains multiple TPO trees and vegetation which screen the site from public view. The site is private land and has never been in public use. Ordnance survey maps show there was once a structure on the site (believed to be timber) which sold fruit and vegetables. The site area is predominantly residential in character, with the exception of a small local shopping parade located approximately 150m northeast along the high road, a petrol station and the Black Horse Public House (Grade II listed).

2.7. The application site is designated as part of the Eastcote Village Conservation Area and the Eastcote Village Archaeological Priority Area. The site is bounded to the north by the River Pinn and lies predominantly within Flood Zones 1, 2 and 3 along the River Pinns bank. The site is covered by 17 Tree Preservation Orders (TPO) and the Eastcote Village Air Quality Focus Area. The land on the opposite side of the river to the north, is designated as Green Chain Land.

## **3. MATERIAL PLANNING HISTORY**

3.1. There are no planning permissions relating to the site. There was one withdrawn application for a residential scheme comprising the creation of 2 new detached dwellings, new access, landscaping and tree planting (Ref:73450/APP/2019/1272). It is understood that further information was required regarding flood risk and accordingly this application was withdrawn.

## **4. PRE-APPLICATION ADVICE**

4.1. NPPF paragraphs 39 encourages early pre-application engagement to improve the efficiency and effectiveness of the planning application system for all parties. Pre-application advice was obtained prior to the submission of this application. The pre-application advice raised various issues for consideration, and had 2 main concerns in respect of flood risk and impact on the

Conservation Area. Accordingly, these issues have been addressed in depth by relevant professionals in each respect and this report comments on these aspects accordingly.

## 5. PLANNING POLICY FRAMEWORK – IDENTIFICATION

5.1. This section provides the national and local planning policy context relevant to the determination of the application.

### **Planning and Compulsory Purchase Act 2004**

- Section 38(6) requires applications for planning permission to be determined in accordance with the development plan unless material considerations indicate otherwise.

### **National Planning Framework (Feb 2021)**

- Chapter 6 – Building a strong competitive economy
- Chapter 8 – Promoting healthy and safe communities
- Chapter 9 – Promoting sustainable transport
- Chapter 11 Making effective use of land
- Chapter 12 – Achieving well-designed places
- Chapter 15 – Conserving and enhancing the natural environment
- Chapter 16 - Conserving and Enhancing the historic environment
- Planning (Listed Buildings and Conservation Areas) Act 1990

### **Hillingdon's Local Plan**

- The Local Plan: Part 1 - Strategic Policies (2012)
- The Local Plan: Part 2 - Development Management Policies (2020) The Local Plan: Part 2 - Site Allocations and Designations (2020)
- The West London Waste Plan (2015)

## **Part 1 Policies**

- PT1.BE1 2012 Built Environment
- PT1.EM2 2012 Green Belt, Metropolitan Open Land and Green Chains
- PT1.EM6 2012 Flood Risk Management
- PT1.EM7 2012 Biodiversity and Geological Conservation
- PT1.HE1 Heritage

## **Part 2 Policies**

- DMCI 1A Development of New Education Floorspace
- DMCI 2 New Community Infrastructure
- DMEI 10 Water Management, Efficiency and Quality
- DMEI 14 Air Quality
- DMEI 7 Biodiversity Protection and Enhancement
- DMEI 8 Waterside Development
- DMEI 9 Management of Flood Risk
- DMHB 1 Heritage Assets
- DMHB 11 Design of New Development
- DMHB 12 Streets and Public Realm
- DMHB 14 Trees and Landscaping
- DMHB 4 Conservation Areas
- DMHB 7 Archaeological Priority Areas and Archaeological Priority Zones
- DMT 5 Pedestrians and Cyclists
- DMT 6 Vehicle Parking

## **London Plan 2021**

- Policy D1 - London's form, character and capacity for growth
- Policy GG2 - Making the best use of land
- D3 (2021) Optimising site capacity through the design-led approach

- D4(2021) Delivering good design
- D5 (2021) Inclusive design
- D8(2021) Public realm
- G6(2021) Biodiversity and access to nature
- G7(2021) Trees and woodlands
- HC1(2021) Heritage conservation and growth
- S1(2021) Developing London's social infrastructure
- S3(2021) Education and childcare facilities
- S112(2021) Flood risk management
- S113(2021) Sustainable drainage
- SI2(2021) Minimising greenhouse gas emissions
- T4 (2021) Assessing and mitigating transport impacts
- T5 (2021) Cycling
- T6 (2021) Car parking
- Policy GG2 - Making the best use of land

## 6. PLANNING CONSIDERATIONS

6.1. The pre-application advice identifies the following material planning considerations and accordingly the items will be discussed in this order:

- Principle of development
- Heritage and Design
- Trees
- Biodiversity
- Landscaping
- Delivering neighbourly development
- Inclusive design
- Highways and Parking
- Cycle store
- Flood risk and Suds
- Refuse storage
- Energy
- Air Quality
- Community Infrastructure Levy

### **Principle of Development**

6.2. Planning permission is sought for a nursery providing childcare to serve the local community. London Plan policy S3 seeks boroughs to ensure "*there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice*". Hillingdon's Local Plan describes the "*impact of the birth rate changes is now working through the primary age groups and is due to impact upon the secondary age group from September 2016. The number of pupils needing specialist educational provision is increasing. Whilst birth rate increases are the major driver of demand, other changes (eg. Migration into the borough) increases demand for places across all year groups (including nursery). In addition, local authorities now have a duty to secure early years provision for the least advantaged two-year-*

*olds*". Hillingdon's Local Plan was published in 2020, presumably constructed on pre-2020 evidence. There is an increasing demand for nursery spaces and the borough has a duty to provide appropriate provision for the future.

6.3. Hillingdon's Local Plan does not specifically have policies relating to nurseries but does have policies relating to new education floorspace and also to new community facilities. Policy DMCI 1A Development of New Education Floorspace states proposals for new schools and school expansions will be assessed against the following criteria:

*6.4. A) The size of the site, its location and suitability to accommodate a new school or school expansion taking account of compatibility with surrounding uses, and existing planning policy designations (e.g. conservation areas, MOL, Green Belt).*

6.5. The proposal is for a nursery and not comparable to the scale of a primary and secondary school. The proposal is situated within the community it intends to serve, and it is appropriate to situate nurseries within residential areas so parents can be easily accessible to their children from their homes. The site is situated within a developed area of the borough where development is considered appropriate subject to compatibility with other relevant policies.

*6.6. B) The impact on green open space, games pitches, outdoor play and amenity space, taking account of the character of the area, whether the site is within an area of open space deficiency and whether the school has sufficient outdoor space for play and games.*

6.7. The proposal preserves and enhances the green character of the area, with the protection of the dense hedges and trees surrounding the site, the new tree planting scheme and also a biodiversity enhancement project. The sustainable single storey nursery preserves the trees on the site and utilises the secluded location as part of the amenity for the nursery. The proposal brings back into use a small plot of land, which is private land, and was once attached to the petrol station. The proposal provides public benefit to the local community, through making this site accessible to the community and great effort has been made to enhance the ecological and aboricultural value of the land. The quality of a nursery set amongst the existing

trees and diverse landscaping scheme would provide an excellent educational provision for the borough. The pre-application report suggests from a brief desktop search that 4 nurseries provide an abundance of childcare provision operating already. This is not the case unfortunately. Some of these are very small providers, only supporting up to 20 children. The Applicant maintains there is a strong increasing demand, particularly for nurseries which can provide outdoor learning and play in a 'forest school' type settings, such as is the case here. It is maintained that local authorities should take opportunities to be proactive rather than reactionary in provision for education and childcare.

*6.8. C) The location and accessibility of the site in relation to: i) the intended catchment area of the school; ii) public transport; and iii) the local highway network and its ability to accommodate new or additional school trips without adverse impact on highway safety and convenient walking and cycling routes to schools.*

6.9. The nursery is to be highly accessible to its customers from the local area and the catchment for staff and families using the facility will be local to the site. There is a full transport report which supports this application to demonstrate that there will be no adverse impact on highway safety and convenient walking and cycling to nursery.

*6.10. D) The extent to which the building design contributes towards the government target that schools and colleges should be zero carbon from 2016.*

6.11. The building is to be zero carbon and designed to the highest standard of energy efficiency and sustainability.

6.12. A day nursery does provide a service of benefit to the community and therefore compliance with DCMC1 2 is also demonstrated. DMCI 2 New Community Infrastructure B) states "*Proposals for the provision of new community facilities will be supported where they:*

- i) are located within the community or catchment that they are intended to serve;*
- ii) provide buildings that are inclusive, accessible, flexible and which provide design and space standards that meet the needs of intended occupants;*

6.13. The proposal is located in the community and catchment it is intended to serve. The building is inclusive, accessible, flexible and single storey. The proposal has public benefit providing a community facility providing much needed childcare provision. Biodiversity net gains and early education provision. A nursery use has benefits to the economy allowing parents to work and also providing 25 new local jobs in the area.

#### **Achieving a High Quality of Urban Design/Protecting heritage**

6.14. Section 72 of the Listed Buildings and Conservation Areas Act 1990 states that “special attention shall be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.”

6.15. Chapter 16 of the NPPF also makes it clear that when considering planning applications, local authorities should give great weight to a heritage assets conservation. Any harm should be weighed against the public benefits of the proposal including where appropriate securing its optimum viable use.

6.16. Paragraph 127 of the National Planning Policy Framework (as amended) states that developments should be visually attractive because of good architecture, layout, and appropriate and effective landscaping. Developments should also be sympathetic to local character and history, including the surrounding built environment and landscape setting.

6.17. Policy D3 of the London Plan states that development proposals should be of high quality, enhancing local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance, and shape, with due regard to existing and emerging street hierarchy, building types, forms, and proportions.

6.18. Policy BE1 of the Hillingdon Local Plan (November 2012) requires that all new development achieves a 'high quality of design in all new buildings, alterations and extensions'.

6.19. Policy DMHB 4 of the Hillingdon Local Plan: Part Two - Development Management Policies (2020) advises that all new development, including alterations and extensions to existing

buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area.

6.20. A Heritage Report prepared by David Hickie, who is a national expert in the field of heritage management and planning, is submitted as part of this application. The report outlines the key heritage assets:

6.21. **Nearby Listed Buildings:** The site does not directly contribute to the settings of the nearby Grade II listed New Cottages and Flag Cottage.

6.22. **Nearby non-designated Heritage Assets:** There are no locally listed buildings in the immediate vicinity. However, the adjacent public open space known as 'Pretty Corner' is a heritage asset of local low value. However, the site makes no direct contribution to the heritage significance of this heritage asset.

6.23. **Eastcote Village Conservation Area:** The current green space does contribute to the semi-rural character of the western part of the Conservation Area. However, it is the hedges and mature trees or key features that directly contribute not the semi-rural character and not the private open space within the site – which is hardly visible from the public street-scene. Overall, the character of the area is that of a high-quality suburb dominated by open spaces, extensive natural landscaping and trees.

6.24. **Eastcote Village Archaeological Priority Area (APA):** The APA is a Tier 2 APA as defined by the 'Greater London Archaeological Priority Area Guidelines' (2016). The site makes no known contribution to this designation.

6.25. The Heritage Report submitted summarises in paragraph 5.3:

"In summary, despite construction of the new single-story building on this site, the proposals will not adversely affect the heritage assets in the locality.

6.26. The key heritage issues in questions are:

**6.27. “a) Will the proposed works adversely affect nearby Grade II listed buildings or their settings?**

6.28. This assessment shows that the proposals will not adversely affect the listed buildings or their settings. The site does not contribute these settings.

**b) Will the proposed works adversely affect nearby non designated heritage assets?**

6.29. This assessment shows that the proposals will not adversely affect any such non-designated heritage assets or their settings. The site does not contribute these settings.

**c) Will the proposed works adversely affect the character and appearance of the Eastcote Village Conservation Area?**

6.30. There will be no significant change to the overall character of the area which is that of a high quality suburb dominated by open spaces, extensive natural landscaping and trees. No changes will be visible from the street-scene (with the exception of the new entrance replacing the existing harmful hoardings currently in the access location). The appearance of the conservation area will not be adversely affected. The access gateway will be tidied up and improved and the surrounding hedgerow will be improved. The public and passers-by will have little or no perception that the Nursery is on this site. The majority of the site will retain its open character and there will be no significant change in character of area: still retaining the character of a high-quality suburb dominated by open spaces, extensive natural landscaping and trees. The new landscaping proposals will be beneficial to the character and appearance of the conservation area. Overall, this will be a slight beneficial change to the character and appearance of the conservation area.

**d) Will the proposed works adversely affect the Eastcote Village Archaeological Priority Area?**

6.31. The ‘no-dig’ foundations will carefully minimise any disturbance to potential archaeology across the site. There will be no harm to this Tier 2 APA.”

6.32. Therefore, the proposals do not directly conflict with any local or national heritage policies.

6.33. The extensive biodiversity project and new tree planting has great benefit to enhance the character of the area. The public will have no perception that there is a nursery on the site and therefore the proposal would preserve the character of the area. The site was formerly part of the adjacent petrol station and once had a timber structure selling fruit and vegetables, which is still illustrated on ordnance survey maps. It has always been in private ownership and is not designated as Green Belt, nor as Green Chain or similar. The Green Chain designation only relates to north of the site and if this site was felt to be of green value to the borough, then it would have been included on the proposals map along with the other side of the riverbank. The pre-application advice objected on principle due to the loss of open, verdant character, but it is clear that the dense trees and shrubbery - even in winter, ensure that the site is not open in appearance and not publicly accessible or visible. The trees are protected by way of 17 TPOs, many of which relate to groups of trees. Conditioning the landscaping scheme which provides many more shrubs, trees and plants within the sites central areas also ensures the thick density of trees is maintained and enhanced. The intensive green roof will add to this effect.

6.34. The proposals have taken on board the pre-application feedback and ensured the proposal enhances the character of the area and provides a use for an empty plot of land which strengthens the biodiversity, and ecological and visual amenity of the area. The proposal is considered to complement the varied character of the high-quality suburb, preserving the extensive natural landscaping and trees on site, in accordance with the Conservation Area goals. It is maintained the proposal has been carefully designed to provide a use which is an asset to the Conservation Area and an exemplary eco development.

## **Trees**

6.35. Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020) also require that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should enhance amenity, biodiversity and green infrastructure.

6.36. A full arboricultural and landscaping report is submitted which demonstrates TPO trees are not affected in anyway and ensure as many trees and vegetation are retained as possible. The building has been carefully positioned away from any tree protection zones.

6.37. A full arboricultural report and landscaping scheme is submitted as part of this application. There are currently some trees of modest to high value on site, most of which are B and C category trees and will be protected as per their location in a Conservation Area and 17 by Tree Preservation Orders. Only dangerous trees are being removed and many new hedges, shrubs and trees are proposed as part of the landscaping scheme. The arboricultural report concludes in paragraph 9.4 overall *“subject to appropriate controls, the development can be implemented without undue impact on retained trees. These should be detailed within the APMS that should be submitted to and agreed in writing by the Local Planning Authority prior to the commencement of the development”*. The landscaping and ecology proposed ensures the development harmonises within the local context, biodiversity and green infrastructure and fully complies with policy DMHB11 and DMHB 14 of the Hillingdon Local Plan.

## **Biodiversity**

6.38. An ecology report is submitted as part of this application the report details:

6.39. “The proposed scheme is primarily focussed in areas of low ecological value, including bare ground, scattered scrub and tall ruderal. The higher ecological value habitats, including hedgerow, mature trees, deadwood and dry ditches are being retained and/or enhanced as part of the proposals, with the exception of a small section of hedgerow in the south and ten yew trees, all of which are due to health and safety concerns”

6.40. The Biodiversity Net Gain Assessment is also submitted as part of this application. The majority of habitats with higher ecological value will be retained within the site, including the tree line in the north and hedgerow in the south, which will be enhanced. The proposals include the loss of tall ruderal and bare ground, with small areas of scrub being lost in the east.

6.41. Habitats created include a large, vegetated garden, introduced shrub habitat, amenity grassland, urban trees, an intensive green roof and hard standing / permeable paving. 0.125km of native species-rich hedgerow will also be created within the site.

6.42. The outcome of the BNG assessment is:

- A net gain of 0.24 habitat units which is an increase of 13.96% from the baseline units.
- A net gain of 1.37 hedgerow units which is an increase of 135.33% from the baseline units.

Full findings of the assessment can be found in Chapter 5 of the BNG assessment.

6.43. Overall, there is a significant net gain for the proposal, given the small area of the development. The proposals include appropriate habitats within the site, which are similar to those within the wider area, and provide ecological connectivity through the site.

6.44. Additional significant gains for ecology that are not captured within the Defra 3.1 Metric are species specific enhancements, including four invertebrate habitats such as log piles, one hedgehog hibernaculum, six bird boxes and six bat boxes which will enhance the site and wider environment for protected and notable species”.

6.45. This significant gain in biodiversity of the site, along with the extensive tree planting and landscaping is of great benefit to the local area.

## **Landscaping**

6.46. A detailed landscaping scheme is submitted as part of this application which includes 350sqm of play space with quality timber equipment. Play surfacing will be a rubber matting through which the grass can grow. There is a 'woodland walk' accessed through the children's play area with a meandering woodchip that leads to a 'storytelling circle' with mushroom shaped stools. The flora is enhanced with shade tolerant perennials, wildflower seed and drifts of springtime bulbs, such as aconite, snowdrops and wood anemone.

6.47. The Biodiversity Net Gain is significant via the introduction of various nectar rich trees, shrubs and perennials; including oak, rowan, wild cherry, hornbeam, crab apple and crimson hawthorn. Mixed native hedging borders the frontage of High Road Eastcote, whilst hornbeam frames the building.

6.48. Working in conjunction with ecologists from Land Use Consultants Ltd. (LUC), ecological enhancements have been included wherever practicable, including; bat boxes, bird boxes for various species, a hedgehog house and site won log piles. Furthermore, the majority of planting is nectar rich, thus creating foraging and nesting opportunities for local wildlife.

6.49. Further Biodiversity Net Gain is achieved via the introduction of an intensive green roof. This is zoned to different depth substrates to maximise planting opportunities. Larger shrubs such as amelanchier, cornus kousa and mahonia sit centrally, within islands of perennials including spurges, bugle, alliums, grasses and whirling butterflies. The outer perimeter is home to the creeping low varieties including, thyme, thrift, scabious and primrose.

## **Delivering Neighbourly Development**

6.50. National and local policies indicate that permission should be withheld for development that causes demonstrable harm to the amenity of neighbours. Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that: B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

6.51. The area is predominantly residential, however the site is some distance away from other residential properties and the site is heavily screened with vegetation. The pre-application advice concluded: *"The closest neighbouring properties to the pre-application site are those sited approximately 28 metres to the south-east on High Road, 50 metres to the south-west on Fore Street and 50 metres to the north-west on Mount Park Road. As such, a 21 metre separation distance between windows of the proposed development and the habitable rooms of adjacent properties will be maintained".*

6.52. The proposed nursery closes at 6pm and is a use complementary to the residential character of the area. Accordingly, it is considered that there would be no adverse impact on the surrounding residential amenity. Given the site is a secluded derelict plot of land, it has in the past attracted anti-social behaviour and arson to the protected trees. Therefore, bringing the site into educational use would prevent anti-social behaviour and CCTV cameras will be used to protect the site at night. Improved safety to the area would be of benefit to the local community.

6.53. The nursery provides care for under school age children and operates during working hours of the week. The site is screened from the street scene and good distance from immediate neighbours and there is no reason to conclude that the proposal would create any noise issues. Conditions could be added to ensure that the proposal does not result in any noise disturbance.

### **Inclusive Design**

6.54. Policy D5 of the LP requires developments to achieve the highest standards of accessible and inclusive design.

6.55. The proposal provides a fully accessible single storey building with a gentle slope to access the building.

## **Highways and Parking**

6.56. Policy T2 of the LP states that development proposals should deliver patterns of land use that facilitate residents making shorter, regular trips by walking or cycling. Policy T2 also states that development proposals should reduce the dominance of vehicles on London's streets whether stationary or moving.

6.57. Policy T6 of the LP states that car-free development should be the starting point for all development proposals in places that are (or are planned to be) well-connected by public transport, with developments elsewhere designed to provide the minimum necessary parking.

6.58. The site has a low PTAL rating of 1b, however it is local education/community business which intends to cater for the local population and employ people from the local area. Therefore, its rating from train stations is not as relevant to this specific proposal. It is situated within a predominantly residential area which it intends to serve. There is a bus stop outside the site. There is also a train station of Eastcote within 12 minutes' walk. 10 Car parking spaces and 25 cycle spaces are proposed - 15 are contained within a 2-tier cycle shelter and a further 10 spaces within a covered Sheffield stand. The parking is to be provided, with a geo cellular porous surface to protect the tree roots. There is also a potential location marked for a new covered bus stop within the street boundary of application site, which would be of public benefit to improve the existing non-covered stop.

6.59. A detailed Transport Report by Paul Mews Associates Ltd is submitted as part of this application. The report addresses the pre-application advice given by Hillingdon Council and addresses the transport policy requirements. The report concludes:

6.60. "To summarise, the development proposals seek to provide a nursery on site. The nursery will have 80 places available, with a daily maximum of 64 children on site. 22 childcare staff will be employed, in addition to three ancillary staff members.

6.61. Ten car parking spaces are proposed, inclusive of five disabled bays. An area dedicated to drop off has also been proposed, which allows for vehicles to drop off within the site.

6.62. Parking surveys have been carried out at the expected peak operational times for the nursery which have demonstrated that there is a reserve surplus in unrestricted kerb side parking capacity on the roads adjoining the site.

6.63. In any given measured 15-minute period in the AM and PM peaks the parking stress has not been greater than 64% on the adjoining roads.

6.64. The parking provision provides enough parking in order mitigate any overspilling parking occurring.

6.65. The parking surveys demonstrate that in the AM and PM peak periods there is a reserve surplus in kerb side parking capacity at present and therefore the proposed nursery will not have an adverse impact on road safety, emergency access, amenity or street scene, and have not led to unacceptable levels of additional overspill parking on the adjoining highway.

6.66. The site currently has off-street access via a dropped kerb which will be altered to provide a slightly larger access point. This will result in a small impact on the adjoining on-street parking, which will reduce the number of available spaces by one.

6.67. The site's servicing arrangements are considered to be safe and satisfactory. Refuse collection is expected to take place from Fore Street and vehicle swept path analysis shows that typical 7.5t panel vans can adequately access the site internally.

6.68. The client is encouraging sustainable travel to and from the proposed site via the Travel Plan measures outlined herein".

### **Cycle parking**

6.69. Policy T5 of the LP states that development proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle. The policy is clear that proposals should do this by meeting providing cycle parking at least in accordance with the minimum standards set out in Table 10.2 and Figure 10.3. The cycle parking should be fit for purpose, secure and well-located. The minimum cycle spaces for this development is 3 for staff and 8 for children (11 spaces). 25 cycle spaces are proposed, 15 are contained within a 2-tier cycle shelter and a further 10 spaces via 5 Sheffield stands. The parking is to be provided with a geo cellular porous surface to protect the tree roots.

### **Flood Risk and SUDS**

6.70. A Flood Risk Report and Sustainable Drainage System Plan is submitted as part of the application submission. The Flood Risk recommendations include:

6.71. Recommendations for mitigation are provided below, based upon the proposed development and the flood risk identified at the site.

- As there is a risk of flooding from fluvial sources, where flood levels could be up to 43.22 m AOD in the area proposed for development, Finished Floor Levels (FFL) of the proposed development should be set to at least 43.52 mAOD1. Development proposals include the raising of ground levels in the area of the proposed nursery building by 300 mm and finished floor levels of the aforementioned building by a further 300 mm, resulting in a finished floor level of 44.0 mAOD which is 0.48 m above the minimum recommended floor level. Standard flood resilient design measures should also be incorporated.*
- There is also a risk of flooding from surface water (pluvial) sources, where flood depths in the area proposed for development could be up to 0.6 m in depth during a 1 in 100 year event. Surface water flood risk will be sufficiently mitigated by the aforementioned raising of the proposed building and implementation of the recommended Sustainable Drainage Scheme to accompany this report (ref: 77698.01R1). Ground levels should be*

*designed to channel any overland flows from off-Site (to the north) away from the development and associated Site drainage systems.*

- There is a risk of flooding from groundwater sources at the surface, however the aforementioned mitigation measures will be sufficient to negate groundwater flood risk., Standard flood resilient design and non-return valves on the sewer inlet, French drains and/or pumping systems may also be considered.*
- Flood waters will be displaced due to the proposed development and as a result the provision of compensatory storage is required. Compensatory storage could be provided by lowering ground levels in areas of the Site which are outside of the 1 in 100 year + 21% fluvial flood extent, adopting a level for level and volume for volume approach. However, due to the limited extent of the Site being suitable for compensatory storage, alternate strategies to mitigate floodwater displacement (e.g., voids and stilts underneath the proposed development) should be discussed with Hillingdon Borough Council.*
- A Flood Warning and Evacuation Plan (FWEP) is recommended to ensure persons using the Site can evacuate safely on receipt of a Flood Warning.*
  - o Occupants of the Site should be signed up to receive EA Flood Alerts and Flood Warnings.*

6.72. The flood report concludes “*Providing the recommended mitigation measures are put in place it is likely that flood risk to this Site will be reduced to an acceptable level*”.

6.73. A sequential test has been prepared following the Council’s flooding concerns. The Sequential Test Concludes: “The application proposes the erection of a single storey detached nursery building including access, landscaping, a garden area, and parking. The site is mainly located in flood zone 2 but there are some areas to the rear which are located in flood zone 3. Of the 235 sites identified 233 of these were discounted due to the size of the site or additional flooding implications. The remaining sites were assessed in section 5 of the FRA statement. One of the sites was no longer available whilst the other site was unsuitable due to amenity, transport, and demand reasons. Therefore, no alternative sites have been found

in relation to amenity, transport, and demand reasons. Therefore, no alternative sites have been found in relation to the proposal for a single storey nursery”.

6.74. Given the requirements of the NPPF are to apply a “pragmatic approach” on the availability of alternatives when undertaking the Sequential Test, the suitability of these sites have then been assessed. This concludes that none are considered suitably similar, available, developable, or deliverable to support the development proposed.

6.75. The pre-application advice also concluded: “The applicant will need to put forward compelling reasons as to why the application is essential for the Council and its residents”.

6.76. As explained above under principle, the quality of a nursery set amongst the existing trees and diverse landscaping scheme would provide an excellent educational provision for the borough. It is considered to be a valuable education facility for our early years children and will have great benefit to local families. A Marketing Report is submitted which demonstrates the overwhelming market for early years’ childcare provision and the lack of current spaces in the local area. The report concludes: “Within the families, we estimate there are 13,748 children aged 0-2 and 9,166 children aged 3-4 (total of 22,914). Considering your setting is proposed to accommodate 80 children, you will require a market share of 0.3% of all children. Focusing on the two lifestyle groups most likely to use a setting like yours, that still shows 1 0,748 children aged 0-4 living in families we classify as ‘All Day, Every Day’ and ‘All Day, Most Days’, suggesting a required share of your core addressable market of 0.7%. Within 15 minutes of the setting there are 65 potential competitor settings. Of these, 43 have had inspections since 2018, detailing capacity for 2,172 children with 2,482 registered. This suggests they are over capacity by 14%. These settings accommodate 9.4% of all children aged 0-4, suggesting there is a shortfall of 20,742. Your setting of 80 places requires just 0.3% of this shortfall. This analysis details a shortfall in the number of nursery places within this catchment area, suggesting additional capacity is required a setting of 80 places requires a 0.3% market share.”

6.77. The application site is an ideal opportunity to provide an educational nursery facility of the highest standard, on a private piece of land which currently has no current public benefit.

There is no reason more compelling than the provision of a good start to life for the local children of Eastcote. There is a significant net gain in biodiversity to the site, new tree planting, new hedgerows and other landscaping. The improved ecological benefit of the site is another compelling reason for making better use of this redundant piece of land.

### **Refuse and Recycling**

6.78. Refuse and recycling would be organised by a separate private contractor. There is an appropriate storage container indicated on the submitted plans. The existing site access from Fore Street is to be retained. There is already an existing drop-down kerb into the site. However, this can be improved via section 278 agreement linked a condition if the Council feels it is required.

### **Energy**

6.79. This development will:-

6.80. Be lean- Construct to high thermal performance standards with u-values exceeding minimum Building Regulation Targets as required.

6.81. Be clean- Utilise a clean energy supply supplemented by heat pumps to reduce emissions generated from heating and hot water and utilise A rated appliances to reduce energy requirements.

6.82. Be green- Air source heat pumps will likely be selected as a renewable energy source. It is envisaged that due to the heritage site restrictions, the best means of renewable energy provision would be the Mitsubishi ultra quiet ecodan air source heat pump, further details of which could be conditioned.

### **Air Quality**

6.83. Paragraph 186 of the National Planning Policy Framework (2021) states that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure provision and enhancement. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan. Policy SI 1 of the London Plan (2021) further supports this.

6.84. Accordingly, an air quality report is submitted as part of this application to address the policy requirements. The report concludes; “All predicted NO2 and PM10 concentrations at the modelled receptor locations and existing receptor locations fall below the Air Quality Objective and the changes predicted due to the increase in AADT due to the development once operational are negligible”.

### **Community Infrastructure Levy (CIL)**

6.85. The proposal would be liable for the Mayoral Community Infrastructure Levy (Mayoral CIL) of £60 per sqm, with a net internal area of 422sqm, the CIL would be £25,320. The Council’s CIL does not include day nurseries of 422 sqm. But the Applicant is willing to pay for the new bus stop shelter and associated works on or next to the application site, if the Council agrees that would be of benefit.

## 7. CONCLUSION AND OVERALL PLANNING BALANCE

- 7.1. The proposal provides a day nursery providing both educational, and community benefits to the local public. The proposal provides new jobs to enhance the local economy. The proposal preserves and enhances the green character of the area, with the protection of the dense hedges and trees surrounding the site, the new tree planting scheme and a biodiversity enhancement project.
- 7.2. The proposal is considered to complement the varied character of this high-quality suburb preserving and enhancing extensive natural landscaping and trees on site, in accordance with the Conservation Area Goals.
- 7.3. The flood risk, suds and sequential test assessment have demonstrated that “Providing the recommended mitigation measures are put in place it is likely that flood risk to this site will be reduced to an acceptable level”. Conditions can be put in place to secure the implementation of SUDS and flood mitigation.
- 7.4. The proposal has addressed the Council’s concerns raised in the pre-application submission. 11 independent professional reports from various specialists are submitted to demonstrate the proposal fully addresses the relevant technical issues and associated policy requirements.
- 7.5. The proposal provides an idyllic early year’s nursery set in a site which will benefit from improved ecological and biodiverse setting. The proposal is a unique development offering a verdant setting to begin the children’s lives, whilst enhancing biodiversity and preserving the quality of the trees surrounding the development for the future. The proposal is a no dig (no foundation) development so is easily removable once the building life has ceased to serve its purpose. The vegetation surrounding the site is dense and only glimpses of this compatibly designed and wood clad development would be seen from the streetscene. The proposal can turn this unused, unallocated plot of land, which currently attracts anti-social behaviour and arson, into a cared for more biodiverse green space, with a rich landscaping scheme and an early learning educational facility which Hillingdon can be proud of, providing for its children.

7.6. The application is consistent with the development plan and the NPPF. Application of section 38(6) of the Planning and Compulsory Purchase Act 2004 indicates the development should be permitted. In applying the tilted balance, the development is demonstrably sustainable and should be approved reading the NPPF as a whole. No material considerations suggest that planning permission should be withheld. All material considerations reinforce the justification for planning permission. For these reasons, it is politely requested that planning permission is granted.