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Corporate Resources
Hillingdon Council

29th September 2023

Ref. 12853/APP/2023/1492
BY EMAIL

Dear Michael,

RESPONSE TO CONSULTATION FEEDBACK FOR PROPOSALS AT HAYES PARK CENTRAL AND SOUTH, HAYES PARK, HILLINGDON - PLANNING REF. 12853/APP/2023/1492

We write on behalf of our client, Shall Do Hayes Development Limited (the 'Applicant') in relation to the full planning application (Ref. 12853/APP/2023/1492) for the residential conversion of Hayes Park Central and South, Hayes Park, Hillingdon, UB4 8FE (the 'Site').

During the statutory consultation period for this application, a range of public and statutory consultee comments were made on the proposals. This letter provides an overview of the comments and queries which have been raised in relation to the proposed development and provides clarification and further information where requested.

This should be read in conjunction with the following documents and drawings, which have been submitted with this letter. The documents are referenced throughout this letter to provide clarity on the information provided.

Table 1: Drawings and documents submitted alongside this letter

Document	Consultant
Design Response	Studio Egret West (SEW)
Glazing Investigation Report	Hutton and Rostron
Transport Note	Waterman
Air Quality Assessment	NRG
Air Quality and Dust Management Plan	NRG
Whole Life Carbon Memo	Hoare Lea
Whole Life Carbon Assessment	Hoare Lea
Circular Economy Memo	Hoare Lea
Circular Economy Statement	Hoare Lea
Circular Economy Workshop Notes	Hoare Lea
Pre-Demolition Audit	WPS
Energy Memo	Hoare Lea
SAP Reports	Hoare Lea
Fire Design Note	Hoare Lea
Flooding and Drainage LLFA Response	Whitby Wood

Document	Consultant
Flooding and Drainage GLA Response	Whitby Wood
Flood Risk Assessment	Whitby Wood
Drainage Assessment and Strategy	Whitby Wood
Proposed Drainage Layout	Whitby Wood
Exceedance Plan	Whitby Wood
Drawings Issue Sheet	SEW
0419-SEW-ZZ-ZZ-DR-A-253215 Proposed Elevational Detail Bay-Ext view 1-HPC&HPS	SEW
0419-SEW-ZZ-ZZ-DR-A-253216 Proposed Elevational Detail Bay-Ext view 2-HPC&HPS	SEW
0419-SEW-HS-00-DR-A-253225 Proposed Elevational Detail Ext view-HPS Courtyard	SEW
0419-SEW-HC-00-DR-A-00111 Proposed Level 00 - HPC	SEW
0419-SEW-HC-00-DR-A-00112 Proposed Level 01 - HPC	SEW
0419-SEW-HC-00-DR-A-00113 Proposed Level 02 - HPC	SEW
0419-SEW-HC-00-DR-A-00116 Proposed Level 00 - HPS	SEW
0419-SEW-HC-00-DR-A-00117 Proposed Level 01 - HPS	SEW
0419-SEW-HC-00-DR-A-00118 Proposed Level 02 - HPS	SEW
0419-SEW-ZZ-00-DR-L-001000 Landscape Masterplan	SEW
0419-SEW-ZZ-00-DR-L-001001 Landscape Plan - Central Building	SEW
0419-SEW-ZZ-00-DR-L-001002 Landscape Plan - South Building	SEW
0419-SEW-ZZ-00-DR-L-001003 Soft Landscape Character Plan	SEW
0419-SEW-ZZ-00-DR-L-001004 Landscape Masterplan w/ Site Boundary	SEW
0419-SEW-ZZ-00-DR-L-001005 Building Interface Sections - HPC	SEW
0419-SEW-ZZ-00-DR-L-001006 Building Interface Sections - HPS	SEW

Response to Statutory Consultee Comments and Queries

Design and Conservation Comments

A range of comments on design and conservation matters were received from the GLA, Historic England and LB Hillingdon's Design and Conservation Officers. Below we have taken each matter in turn and set out the key issues and the Applicant's response.

The Canteen

Whilst in an office use, Hayes Park South had a large canteen area to serve the employees of the building. This served a specific purpose of providing food and drinks to the workers throughout the day. The proposed development seeks to convert the office building into a residential use. It has been

established that the residential use is the optimum viable use of the site and that the buildings are not going to be used for office or employment purposes in the future. As such, to bring the buildings back into use, the space where the canteen previously was has been adapted and reduced in size and turned into an indoor amenity space for residents, with the rest of the old canteen space being repurposed as flats.

SEW have carefully designed this amenity space to respect some of the original intent of the canteen, by ensuring there is a clear line of sight through the building from the front entrance, through the courtyard, to the old canteen space. This line of sight is retained through the new proposals.

Historic England were supportive of the approach taken to the canteen, with them recognising and supporting that the canteen space had been made larger during the course of the pre-application discussions. They commented that they *'are pleased that the proposed plans would retain a sense of openness within the entrance lobby to the South building, which we note has been increased in size in response to our pre-application comments'*.

The LB Hillingdon Design and Conservation Officers noted some concern with the approach to the canteen. They stated that *'both from a heritage and liveability perspective, it would be preferable to increase the openness of the canteen as a communal social space'*. Their specific concern related to the sightlines through the building being limited to a narrower space than was originally there with the original canteen. As such, officers requested that the canteen area, or entrance into this area, be made larger to provide more amenity space and wider sightlines through the building.

SEW have prepared an architectural response to this in the accompanying design statement (page 27). In summary, the Applicant considers that the proposed space is wholly appropriate for the new use of the building and is not intending to amend the size of the canteen space for the following reasons:

- The new canteen space has been designed to function as an internal communal lobby space and its dimensions are appropriate for this quantum of residential use.
- The sightlines through the building have been retained. A 4m wide route into the central courtyard from the canteen space is proposed. This is considered to be a generous size and again wholly appropriate for the proposed residential use. The previous canteen space needed to be very large to accommodate the large number of staff that would have used it a defined time.
- Retaining the symmetry of the canteen space is important for the heritage of the building. The partitions of the canteen space have been designed to align with the existing curtain wall locations. If the canteen entrance were to be widened, to retain this symmetry it would need to be widened by an additional two bays, totalling 2.8m.
- The resulting space would feel oversized for its function. The residents have access to a significant quantum of amenity space as part of this scheme, through the wider landscaping and courtyards. It is not considered necessary to make this internal space any larger.
- Increasing the width would result in the adjacent homes falling below space standards. So essentially resulting in the loss of two homes and therefore impacting on the viability of the proposed development

Hayes Park South Reflective Pool

When in an office use, Hayes Park South had a large decorative reflective pool in the central courtyard. The original feature comprised a shallow area of water filling the entire pool space, with a larger tree in the corner. The pool has since been drained and is filled with pebbles.

The proposed development sought to reinstate the pool in a manner suitable for the new residential use. Whilst the SEW team did consider reinstating the pool in full, back to its original form, it was considered that this would not offer much in the way of value to the new residents. Instead, the new

pool was reinstated in a way which is more functional and provides a more usable feature for the new residents, including a walkway through the centre, some seating and a Japanese garden.

Historic England are supportive of the way in which the pool has been reinstated. They noted that the *'restoration of the courtyard pool and island as proposed offers enhancements to architectural interest of the listed building'*. Historic England listed the reinstatement of the reflective pool as one of the public benefits of the scheme.

The Design and Conservation officer from LB Hillingdon have requested that the pool is reinstated in full. They have noted that as it is not reinstated in full, it does not provide as much heritage benefit as hoped for.

SEW have prepared an architectural response to this in the accompanying design statement (page 28). The Applicant consider that the proposed design approach is wholly appropriated for the proposed residential use and is not intending to amend this part of the proposal, as it is considered that the pool has been reinstated in a way which respects the heritage of the building whilst making the space more usable and functional for the new residential use.

Mock Up

LB Hillingdon's Design and Conservation Officer has requested that a mock-up is provided of the proposed approach to the curtain walling, sliding doors and balcony/balustrade treatment. LB Hillingdon have requested that this is provided prior to planning permission being granted. Historic England have also requested this information, but they are satisfied that this can be provided at the planning condition stage.

The Applicant is happy to provide the mock-up, but it is considered that providing this prior to permission is an overly onerous request. SEW have set out details in their report (page 14) regarding how the mock-up would be approached. They are proposing to build the mock-up on the building, as this provides the most value from this exercise.

An email was sent from Iceni Projects to the LB Hillingdon case officer (Michael Briginshaw) on 15/09/23 setting out the case for the mock-up being requested by condition, rather than prior to permission. The case officer responded by email on 26/09/23 noting that the Council accepted that securing the mock-ups by condition was the best way forward.

Glazing

Both Historic England and LB Hillingdon Design and Conservation officers have requested more evidence to show that the glazing would be replaced with a dark of a similar colour to that originally in place. SEW have made clear that they intend to use a dark grey glazing; however, the final appearance will depend on the technical specification of the final glazing. This can be tested in the mock-up. Further details provided in page 16 of the Design Response document.

Balcony Balustrades

LB Hillingdon Design and Conservation officers have requested more details explaining how the balcony balustrades relate to the windows and glazing mullions. SEW Design Response document (page 18) and updated drawings 0419-SEW-ZZ-ZZ-DR-A-253215 and 0419-SEW-ZZ-ZZ-DR-A-253216 show how the balustrade supports align with the glazing mullions.

Balcony Pebbles

The existing balcony areas on both buildings have been filled in with pebbles. These pebbles are not original. The LB Hillingdon Design and Conservation officer requested that the pebbles are integrated within the new design. The SEW have explored this and have shown in the updated plans and Design Response document (page 19) how the pebbles could be used to demarcate one balcony from another.

Curtain Walling Survey

The Council have requested a condition report which justify the wholesale replacement of the curtain walling. A Glazing Investigation Report by Hutton and Rostron has been submitted alongside this letter. This provides details which explains why the team have proposed to replace the curtain walling. Further details are also provided in the SEW Design Response document (page 13).

PV Panels

PV's have been provided on the roof of both buildings. Clarification was sought regarding how these PV's would be viewed, with LB Hillingdon officers clarifying that the PVs should not be visible in any views. The views tested as part of the Heritage and Townscape Visual Impact Assessment show that the PVs are not visible. The section set out in Page 21 of the SEW Design Response shows that the PVs would also not be visible from the internal courtyard.

Windows on Plans

LB Hillingdon Design and Conservation officer noted that there are rooms on the ground floor which appear to have no windows. SEW have clarified that drawing conventions mean plans are usually cut at 1m, and as such, the higher windows were not shown on plans. Drawing 0419-HC-00-DR-A-00111 has been updated to show the location of all windows. Further details provided on page 30 of the Design Response document.

LB Hillingdon also noted that a bedroom window on a unit on the west elevation is blocked by an opening door. SEW have updated the drawings (0419-HC-00-DR-A-00112) to show this door hung the other way so this clash does not occur. Further details provided on page 25 of the Design Response document.

Ground Floor Privacy

The HPS internal courtyard has been reconfigured to create a usable communal space. LB Hillingdon Design and Conservation officer noted that encouraging the use of the courtyard as communal amenity has the potential to create privacy and noise issues.

The Applicant is keen for residents to have access to as many different amenity spaces as possible. Residents will have access to the grounds surrounding the site, their own private balconies, as well as these central courtyards. The courtyards are designed to be quite spill out spaces, and they have been designed to encourage residents to meet and socialise. There are many examples where these types of spaces have been successful in encouraging community cohesion within new residential developments (see examples in SEW Design Response page 29).

Nevertheless, SEW have shown how planters could be introduced to provide additional screening and defensible space, which would help to increase the privacy available to residents living at the ground level. This change has been shown on drawing 0419-SEW-HS-00-DR-A-253225.

Landscape Comments

Landscape Cut Outs

In order to provide more private external amenity space for the homes, as well as improved daylight and sunlight, SEW have introduced some landscape cut outs in the ground surrounding the buildings. These cut outs also have the benefit of creating a landscape mound surrounding the buildings, which means the buildings appear as two-storey structures. Appearing as a two-storey structure was an important element of the original proposals due to their location within the Green Belt.

Clarification was sought from both LB Hillingdon and Historic England on the extent of the cut outs. SEW have prepared two new drawings demonstrating the location and depth of the cut outs (0419-SEW-ZZ-00-DR-L-001005 and 0419-SEW-ZZ-00-DR-L-001006) and further details are provided on page 32 of the Design Response document.

Landscape Balustrade

A balustrade has to be proposed within the landscape to comply with Building Regulations. Even if the building was re-occupied as an office, this feature would be required. SEW have used the same material for the landscape balustrade as proposed for the balcony balustrade. The design approach ensures the balustrade is lightweight and almost transparent, whilst providing the level of protection required by Building Regulations. Page 33 of the SEW Design Response sets out the approach to the balustrade.

Garden Square

Currently, the Site contains a large and unsightly roundabout, to the north of HPC. This roundabout provided a safe road connection from the site entrance to the different parking locations throughout the site. This was necessary to support the office use due to the number of vehicle movements associated with that use when the buildings were occupied.

The proposed residential use generates less trips than the original office use. The Applicant has therefore proposed to remove the roundabout and introduce a new Garden Square. This space will still allow vehicles to pass through the space, but the area has been redesigned to provide more communal areas of amenity, as well as planting.

Both LB Hillingdon and Historic England welcomed the new Garden Square. Historic England noted that the removal of the roundabout and the replacement with a new public square is one of the public benefits of the scheme. LB Hillingdon have requested increased greening on the new square.

SEW have reviewed the proposals for the square and have introduced increased planting, to tie this garden square in more directly with the pastoral landscape being proposed throughout the remainder of the Site. Page 35 of the Design Response document explains the changes in full. Drawings 0419-SEW-ZZ-00-DR-L-001000 AND 0419-SEW-ZZ-00-DR-L-001001 have been updated to reflect this change.

Play Space

The Applicant is proposing an area of playspace within the wider grounds of the Site. The provision of playspace is required by policy and the principle of this has been welcomed by the GLA and LB Hillingdon. LB Hillingdon have requested clarification regarding the extent of excavation proposed to accommodate the playspace, noting that they are concerned by the extensive excavation work that would be required to create the 1m high retaining wall.

SEW have provided an explanation of the approach to the playspace levels on pages 37-38 of the Design Response and in Drawing 0419-SEW-ZZ-00-DR-L-001006. This shows that only 0.5m would be excavated, and another 0.5m would be banked. This approach means that the playspace can be nestled within the landscaping, and reduce the visual impact on the Listed Buildings.

Mown Paths

In line with the biodiverse, pastoral landscape being proposed, SEW have proposed mown paths through the Site, to provide connections between buildings and the parking. LB Hillingdon noted that this approach was not reflected on the plans. LB Hillingdon also proposed a more suitable type of surface for some of the hardstanding paths. SEW have since updated Drawing 0419-SEW-ZZ-DR-L-001000 and 0419-SEW-ZZ-DR-L-001004 to show these updates to the paths. More information also provided on page 40 of the design response document.

Urban Greening Factor

The Applicant is aware of the requirement to provide an UGF of 0.4 for new residential development. This was an important consideration throughout the design of the proposals. The Application red line boundary includes access roads and areas of parking which are not being developed. The Applicant originally submitted the application without these areas within the red line, but LB Hillingdon requested that they be added in. As these areas increase the site area significantly, they resulted in a lower UGF than originally intended.

When the actual development area is taken into account, the proposed development has an UGF of 0.397, which rounded up is 0.4. A detailed explanation of this as well as the UGF calculation is provided in Page 45 of the Design Response document. This shows how the development achieves the required UGF.

Planning Policy Comments

Planning policy comments on the scheme cover a range of matters. Most notably, the comments accept that the proposed residential use is the optimum viable use for the Site and accept the loss of the existing employment floorspace. Planning policy commentary also notes that the proposals would not have an impact on the Green Belt, and as such they are acceptable in this regard.

Policy officers also commented on the affordable housing provision. We have also received further follow up advice from BNP Paribas, who were appointed by the Council to review the viability assessment. To date, we have not received the GLA affordable housing comments, and as such, we cannot provide further comment on this matter until this response has been received.

The key comment from the planning policy team relates to the proposed housing mix. LB Hillingdon consider that the proposed development should have a greater number of three-bedroom homes, nearer to the 20% preference set out in policy.

The proposed housing mix has been proposed to respond to local market demand, local housing need, as well as the heritage constraints of the two Listed Buildings. Overall, the number of three-bedroom homes proposed is at 14%. Whilst below the 20%, this is still a generous amount of three-bedroom homes. Increasing the number of three-bedroom homes further was considered, but the glazing modulation of the building, which is a key part of the heritage of the building, means that these homes become inefficiently large, resulting in less homes, and ultimately making the scheme less viable and deliverable. A careful balance is needed to ensure the scheme provides the right mix of homes, as well as being deliverable so that these listed buildings can actually be brought back from a state of disrepair and into use.

SEW have prepared some alternative options as part of the Design Response document (page 23). In these options, SEW have combined some of the one- and two-bedroom flats to create larger three-bedroom homes. In doing so, the scheme loses eight one- and two-bedroom flats, and gains four three-bedroom flats. Resulting in an overall loss of four units. In this scenario the scheme would have 19% three-bedroom units. However, the new three-bedroom homes are not suitable, as they are single aspect and oversized by 10%. This alternative layout would result in a highly inefficient scheme, which would reduce the viability of the proposals and make the scheme undeliverable.

SEW have worked very hard to design the optimal scheme for the buildings, which manages to respect the important heritage features, whilst creating new homes which will help to bring life into these abandoned buildings. SEW have considered many design options for the Site, and the approach taken using scissor flats helps to generate a high proportion of very high quality, dual aspect flats. This design approach has been taken, whilst trying to maximise the number of three-bedroom homes. In testing out this alternative option with 19% three-bedroom homes, SEW have demonstrated that the original option with 14% three-bedroom homes is the optimum solution for the site.

Transport and Highways Comments

A range of comments were received from the GLA and LB Hillingdon on transport and highways matters. A detailed note has been prepared by Waterman in response to these comments (Dated September 2023), and this should be read in conjunction with this letter.

Below we have summarised the key comments and the Applicants response.

- ATZ Assessment – Waterman have prepared a route map as requested. See Appendix A of the Waterman letter.

- Planning Obligation – Waterman have reviewed the request for a contribution of £327,400 towards improvements to the pedestrian and cycle network. They have concluded that this contribution is unreasonable and excessive for a range of reasons. One of the key reasons is that the proposed development would result in a net-reduction in walking trips and a negligible increase in cycling trips when compared to the baseline. The deficiencies that the Council are seeking the contribution for already exist and the improvements the contribution would help to provide would not all be directly related to the development.
- Disabled routes – As requested by the GLA, a direct and continuous footpath will be provided between the three disabled bays in the north and the buildings. This has been updated on the landscape plan.
- Disabled parking – 15 accessible disabled parking bays are provided. This represents 12% of the total parking provision and as such exceeds the minimum 3% required.
- Cycle Parking – Waterman have confirmed how the GLA London Cycle Design Standards have been met.

Air Quality Comments

Further clarification was requested from the GLA regarding the Air Quality Assessment. An updated version of this report has been prepared and is submitted alongside this letter. An Air Quality and Dust Management Plan has also been prepared and accompanies this submission.

Drainage and Flooding Comments

The GLA and LLFA had a number of queries regarding the flood risk and drainage assessments. Whitby Wood have reviewed these comments and prepared individual response documents to the LLFA and the GLA, as well as updated Flood Risk Assessment and Drainage Strategy Report. These reports all accompany this letter.

Daylight and Sunlight

Further information on the materials and reflectance's used in the daylight and sunlight assessment was requested. SEW and Development and Light consultants have worked together to prepare the response to this within the SEW Design Response document (page 5-10). This sets out details of the materials which could be used and the associated reflectance's assumed in the assessment. These materials are indicative for the purposes of carrying out the daylight and sunlight assessment. Final material details would be confirmed by condition.

Fire

The GLA were satisfied by the content of the submitted Fire Statement, but they did ask for further information relating to the fire engineered solutions. A Fire Design Note has been prepared by Hoare Lea to respond to the questions.

Energy, Whole Life Carbon and Circular Economy

Comments were provided by the GLA on the Energy Assessment, Whole Life Carbon and Circular Economy reports prepared by Hoare Lea. These specific comments have been collated and responded to in the technical memo prepared by Hoare Lea and accompanying this letter. Additional material has also been provided, including a copy of workshop notes from a Circular Economy Workshop, an updated Pre-Demolition Audit and the outputs from the SAPs.

Response to Public Consultation Comments

As part of the statutory neighbourhood consultation, eight public comments have been received in relation to the proposals. The key matters raised by these comments as well as our response is set out in the table below.

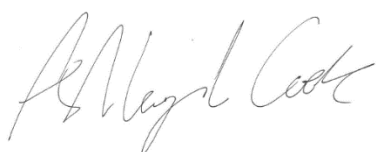
Table 2: Overview of public comments and the Applicant's response

Public Comment	Applicant Response
Concern about changing use of historic building	The buildings are currently in a state of disrepair. There is no interest from employment occupiers to take on the building. Finding a new use for the building will help repair and restore the buildings, bringing them back into long term use. Using the building for residential purposes has been determined to be the optimum viable use.
Impact on community infrastructure	The Applicant will be required to pay a community infrastructure levy charge which will be used to fund community infrastructure.
No need for more homes	There is a housing crisis throughout the UK, and the issue within London is particularly pressing. There is a need for new homes and re-using existing underutilised buildings is an efficient way of delivery new homes.
Increased traffic	The proposed development would result in less traffic movement than the current permitted use. The 1:1 parking ratio will also help to encourage residents to use the car less, as they will only have a space to park one car. Full details of traffic impact is provided in the Transport Assessment.
Lack of parking	Parking is being proposed at a 1:1 ratio in line with planning policy requirements and the evidence presented in local census data.
Impact on landscape	The landscape is an important feature of the site which is being retained and improved as part of the proposals. The landscaping will be enhanced to provide more biodiversity benefits.
Construction impact	A construction management and logistics plan will be prepared and submitted to ensure a carefully considered approach to the construction phase.
Sustainability measures	A full suite of energy and sustainability documents have been prepared in support of the proposals, including an Energy Strategy, a Sustainability Statement, Whole Life Carbon report and a Circular Economy Assessment. The proposal has PV panels on all suitable roof surfaces and will utilise a

Summary

We trust the above information is comprehensive and responds effectively to all the comments and queries which have been received from the statutory consultees to date. Should you require any further assistance please do contact either Ashleigh Cook (acook@iceniprojects.com) or Nick Grant (ngrant@iceniprojects.com).

Yours sincerely,



Ashleigh Cook
Associate