

# Hayes Park

## Planning Statement

May 2023

Iceni Projects





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# Planning Statement

Hayes Park, Hayes End Road, Hayes, UB4 8FE

Iceni Projects Limited on behalf of  
Shall Do Hayes Developments  
Limited

May 2023

ICENI PROJECTS LIMITED  
ON BEHALF OF SHALL DO  
HAYES DEVELOPMENTS  
LIMITED

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**Planning Statement**  
HAYES PARK, HAYES END ROAD, HAYES, UB4 8FE



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## APPENDICES

A1. FULL PLANNING HISTORY

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# 1. INTRODUCTION

1.1 This Planning Statement has been prepared by Iceni Projects Ltd ('Iceni') on behalf of Shall Do Hayes Developments Limited ('the Applicant'), in support of an application for full planning permission and listed building consent for the proposed development at Hayes Park, Hayes End Road, Hayes, UB4 8FE ('the site').

1.2 This application seeks detailed planning permission and listed building consent for:

Change of use of the existing buildings to provide new homes (Use Class C3), together with internal and external works to the buildings, landscaping, car and cycle parking, and other associated works.

1.3 The purpose of this Planning Statement is to provide the London Borough of Hillingdon ('the Council' / 'LBH') with an overall summary of the existing site and surroundings; the relevant planning history for the site and to provide justification for the Proposed Development in the context of Hillingdon's adopted Development Plan and national planning policies. This Planning Statement demonstrates that the proposed development detailed in this planning application offers a wide range of benefits, including:

- Full alignment with the Economic, Social and Environmental pillars of the NPPF.
- A variety of heritage benefits, including the retention and enhancement, through a sensitive, intelligent and well-considered conversion of two truly unique Grade II\* Listed heritage assets. The conversion of the buildings to residential has been agreed by all stakeholders to be the Optimum Viable Use and will secure a sustainable long-term use of the buildings, which will protect and allow future communities to celebrate and enjoy them for years to come.
- The delivery of 124 unique homes in a range of sizes, helping a Borough that is constrained by the Green Belt to plan positively for the future and to address future housing need. The type of housing proposed will address an identified need, providing opportunities for first time buyers and those looking to 'down-size', together with 14.5% family homes and a range of other typologies that would be suitable for young families.
- Deliver a sustainable residential development by re-using existing vacant buildings and introducing new energy and sustainability features as part of the new residential use. The

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overarching objective being to maximise the sustainability credentials, taking into consideration the site constraints, and to ensure the proposals accord and exceed the relevant current national and Council sustainability policy.

- Improve biodiversity at the site and integration with the wider natural landscape through improvements to the landscaping and greening of the site, together with creating a wide range of opportunities for future users of the site to interact with the natural landscape.
- The proposed development is aspiring to promote sustainable modes of transport and will reduce the excessive car parking provided by the previous office use.
- The Applicant will comply with the relevant requirements relating to planning obligations and CIL, bringing opportunities to enhance the local infrastructure in the area for residents, workers, and visitors.

### Submission Documents

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- 1.4 The following documents and drawings have been prepared and submitted in support of this planning application.

Table 1.1 Planning Application Submission Documents

Document title	Author
<b>Planning Documents</b>	
Application Form, Notices and Certificates	Iceni Projects
Planning Application Fee	The Applicant
Cover Letter	Iceni Projects
Planning Statement	Iceni Projects
<b>Architectural Documents</b>	
Site and Location Plans	Studio Egret West
Design and Access Statement ('DAS')	Studio Egret West
Existing and Proposed Plans (see drawing register)	Studio Egret West
<b>Technical Reports</b>	
Accessibility Statement ( <i>within DAS</i> )	Earnscliffe
Affordable Housing Statement ( <i>within this Planning Statement</i> )	Iceni Projects
Air Quality Assessment	NRG Consulting
Arboricultural Impact Assessment	Keen Consulting
Bat Survey Report	Greengage

Document title	Author
Biodiversity Impact Assessment	Greengage
Circular Economy Statement	Hoare Lea
Contaminated Land Survey (Phase 1 Environmental Report)	Avison Young
Daylight and Sunlight Assessment	Development and Light
Delivery and Servicing Plan	Waterman
Draft Heads of Terms ( <i>within this Planning Statement</i> )	Iceni Projects
Drainage Assessment and Strategy Report	Whitby Wood
Energy Strategy	Hoare Lea
External Lighting Plan	LightPAD
Financial Viability Assessment	Aspinall Verdi
Fire Statement	Hoare Lea
Flood Risk Assessment	Whitby Wood
Framework Travel Plan	Waterman
Heritage and Visual Impact Assessment	Iceni Heritage
Housing Mix Report	Iceni Projects
Landscaping Strategy ( <i>within DAS</i> )	Studio Egret West
Noise Impact Assessment	NRG Consulting
Outline Construction Logistics Plan	Waterman Group
Overheating Assessment	Hoare Lea
Preliminary Ecological Appraisal	Greengage
Refuse and Recycling Strategy	Waterman
Site Waste Management Plan	Waterman
Strategic Economic Case Report ( <i>inc marketing evidence</i> )	Iceni Projects
Statement of Community Engagement	Iceni Engagement
Strategic Economic Case Report	Iceni Projects
Sustainability Statement	Hoare Lea
Transport Assessment	Waterman
Tree Constraints Plan	Keen Consulting
Tree Protection Plan	Keen Consulting
Utilities Statement	Hoare Lea
Vibration Assessment	NRG Consulting
Whole Life Carbon Assessment	Hoare Lea

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## 2. APPLICATION SITE AND BACKGROUND

### Site Description

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#### Hayes Park

- 2.1 The site is located within the Charville Ward of the London Borough of Hillingdon, who are the determining local planning authority for the application.
- 2.2 The site is located off Hayes End Road and sits within a wider former business park known as 'Hayes Park'. The red line site area which forms the basis of this application is 3.73 hectares and comprises of Hayes Park South, Hayes Park Central, the surrounding grassland area, and the associated on street car parking and road areas. The site is generally rectangular in shape and is bound to the east and south by the open parkland, which is private land owned by the Church Commissioners. To the west the site is bound by the agricultural land and the buildings of Home Farm. To the north, the site is bound by Hayes Park North and the adjacent multi-storey car park, with open farmland beyond that.
- 2.3 The wider Hayes Park business park site (which includes Hayes Park North and the adjacent multi-storey car park - but does not form part of this application) extends to 5.22 hectares. The site is accessed from the east from Park Lane and from the west from Hayes Park Road.

#### Hayes Park Central and Hayes Park South

- 2.4 The Hayes Park Central ('HPC') and Hayes Park South ('HPS') buildings are both Grade II\* Listed and were designed in the 1960s by American architect Gordon Bunshaft as corporate offices and research laboratories for HJ Heinz UK Limited. The buildings have been occupied by various different occupiers since they were built but are now both vacant. Hayes Park Central has been vacant since September 2020 and Hayes Park South vacant since Summer 2017. Both buildings are three storeys in height and include a basement level used for plant and servicing.
- 2.5 HPC is located in the centre of the site and previously occupied by HJ Heinz UK Limited, and then Fujitsu Research of Europe Ltd. Since its construction in 1965, HPC has undergone significant alterations. The original columns have been entirely concealed by dividers which have broken up the building so that the sightlines through this heavily glazed building have disappeared. The exterior columns have been repainted, likely due to some deterioration overtime. Furthermore, a retaining wall originally stretched across the lower level of the building but has now been removed. Entrances into the building have changed so that now the main entrance is to the north. This would have affected the layout of the building and entrance lobby.



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- 2.6 HPS is located at the south of the site and is a three-storey rectangular building with central courtyard, previously occupied by HJ Heinz UK Limited. HPS has also undergone various alterations to accommodate the changing needs of its occupier. The most significant of these is within the central courtyard, where the original pond has been removed and replaced with loose pebbles. The central sculpture has remained. A further alteration is that internal supporting columns, which create a notable and striking layout through the entire building, have been boxed in. Though covered, the structural layout is still partially visible. The exterior columns have been repainted, likely due to some deterioration overtime. In 2010 there were further alterations by way of amendments to the existing staircases and alterations to the front entrance.
- 2.7 HPC and HPS were originally linked at basement level by a subterranean corridor, which remains but has now been blocked up.

#### **Planning Policy Designations**

- 2.8 The site is allocated within the Hillingdon Local Plan as Green Belt land. The site also borders a Nature Conservation Site of Borough Grade II or Local Importance
- 2.9 Council records indicate that there is a Tree Preservation Order affecting the site.
- 2.10 The flood risk map for planning identifies that the site is located in Flood Zone 1, and as such has a low probability of flooding.
- 2.11 In addition to the Grade II\* buildings on the Site, the LBH Local List also shows that the Site is located near two locally listed buildings to the west – Dalton's Dairy Farmhouse and Dalton's Dairy Farmhouse Outbuildings Site. The Site is also visible from the Ickenham Village Conservation Area to the north.

#### **Site Context**

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- 2.12 The wider area surrounding the site comprises predominantly of open space and residential dwellings. There is a wide selection of parks and leisure facilities, including the Hayes End Recreation Ground, Park Road Green and the Belmore Playing Fields. The nearest town centres are located at Hillingdon Heath Local Centre, 1.6km to the south west (19-minutes' walk'), and at Uxbridge Road Hayes Minor Centre, 3.3km to the south east (43-minutes' walk)
- 2.13 Many local services and facilities can be reached by foot in less than 15 minutes of the site, including:
- Iceland Supermarket
  - Kingshill Post Office

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- Park Road Green Playground
  - Lansbury Pharmacy
  - Hewens Primary School
  - Hewens College

2.14 In addition to the above, there are other important services and points of interest also reachable via bicycle, bus and car, including:

- Hillingdon Hospital
- Barra Hall Park
- Lake Farm Country Park
- Oak Wood School
- Uxbridge Station
- Hillingdon Station
- Uxbridge Sainsburys
- Hayes and Harlington Station
- Uxbridge Lidl
- Hillingdon sports and Leisure Complex

#### **Hayes Park North**

2.15 Hayes Park North is located to the north of the wider Hayes Park site and is a modern office building constructed in the early 2000s, which is now vacant. It was granted prior approval for a change of use to residential at appeal in June 2022 (Ref.12853/APP/2021/2202). Implementation of this scheme and introduction of the new residential use will fundamentally and permanently alter the dynamic of the site. Subsequently, the Applicant is seeking to deliver a residential-led conversion of the other two buildings, which would be in keeping with the evolving use of the site.

#### **Planning History**

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2.16 The site has been subject to various planning applications and are summarised in Table 2.1 below, with a full planning history in Appendix 1.

**Table 2.1 Summary of relevant applications**

Location	Reference	Description	Date
Hayes Park Central and South Buildings	12853/APP/2020/2980	Internal office refurbishment of Hayes Park Central and South including removal of the non-original partitions, re-instatement of the South Building's reflecting pool and refurbished entrances. External elevation and roof refurbishment of both buildings including cleaning and repair works, replacement of non-original glazed double doors and other works to the South building's glazed curtain wall system (Application for Listed Building Consent)	Granted – 09/02/2021
Hayes Park South Building	12853/APP/2010/2186	Internal alterations to include overpanel to doors, new access door, replacement fire door and replacement skirting to the reception area (Application for Listed Building Consent.)	Granted – 15/11/2010
Hayes Park South Building	12853/APP/2010/277	Internal alterations to existing staircases and alterations to front entrance (Listed Building Consent)	Granted – 20/04/2010
Hayes Park	12853/APP/2000/675	Creation of new vehicular access to Hayes park from proposed roundabout on Hayes end road, closure of existing access from Hayes end road and associated landscaping, signage and lighting	Granted – 06/07/2001
Hayes Park South Building	12853/W/96/1667	Refurbishment of existing administration and research buildings for office use, the erection of a new office building and decked car park (involving the demolition of Field House and garden walls), realignment of internal road and provision of car parking and landscaping to individual buildings	Granted – 10/08/1998
Hayes Park South Building	12853/X/96/1670	External and internal alterations to administration and research buildings and demolition of a former market garden wall (Application for Listed Building Consent)	Granted – 10/08/1998

**Pre-Application Advice (September 2022 – February 2023)**

- 2.17 In advance of submitting the planning application, the Applicant has engaged in extensive formal pre-application discussions with the LBH across four meetings on 20<sup>th</sup> September, 7<sup>th</sup> December 2022 and 6<sup>th</sup> and 21<sup>st</sup> February 2023 (ref. 12853/PRC/2022/156, ref. 12853/PRC/2022/262, ref. 12853/PRC/2023/21), with feedback received from planning officers on the principle of development, heritage, proposed landscaping, design, and other matters. The pre-application process has been highly constructive and collaborative, and the proposals have evolved in response to the feedback received, as outlined in the Design and Access Statement and this Planning Statement.

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2.18 The Applicant has also undertaken extensive collaborative discussions with the Greater London Authority (GLA), Historic England (HE), the Twentieth Century Society and a number of other key stakeholders.

2.19 A summary of pre-application feedback across different meetings is grouped under issues of discussion below.

### **Land Use**

2.20 Within the first pre-app meeting, the loss of employment floorspace was established with officers to be acceptable. Full marketing and other supporting evidence was presented at this meeting and has also been submitted as part of the application.

### **Optimum Viable Use**

2.21 Following the initial pre-application meeting, an exercise to establish the Optimum Viable Use of the site as residential use was undertaken, considering policy matters, viability, practical requirements, and the scale of harm to the listed buildings. The principle of residential as the Optimum Viable Use for the buildings was subsequently agreed prior to the second pre-application meeting.

### **Heritage**

2.22 Heritage was a highly significant issue throughout the pre-application process, generating much constructive dialogue between officers and the Project team.

2.23 The first meeting focussed on the subdivision of internal walls, the proposed balconies, the original sunken appearance of the building, duplex typologies, cut-out terraces and the lightwell introduction in Hayes Park Central, and the physical interventions required for residential use such as ventilation, fireproofing and insulations. Officers identified harm as less than substantial at the higher end of the scale at this stage.

2.24 The constructive feedback provided from officers throughout the process enabled the scheme to evolve and address any potential concerns. For example, measures such as reintroducing darker glazing to the curtain walling and improving the 1990s alterations to the ground floor at Hayes Park Central were suggested and have been incorporated in the submitted Proposed Development.

### **Housing Mix**

2.25 From the initial pre-app meetings, officers emphasised the importance and the need in the borough for family homes, and that the proposals should seek to deliver as close as possible to the policy

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target of 20%. The Applicant fully recognises this and has sought to deliver a variety of new homes that would be suitable for families, both in terms of conventional 3 bedroom homes, and oversized 2 bedroom homes with ancillary spaces.

### **Design and Layout**

- 2.26 The Project Team has worked with officers to optimise the internal layouts of the buildings throughout the pre-application process, to ensure a high quality of residential amenity throughout. This has included affording consideration to daylight and sunlight at the earliest stages through the design, as well as considering overheating and accessibility as key principles for achieving this.
- 2.27 Various design responses have been developed in response to pre-application feedback, to ensure these qualitative matters were improved, including provision of dual aspect scissor flats, further details of which are included within the DAS.
- 2.28 Ongoing engagement on design interventions to the buildings, including new curtain walling and balustrading, has been undertaken as part of the pre-application process and incorporated within the final designs.

### **Landscaping**

- 2.29 Officers were supportive of the landscaping approach, developed over the course of the pre-application process, with the Applicant taking on board advice to explore Bunshaft's original intentions.
- 2.30 The provision of a new 'Garden Square' as a heritage benefit was supported, with ongoing engagement on the scale of this element and proposed materiality. Cut-outs were also supported, with advice to ensure that this did not overtly impact upon the appearance of Hayes Park Central and Hayes Park South as two storey buildings, with the original sunken ground floor level designed to minimise impact upon the Green Belt. Ongoing engagement with officers addressed the matters raised.

### **Private and Communal Amenity Space**

- 2.31 At the initial pre-application meeting, officers recommended that based on the quantum of units proposed, Local Plan policy would require a minimum of 2,920sqm private amenity space for new homes. Following ongoing discussions, officers noted the constraints provided by the Listed Buildings in terms of private amenity space and advised that a planning justification would have to be provided to support communal provision of private outdoor space, or any private amenity space shortfall. This has been provided within this submission.

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- 2.32 It was also suggested that any submission would need to demonstrate the security of proposed amenity space, particularly the private gardens at ground level. This has been addressed within the supporting submission.
- 2.33 Internal alterations proposed to the buildings to provide communal amenity space were supported. The provision of communal external amenity space across the site is supported by officers, including the introduction of new Garden Square, which should be landscaped in keeping with the pastoral setting of the site with additional planting and greening. The principle of a pastoral meadow landscape with occasional naturalistic play equipment, to be located to the rear of the buildings, was supported in principle subject to a detailed methodology provided at application level and a level of provision in the line with the GLA's playspace calculator.

### **Transport**

- 2.34 Matters relating to the Transport Strategy for the scheme were all addressed within the initial pre-application meeting and taken on board by the project team. Officers expressed that any proposals for intensification of the Site for residential use must seek to encourage sustainable movements in and out of the Site requiring upgrades within the vicinity of the Site to ensure sustainable travel is achieved. Local footpaths should be upgraded to provide better connection to Uxbridge Road, the town centre and local schools. Officers also stated that cycle parking should be integral to the buildings.

### **Historic England Feedback**

- 2.35 Pre-application engagement was undertaken with Historic England, who raised no objection to emerging proposals. HE generally commended the depth of research and sensitively considered interventions into the heritage asset which would ultimately extend the lifecycle of the building by repurposing for an optimum viable use. HE also identified a range of important heritage benefits that the scheme would deliver.

### **Twentieth Century Society Feedback**

- 2.36 Pre-application engagement was carried out with the Twentieth Century Society. In their comments and responses, the society commended the applicant for putting together a carefully prepared and well-intentioned scheme that was well handled, sensitive and respectful of the original building.
- 2.37 The only concern expressed by the society related to balcony detailing and proposed railings. Reflecting comments from LBH officers and Historic England, constructive comments were made over the design and use of these features. Details of these changes were suggested to be crucial to the success of the final project.

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## Community Engagement

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2.38 This planning application is accompanied by a Statement of Community Engagement, which sets out the steps that have been taken to ensure that interested parties are familiar with proposals. The following engagement activities have been undertaken and are discussed further within the supporting Statement:

- A community leaflet delivered to over 803 local homes and businesses with an outline of the proposal and a consultation email to receive feedback and any enquiries about the site.
- A dedicated consultation website for responses - [www.hayesparkconsultation.com](http://www.hayesparkconsultation.com)
- A second community leaflet was delivered to the same 803 local homes and businesses, directing to the consultation website and a consultation email address and phone number to receive feedback and any further queries in relation to the proposal.
- Contact with ward councillors informing them of the proposals, notifying them when the consultation would commence.
- Positive engagement with the Church Commissioners who own the land adjoining the site.

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### 3. PROPOSED DEVELOPMENT

3.1 This planning application seeks full planning permission and listed building consent to change the use of the existing office buildings to provide new homes. The proposals involve the refurbishment and repurposing of the two listed buildings, to bring them back into a viable use, alongside improvements and changes to the landscaping. No additional massing is proposed to the buildings as part of the development proposals.

3.2 The description of development is as follows:

*Change of use of the existing buildings to provide new homes (Use Class C3), together with internal and external works to the buildings, landscaping, car and cycle parking, and other associated works.*

#### Change of Use

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3.3 The proposed development would result in the loss of 12,655 sqm of office floorspace (Class E), to provide 124 new residential homes (Class C3). The proposals do not seek to alter the layout of the site. Instead, the buildings will remain in their current location and be repurposed to provide the new residential housing.

#### Residential Use

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3.4 The proposed development comprises a total of 124 residential homes, including 52.5% 1-bed homes, 33% 2-bed homes, 13.7% 3-bed homes and 0.8% 4-bed homes.

3.5 The proposed development would provide the following mix of homes.

**Table 3.1 Proposed Dwelling Mix**

Unit Type	Number of Homes	Percentage (%)
1B1P	25	20.2%
1B2P	40	32.3%
2B3P	4	3.2%
2B4P	37	29.8%
3B5P	10	8.1%
3B6P	7	5.6%
4B7P	1	0.8%



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### **Affordable Housing**

- 3.6 Following on from the results of a detailed Financial Viability Assessment by Aspinall Verdi, it has been found that the proposed development cannot viably provide any affordable housing. As such, no affordable housing is proposed as part of the scheme.

### **Accessible and Adaptable Dwellings**

- 3.7 All residential homes have been designed to be accessible in accordance with the Building Regulations.
- 3.8 Across the entire development 16 homes, or 12.9% of homes are built to M4(3) standards, while the remaining 108 homes are built to M4 (2) standards or 87%.

### **Private Amenity Space and Open Space**

- 3.9 All homes have direct access to a private amenity space, whether it is a balcony, terrace or a garden space. The ground level private gardens, which are described on the earlier page, provide ground level external amenity space with access via a large full height sliding door. To the upper floors the proposal looks to reuse the existing concrete overhang to form the linear balconies around the edge of the building providing a total of 1,183sqm private external amenity space.
- 3.10 The proposals comprise a total of 2.48ha of open space. It is proposed that the open space would offer a range of amenity to occupiers, including the provision of a pastoral parkland and a playground.
- 3.11 The playspace proposed would comprise various offerings based on age groups and types of children's play offering outside of a formal play space as required by London planning policy. The following lists the various offerings for play space that make use of abundant open space throughout the site;
- A dedicated play space of 950sqm would be provided to the north east corner of the site offering facilities for 0-17 year olds.
  - Informal play and exercise opportunities are provided to the north of the site including an arrival space to the north providing areas of hard standing and seating for various users to use in a non-prescriptive way. Extending to the west is a walking and jogging loop circling HPC with trim trails forming part of this route for younger children.
  - Exercise equipment for age groups 15 years and up is provided to the north west of the site such as pull and dip bars.
  - The landscape to the west of the buildings would provide informal opportunities for play and exploration within the pastoral setting. Mown paths meander through the landscape to pique

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the interest of children and adults, forming a network of walking routes, secondary trails and pockets of open lawn and meadow.

- Open areas of mown grass would be provided for non-prescriptive play, including ball games, frisbee throwing and exercises that do not require equipment such as yoga.

- 3.12 The proposed private amenity space varies for different dwelling types across the site and comprises 1,183sqm in total. Apartments at ground floor have courtyard gardens created through cut-outs in the landscaping. The proposed private amenity balconies are provided to some flats at upper floor levels. 796sqm communal external amenity space is proposed adjacent to the flats.

#### **External communal amenity**

- 3.13 The proposed development includes a new internal courtyard for HPC, which would act as a new communal amenity space. The existing interior courtyard in HPS would receive interventions to maximise the use of the space as a communal outdoor amenity space. This includes reintroduction of a reflective pool and central tree features that were part of the original designs of Gordon Bunshaft.
- 3.14 Also proposed to provide external communal amenity is the Garden Square to the north of the site. The space would function as a forecourt for the local community, as opposed to an urban square that would typically be designed for high footfall.

#### **Internal communal amenity**

- 3.15 There is 412sqm of internal communal amenity proposed across the development. Large residential lounge spaces with co-working facilities are provided across both ground floors allowing opportunities for social and communal gatherings. At upper levels, four winter-garden / lounge areas are provided on both the east and west sides of HPS.
- 3.16 A number of storage facilities are also located around the building. These could allow residents to hire storage facilities within Hayes Park.

#### **Design and Materiality**

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- 3.17 The main interventions being proposed include:
- Creation of central courtyard in HPC complete with new landscaping and new internal facades;
  - Creation of communal lounge, co-working and winter garden spaces internally;

- Provision of safety railings to create balconies to upper floors;
- Cut-outs in the landscape to create “garden flats” at ground floor;
- Reinstatement of reflective pool with trees and greenery to HPS; and
- Cleaning of exterior facades and materials to reinstate original finishes.

3.18 Full details of the proposed design approach and materiality can be found within the Design and Access Statement.

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### **Access, Servicing and Parking**

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#### **Access**

3.19 Proposed access strategy reuses the existing access points and estate road either from Park Lane to the east or Hayes End Road to the west. Each vehicular entry point would be gated, with residents only access controlled by fobs.

#### **Car Parking**

3.20 124 car parking spaces (111 standard and 13 accessible) are proposed with the majority of parking located in the existing facility to the west of the site with subsidiary parking of 16 spaces to the northern boundary of the site and 18 more spaces to the eastern boundary. It is proposed to deliver EV charging points to 20% of parking spaces, with passive provision to the remaining 80%. Disabled parking space are dispersed across the site and placed in greater proximity to the buildings with 3 spaces serving HPN and 14 spaces serving HPC from the east proposed throughout the site.

#### **Cycle Parking**

3.21 Cycle storage would be provided across the site, with 203 stands for residents and 4 stands for visitors. 124 stands are located within ground floor cycle stores integral to Hayes Park South and the remaining 79 stands are located within a ground floor store integral to Hayes Park Central. 4 visitor cycle stands are proposed externally, in an area with good natural surveillance.

3.22 Cycle storage is provided across a range of facilities with 150 spaces in 2 tier stackers, 10 spaces in accessible Sheffield stands and the remaining 43 in regular Sheffield stands. Approximately 5% of cycle storage is accessible.

#### **Servicing**

3.23 The proposed servicing and access routes look to reuse the existing access points and estate road. The buildings and parking on site would be accessed via the existing estate loop road. This is either

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entered from Park Lane to the east, or Hayes End Road to the west. Both routes connect to Uxbridge Road, which runs to the south of the site.

#### **Refuse and Recycling**

- 3.24 Each dwelling would have a dedicated space to accommodate the Council's bin requirements. The proposed refuse and recycling strategy is outlined within Design and Access Statement and OWMP, submitted alongside this planning statement.
- 3.25 Refuse stores are located on the eastern ground floor of each building where vehicular access is possible within the estate and where they would have the least visual impact. The stores are accessed via the central core through a protected lobby.

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## 4. PLANNING POLICY

4.1 Section 38(6) of the Planning and Compulsory Purchase Act requires planning applications to be determined in accordance with the Development Plan unless material considerations indicate otherwise. This section identifies the principal planning policies which have informed the development proposals, and which provide the context for the consideration of this planning application, as well as other material considerations.

4.2 The current LBH Development Plan consists of:

- The London Plan (2021)
- The London Borough of Hillingdon Local Plan Part Two (2020)
- The London Borough of Hillingdon Site Allocations and Designations (2020)
- The London Borough of Hillingdon Local Plan Part One (2012)

4.3 Other material considerations include:

- National Planning Policy Framework (2021)
- National Planning Practice Guidance (2021)
- The Mayor's Housing Supplementary Planning Guidance (SPG)
- The Mayor's Play and Informal Recreation Supplementary Planning Guidance (SPG)
- The London Borough of Hillingdon Planning Obligations Supplementary Planning Document (SPD)

### **National Planning Policy**

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4.4 The National Planning Policy Framework (NPPF) provides the planning policies for England and how these should be applied. This section provides an overview of the Government's national planning policy and guidance that is relevant to the proposed development.

**Table 4.1 Relevant National Planning Policy**

Policy Details	Policy Synopsis
<b>Achieving Sustainable Development</b>	<p><b>Paragraph 7</b> states that the purpose of the planning system is to contribute to the achievement of sustainable development.</p> <p><b>Paragraph 8</b> of the NPPF highlights that achieving sustainable development has three overarching objectives – an economic, a social and an environmental objective, which are interdependent and need to be pursued in mutually supportive ways:</p> <ul style="list-style-type: none"> <li>• an economic objective – to help build a strong, responsive and competitive economy;</li> <li>• a social objective – to support strong, vibrant and healthy communities; and</li> <li>• an environmental objective – to protect and enhance our natural, built and historic environment.</li> </ul> <p><b>Paragraph 9</b> of the NPPF states that planning decisions should play an active role in guiding development towards sustainable development solutions, but in so doing, should take local circumstances into account, to reflect the character, needs and opportunities of each area.</p>
<b>Decision Taking</b>	<p><b>Paragraph 11</b> states that plans and decisions should apply a presumption in favour of sustainable development, and identifies how decision taking should be undertaken.</p> <p><b>Paragraph 12</b> highlights that local planning authorities may take decisions that depart from an up-to-date Development Plan, but only if material considerations in a particular case indicate that the Plan should not be followed.</p>
<b>Delivering a sufficient supply of homes</b>	<p><b>Paragraph 60</b> states that to support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed.</p> <p><b>Paragraph 64</b> states that to support the re-use of brownfield land, where vacant buildings are being reused or redeveloped, any affordable housing contribution due should be reduced by a proportionate amount.</p>
<b>Promoting sustainable transport</b>	<p><b>Paragraph 104</b> states that transport issues should be considered from the earliest stages of plan-making and development proposals, so that the impact upon local transport networks can be addressed and opportunities to promote walking, cycling and public transport use are maximised.</p>
<b>Making effective use of land</b>	<p><b>Paragraph 119</b> states that planning policies and decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.</p> <p><b>Paragraph 123</b> states that Local Planning Authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs.</p>
<b>Protecting Green Belt land</b>	<p><b>Paragraph 137</b> notes that the Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.</p> <p><b>Paragraph 148</b> outlines that when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt.</p>

<b>Meeting the challenge of climate change, flooding and coastal change</b>	<b>Paragraph 169</b> notes that Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should take account of advice from the lead local flood authority, have appropriate proposed minimum operational standards and have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development and where possible, provide multiple benefits.
<b>Conserving and enhancing the natural environment</b>	<b>Paragraph 174</b> states that planning decisions should contribute to and enhance the natural and local environment by, <i>inter alia</i> , minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures; and preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should, wherever possible, help to improve local environmental conditions such as air and water quality.
<b>Conserving and enhancing the historic environment</b>	<p><b>Paragraph 194</b> requires an applicant to describe the significance of any heritage assets affected by development proposals, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance.</p> <p><b>Paragraph 199</b> states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.</p> <p><b>Paragraph 200</b> states that <b>any</b> harm to the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification.</p> <p><b>Paragraph 202</b> states that where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.</p> <p><b>Paragraph 208</b> states that the benefits of proposals which would depart from the Development Plan but secure the future conservation of a heritage asset should be weighed up against the impact of departing from those policies.</p>

#### LBH Local Plan Part One (2012)

- 4.5 The Hillingdon Local Plan Part One sets out the key strategic policies underpinning the planning strategy and vision for Hillingdon for the period 2011-2026 and was formally adopted in November 2012. A key component of the Council's vision is the delivery of new housing, employment and infrastructure within the Borough, whilst also safeguarding and enhancing heritage assets and combating climate change.
- 4.6 The policies in Table 4.2 are relevant to the proposed development.

**Table 4.2 Relevant Local Plan Part One Policies**

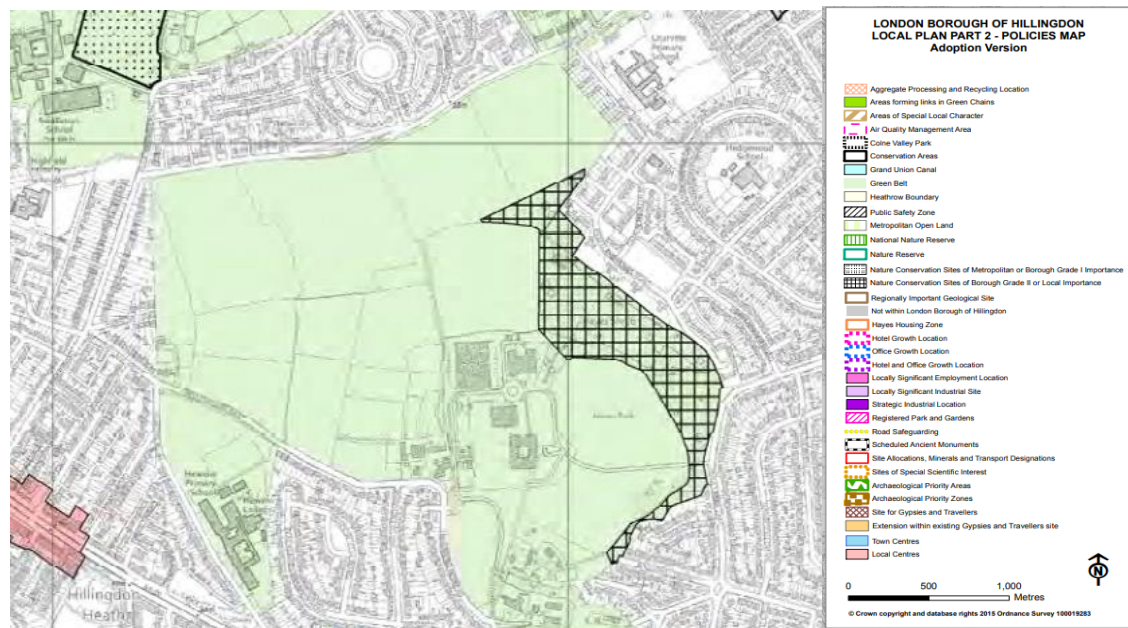
<b>Policy Number</b>	<b>Policy Synopsis</b>
Policy H1	Meeting and exceeding the Council's minimum strategic housing requirements of 6,375 new homes between 2011 and 2026.
Policy H2	Maximising the delivery of affordable housing, ensuring that the affordable housing mix on proposed development reflects housing needs in the borough, particularly the need for larger family homes.  The Council's Economic Viability Assessment suggests that 35% of all new homes should be affordable across the plan period, with an indicative tenure mix of 70% housing for social rent and 30% intermediate housing.
Policy HE1	Conserving and enhancing Listed Buildings and actively encouraging their reuse.
Policy EM1	Addressing climate change mitigation through the development process, including through implementation of renewable energy measures where appropriate.
Policy ESQM	Maintaining the existing extent and function of the Green Belt within the Borough.
Policy EM6	Ensuring new development makes provisions for Sustainable Urban Drainage Systems (SuDS) unless demonstrated to be unviable.
Policy EM7	Protecting Nature Conservation Sites of Borough Grade II and Local Importance from any adverse impacts or loss of biodiversity as a result of new developments, with the provision of further biodiversity desirable.
Policy EM8	Ensuring that new major development within Air Quality Management Areas seeks to demonstrate Air Quality Neutrality and delivers measures to improve Air Quality, such as sustainable transport and planting, where appropriate.

**LPA Local Plan Part Two (2020)**

- 4.7 The Hillingdon Local Plan Part Two sets out the detailed development management policies for the Borough that will form the basis of the Council's decisions on individual planning applications. It was formally adopted in January 2020.
- 4.8 As outlined on the excerpt from the Local Plan Policies Map shown below, the site is located within the Green Belt. Adjacent to the site is a Nature Conservation Sites of Borough Grade II and Local Importance.



**Table 4.3 Local Plan Designations**



4.9 In addition to the above, the policies in Table 4.4 are relevant to the proposed development.

**Table 4.4 Relevant Local Plan Part Two Policies**

Policy Number	Policy Synopsis
Policy DME2	The loss of employment floorspace outside of designated employment areas will usually be permitted if the site is vacant and unsuitable for employment use because of its size, shape, location, or unsuitability of access. Marketing evidence will be required to demonstrate there is no realistic prospect of the site being reused for employment purposes.
Policy DMH2	Ensuring that the unit mix within new residential development aligns broadly with the Council's most up-to-date housing needs, which presently comprises a substantial borough-wide requirement for larger affordable and private market family homes.
Policy DMH3	Allowing for the change of use of office buildings to residential homes providing factors such as sufficient amenity space, public realm and design interventions can be delivered sensitively to ensure a good quality of accommodation.
Policy DMH7	Providing on-site affordable housing on schemes of 10 homes or more, at the tenure split outlined in Local Plan Policy H2, whilst seeking to maximise delivery of affordable family housing to meet identified need.
Policy DMHB1	Protecting heritage assets from harm through development and ensuring that any proposals involving Listed Buildings sustain and enhance their significance and deliver the optimum viable use for the site.
Policy DMHB2	Ensuring that applications involving the change of use of Listed Buildings will retain the significance and value of the asset and are true to their original fabric, character and layout. Such details should be considered within a supporting Heritage Statement.
Policy DMHB11	Ensuring that good design is integral to all new development coming forward, with a focus on protecting and enhancing the local environment and harmonising with surroundings.

Policy Number	Policy Synopsis
	There is also a focus on ensuring that a robust approach to quality of residential amenity, daylight/sunlight considerations and refuse arrangements is provided within new development proposals.
Policy DMHB14	Requiring the retention and enhancement of existing on-site biodiversity as part of new development proposals, as well as a hard and soft landscaping scheme suitable to the character of the area.
Policy DMHB15	Ensuring that new development complies with the Secured By Design Principles and delivers a safe, inclusive residential environment as part of the implementation of good design principles. This includes maximising defensible space, provision of natural surveillance and, where appropriate, CCTV and lighting.
Policy DMHB16	Requiring new residential development to comply with Nationally Described Space Standards for internal floorspace.
Policy DMHB18	Establishing the Council's standards for private residential amenity space. Studio and one-bed flats require 20sqm, two-bed flats require 25sqm and 3+bedroom flats require 30sqm. Furthermore, balconies should be at least 1.5 metres in depth and 2 metres in width.  New developments involving Listed Buildings should focus provision of private open space on the enhancement of the street scene and the character of the buildings.
Policy DMHB19	Establishing the requirements for provision of children's play space on major development sites, through calculation of a child yield for the new proposals and a subsequent provision of 10sqm of plays pace per child.
Policy DMEI1	All major development should incorporate living roofs/walls into the development. Suitable justification should be provided where living walls and roofs cannot be provided.
Policy DMEI2	Establishing the requirement for all new major development to demonstrate through provision of an Energy Assessment how carbon dioxide emissions will be limited and requiring an off-site financial contribution for any shortfall against Zero Carbon targets.
Policy DMEI3	Establishing the requirement for major developments are required to be designed to be able to connect to a Decentralised Energy Network and in some cases, offer provision to connect to future planned networks if located within close proximity.
Policy DMEI4	Establishing the approach towards development in the Green Belt that is enshrined in national legislation.
Policy DMEI7	Outlining the requirement of new major development to retain and enhance existing features of biodiversity and avoid any loss or harm.
Policy DMEI14	Ensuring that developments strive to be 'Air Quality Neutral' and consider risks caused by pollution and emissions. Developments in Air Quality Management Areas should seek to contribute towards improvement.
Policy DMCi4	Outlining the requirement for new major residential development to make provision for new or enhanced open space, for the benefits of residents.
Policy DMCi5	Establishing that for new major residential development, standards of 10sqm per child within London Plan Guidance and Hillingdon's child yield will apply and equipped playspace should be within 400 metres of the building.
Policy DMT1	Outlining the requirement for sustainable transport to be at the heart of all new development proposals and that the transport impacts of new larger

Policy Number	Policy Synopsis
	developments are robustly considered and set out within an accompanying Transport Assessment and Travel Plan.
Policy DMT2	Outlining the requirement for the highways impacts of development proposals to be considered, including matters relating to road safety, accessibility, amenity impacts including congestion and pedestrian and cyclist safety.
Policy DMT4	Establishing considerations in respect of public transport provision as part of new developments and that developers may be required to input towards new public transport and sustainable transport infrastructure.
Policy DMT5	Specifying local standards for maximum cycle parking for new residential development, these being 1 per studio, 1 or 2 bed unit and 2 per 3+ bed unit.
Policy DMT6	Specifying the local standards for maximum car parking for new residential development, these being: 1 space per 2 studio flat; 1 - 1.5 spaces per 1-2 bedroom flat; and 2 spaces per 3+ bedroom flat with all spaces allocated to dwellings. Visitor parking is also required, to be agreed with the Council.

### The London Plan (2021)

- 4.10 The London Plan comprises part of Hillingdon's Development Plan and provides a strategic planning policy framework guiding development within the London city region on matters relating to housing, the economy, the environment, transport and social infrastructure. It was adopted in March 2021. The policies the policies in Table 4.5 are relevant to the proposal.

**Table 4.5 Relevant London Plan Policies**

Policy Number	Policy Synopsis
Policy GG2	Establishing the need to make the best use of land, including respecting the protection of the Green Belt and creating new urban greening and securing net gains in biodiversity on site.
Policy GG4	Ensuring the delivery of new homes across London, with a strategic target of 50% affordable homes and the creation of good housing with sustainable design at the forefront.
Policy GG6	Ensuring that energy and sustainability and combatting climate change is at the forefront of new development as London moves towards becoming a zero-carbon city by 2050.
Policy D5	Outlining the expectations that the highest standards of accessible and inclusive design be considered at the earliest stages of development and incorporated accordingly.
Policy D6	Ensuring that Nationally Described Space Standards for new residential dwellings be adhered to and single aspect dwellings should be minimised where possible. Private external amenity space should also be delivered through either a garden, terrace, roof garden, courtyard garden or balcony.

Policy Number	Policy Synopsis
Policy D7	Ensuring that 10% of new homes within a development are 'wheelchair user dwellings' as per Part M4(3) of Building Regulations and all other homes are 'accessible and adaptable dwellings' in line with Part M4(2).
Policy D11	Ensuring that all new development incorporates measures to design out crime and ensure the safety of its end users.
Policy D12	Ensuring that new developments are designed to incorporate the highest standards of fire safety and the wellbeing of future users, with major developments supported by a Fire Statement.
Policy D14	Ensuring that new developments should ensure that noise impacts are considered and suitably managed and mitigated.
Policy H1	Establishing a ten-year housing target for Hillingdon of 10,830 between 2019/20 and 2029/30, requiring delivery of 1,083 per annum. A requirement of 66,000 additional homes per annum across London is also identified within Paragraph 4.1.1
Policy H4	Setting out the strategic target for 50% of all new homes across London to be genuinely affordable, to meet the established need for 45,000 affordable homes per annum and to be delivered in line with the Mayor's Threshold approach in policy H5.
Policy H5	Establishing the threshold approach for delivery of affordable housing in London, including the requirement for 35% affordable housing on privately owned development sites. Part F states that sites which do not meet this threshold must follow the Viability Tested Route.
Policy H10	Outlining that appropriate unit mixes should be established on the basis of identified housing need within each borough.
Policy S4	Establishing the requirement for new residential development to provide 10sqm of playspace for children of all ages.
Policy E1	Outlining, within Part H, that the change of use of surplus office floorspace to residential use is acceptable, providing that it can be demonstrated that it is no longer in demand from commercial occupiers.
Policy HC1	Establishing within Part C, that development proposals involving designated heritage assets should ensure that their significance is conserved and their surroundings are sensitively respected.
Policy G2	Reinforcing the policy enshrined at national level which protects the Green Belt from 'inappropriate development'.
Policy G5	Establishing that new residential developments should introduce on-site landscaping and greening measures to achieve an Urban Greening Factor score of 0.4
Policy G6	Outlining, inter alia, that new development should seek to ensure a positive impact on biodiversity and secure net biodiversity gain.
Policy S11	Establishing that all new development proposals should be Air Quality Neutral and propose measures to ensure that a scheme does not contribute towards further deterioration of existing poor air quality and does not create unacceptable risk of high levels of exposure to poor air quality.
Policy S11	Outlining that new major development should be Net Zero Carbon, reducing emissions in operation and minimising energy demand in accordance with the GLA's energy hierarchy. A minimum on-site reduction of at least 35 per cent beyond Building Regulations is required.

Policy Number	Policy Synopsis
Policy SI4	Outlining that new developments must demonstrate how overheating to new homes will be managed naturally, without relying upon air conditioning.
Policy SI7	Outlining the emphasis placed on Circular Economy principles within GLA Referrable applications and reducing waste as part of development.
Policy T2	Emphasising that Development Proposals should comply with the Mayor's Healthy Streets Approach, encouraging sustainable transport and facilitating walking and cycling journeys.
Policy T3	Outlining within Part E that development proposals should support uplifts to capacity, connectivity and other improvements to the bus network.
Policy T5	<p>Setting out the minimum cycle parking standards for new residential developments to encourage sustainable development as follows:</p> <ul style="list-style-type: none"> <li>• 1 space per studio or 1bed 1person dwelling</li> <li>• 1.5 spaces per 1bed 2person</li> <li>• 2 spaces for all other homes</li> </ul> <p>Long stay parking is required at a level of 2 spaces for 5 to 40 dwellings: and thereafter 1 space per 40 dwellings.</p>
Policy T6	<p>Establishing that car parking provision is to be applied in line with levels of existing and future public transport accessibility and connectivity, through maximum parking standards.</p> <p>Noting the future direction of travel, infrastructure for electric or Ultra-Low Emission vehicles is required, with at least 20% active charging facilities and passive provision for all remaining spaces.</p> <p>Sub policy T6.1 outlines that maximum parking standards for PTAL 0-2 sites in Outer London comprise between 0.75 and 1.5 spaces per 1-2 bed unit and 1-1.5 spaces per 3= bed unit.</p>
Policy T7	Outlining requirements for delivery and servicing arrangements to be robustly considered as part of major applications.

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## 5. PLANNING ANALYSIS

- 5.1 This section reviews the key planning considerations arising from the Proposed Development. It provides a reasoned justification for the Proposed Development in the context of relevant policy and the specifics of the site and its surroundings.

### **Principle of Development**

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#### **Loss of Employment Use**

- 5.2 The application proposes the change of use of two office buildings, previously in use as offices (Class E(g)(i)), to residential use (Class C3). The repurposing of vacant office buildings for alternative uses is supported within policy, as the site is not located within a designated employment area or one of the Borough's three core office locations for office floorspace growth, namely Uxbridge, Stockley Park and Heathrow Perimeter. Nevertheless, Policy DME2(C) of the LB Hillingdon Development Management Policies Document (2020) and Policy E1(I) of the London Plan (2021) require robust justification to support the loss of the employment floorspace.
- 5.3 As part of the preparation of Local Plan Part Two, the Council undertook a review of existing business parks and office accommodation throughout the Borough, designating a number of sites as Locally Significant Employment Locations (LESLs). Hayes Park was reviewed as part of this process and was not afforded any protection through this designation. This underpins the idea that other uses would be acceptable for the site, a principle established with officers within the first pre-application meeting, who accepted the loss of employment use.
- 5.4 Nevertheless, robust justification for the change of use is provided in line with Policy DME2, which outlines a number of criteria against which applications for loss of office can be assessed. In line with part B of this policy, the supporting Marketing Report notes that the site is unsuitable for future employment use for a number of reasons, including the size and shape of the buildings and the location of the site. Hayes Park Central has been vacant since September 2020 and Hayes Park South has been vacant since Summer 2017. This reflects a wider trend within the Borough, as Hillingdon has among the highest office vacancy rates at 15.1%, with 1.4 million square foot of unoccupied office space.
- 5.5 This lack of demand on this site is also evidenced within the supporting Marketing Report, which demonstrates that both buildings have been actively and rigorously marketed by Cushman and Wakefield since 2018, both via an online brochure distribution, direct targeting of companies and through online search engines.

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- 5.6 During this time there has been no serious interest from any potential occupiers. The primary reasons given were the out-of-town location, the size of the floorplates combined with the desire for larger companies to downsize, as well as the cost involved in bringing the buildings up to contemporary standards. Accordingly, it has been demonstrated through evidence of robust marketing over a period of four years, exceeding policy requirements, that the site is no longer suitable for commercial uses and the loss of office floorspace here is therefore acceptable.

#### **Principle of Residential Use**

- 5.7 With the principle of introducing alternative uses to the site established, residential use is considered to be the most appropriate. Discussions on residential use as the Optimum Viable Use of the two Listed Buildings is undertaken later in this statement, but within the context of housing need, the arguments for introducing new homes to the site are strong.
- 5.8 There is a defined need for new housing within the borough, as well as the wider London city region. Policy H1 of the Local Plan Part One (2012) outlines a minimum strategic housing requirement of 6,375 new homes between 2011 and 2026. However, Table 4.1 of the London Plan (2021) cites a need of 10,830 completed new homes between 2019/20 and 2029/30. Furthermore, the Mayor's Strategic Housing Market Assessment (SHMA) has identified a need for 66,000 additional homes per annum across London, as outlined within paragraph 4.1.1 of the London Plan.
- 5.9 As outlined within Chapter 4 of the supporting Strategic Economic Case Report, prepared by Icen Projects and submitted in support of this application, the housing need across London is even more acute. The 2021 London Plan was adopted under 'transitional arrangements' whereby housing need was calculated using the approach in the 2012 NPPF and 2014 PPG, meaning the standard method instead shows a need across London for 86,000 homes a year, including a need for Hillingdon of 2,047 dwellings per annum. This significantly exceeds the targets set out in Table 4.1 of the London Plan, which equates to 1,083 homes per annum.
- 5.10 Further to this, the report notes that housing delivery in London since 2013 has averaged out at 33,400 homes per annum, meeting significantly less than the annual requirement. Accordingly, as reflected in recent planning appeal decisions both within the Borough<sup>1</sup> as well as in Hounslow<sup>2</sup> and Brent<sup>3</sup>, the acute housing shortage across the city region has led to a pan-London approach to housing need being adopted with the benefits of new housing delivery to the wider city region providing a material consideration in the determination of planning applications.

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<sup>1</sup> APP/R5510/W/21/3279371, 217 High Street, Yiewsley, West Drayton, January 2022

<sup>2</sup> APP/F5540/V/19/3226900, Land at 40 & 40A High Street, March 2021

<sup>3</sup> APP/T5150/V/21/3275339, Wembley Park Station Car Park, February 2022



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- 5.11 This applies in Local Planning Authorities where a Five-Year Housing Land Supply can be demonstrated. Within Hillingdon's "5 Year Supply of Deliverable Housing Sites" report dated March 2022; a Housing Land Supply of 7.2 years is identified. Whereas Icen's high-level review of this position contests that this position is closer to 6 years, this is still a healthy housing land supply, but the precedent set by the appeal decision APP/R5510/W/21/3279371 in Yiewsley establishes that "given the demand for housing in the area and wider afield in London", additional homes within the borough provide a wider benefit. There is also the need, as outlined within paragraph 68b of the NPPF, for Councils to maintain a healthy housing land supply on a rolling basis for subsequent years. Accordingly, the provision of 124 new homes on a windfall site in this instance are considered to have significant benefits for the Borough and the wider London region and should be supported.
- 5.12 A further material consideration in support of residential conversion of the buildings is provided through the prior approval permission granted for the change of use of the adjacent Hayes Park North building from office to residential use under application 12853/APP/2021/2202. This prior approval will fundamentally and irrevocably change the characteristics of the Hayes Park site and with the loss of office use accepted in principle, there is a strong rationale that the introduction of residential use to Hayes Park Central and Hayes Park South is consistent with the emerging context of the site.
- 5.13 Overall, there is an extremely robust case for the residential conversion of Hayes Park Central and Hayes Park South, which would provide much needed new homes on a windfall site where there is no realistic prospect of commercial reuse. As such, the principle of residential-led redevelopment is considered compliant with the Local Plan, London Plan and the NPPF.

#### **Green Belt**

- 5.14 The site sits within the Green Belt, as outlined on the policies map in Figure 4.1. Paragraphs 137 and 148 of the NPPF specify the function of the Green Belt and the weight that is attributed to any harm to the Green Belt within development proposals. This is reinforced through Local Plan Part One Policy ESQM, policy DMEi4 of the Local Plan Part Two and Policy G2 of the London Plan.
- 5.15 The proposed development would not involve any new development within the Green Belt, with the most significant interventions being to external fabric of the listed buildings and the landscaping surrounding the two buildings, in particular the cut outs to open up the lower ground floors.
- 5.16 Paragraph 150(E) of the NPPF states that material changes of use within the Green Belt are acceptable, providing that "they preserve its openness and do not conflict with the purposes of including land within it". As no new built form is proposed within the site, the proposals are not considered to impact upon the openness of the Green Belt and should be considered compliant with the Development Plan and National Planning Policy.



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## Optimum Viable Use

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- 5.17 As outlined above, the principle of the loss of employment use from the site has been accepted by officers, as marketing evidence was provided at the outset, to meet policy requirements. However, the proposals would involve the repurposing of Listed Buildings for an alternative use, with associated structural interventions required to deliver this.
- 5.18 Accordingly, regard should be given to Paragraph 202 of the NPPF and the level of harm caused through associated interventions. The National Planning Practice Guidance (NPPG) identifies the importance, in decision making, of *“the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation”*. Optimum Viable Use (OVU) is cited within Paragraph 202 as where *“less than substantial harm”* to a heritage asset is found as a result of development proposals, this harm should be weighed with the public benefits of the proposal, of which securing OVU is considered as a benefit.
- 5.19 As such, an exercise to assess all uses within the Use Classes Order was undertaken by Iceni Projects whereby each use was assessed against the levels of interventions required to deliver each use, along with the policy position, the local need, market demand for the use and whether it would be sustainable in Transport terms.
- 5.20 An in-depth assessment of key uses which would benefit buildings of this size were considered, with various uses of interest raised by the Council, which were agreed not to be considered the OVU.
- 5.21 The OVU assessment process ultimately supported the conclusions that have since been accepted by the Council, these being that the introduction of residential homes to the buildings would provide the least harm to the heritage assets and therefore provide the OVU of the site. This position was accepted by the Council following the initial pre-application meeting.

## Housing Provision

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### Housing Mix

- 5.22 Policy H10 of the London Plan requires new residential developments to provide a range of unit sizes, based on a number of considerations. Part A(1) of this policy states that local evidence of need provides a key consideration, reflected subsequently in policy DMH2 of the Local Plan Part Two. Supporting paragraph 4.6 to this policy outlines that there is a substantial borough-wide need for larger affordable and private market homes, particularly three-bedroom properties.
- 5.23 The proposed development comprises 124 new homes across Hayes Park South and Hayes Park Central. The proposed housing mix comprises a mixture of homes ranging from studios to 4-bed flats and is outlined below:

**Table 5.1 Proposed Housing Mix**

Unit Type	Number of Homes	Percentage (%)
1B1P	25	20.2%
1B2P	40	32.3%
2B3P	4	3.2%
2B4P	37	29.8%
3B5P	10	8.1%
3B6P	7	5.6%
4B7P	1	0.8%

- 5.24 The proposed development is situated in an area that is characterised by predominantly larger residential homes. The Charville Ward profile (2019) outlines that 59.5%<sup>4</sup> of homes within the borough are semi-detached, with flats, maisonettes and apartments comprising just 18% of the housing stock within the ward. This is lower than the borough average (26.8%) and one third of the level across London (52.3%). Data from the London Development Database suggests that the Charville ward has seen amongst the lowest levels of housing delivery in the Borough since 2015.
- 5.25 Within the proposed development, there is a shortfall relative to the Council's stated need of 20% in the quantum of family housing proposed, with 14.5% of 3-bed and 4-bed homes proposed., Given the character of the area's housing stock and the comparative paucity of apartments, the proposed provision of 1-bed and 2-bed flats which comprise 85.5% of the proposed housing mix is considered appropriate to the housing need of the area and would help contribute towards creating a mixed and balanced communities. Furthermore, a high proportion of 2-bed 4-person homes are provided, with the sizes of these 19 family homes significantly exceeding minimum space standards. These homes provide excellent opportunities for young families to live at the site. Accordingly, the provision of family housing is considered to be closer to 30%.
- 5.26 This approach is supported by the supporting Housing Mix Report, prepared by Icen Projects. Marketing research has identified a ready supply of 3-bedroom family houses for sale within the area and the wider borough, with agents stating that family houses would be preferred by buyers to flats unless there was a significant cost saving. Furthermore, there is a demand for larger family homes which can be enlarged to accommodate multi-generational families, which is not feasible within a flatted development.
- 5.27 The proposed housing mix should also be considered within the context of the heritage constraints of the site. The sensitivity of the listed buildings does not allow for their extension, to increase the

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<sup>4</sup> [Charville Ward Profile \(1\).pdf](#)

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number of homes and thus, the quantum of family homes. As such, the Applicant and Project Team has delivered the most viable housing mix given these inherent constraints of the building. Combined with the fact that larger flats would provide a lower price per square foot than smaller flats and that it may be more difficult to sell larger flats at market rate, the provision of a higher quantum of 3-bed and 4-bed family homes would further impact upon a scheme which demonstrates a negative viability position. In the context of finding the Optimum Viable Use for the building, this is key consideration in ensuring that a deliverable scheme comes forward.

- 5.28 The higher quantum of good quality 1-bed and 2-bed homes would also provide the opportunity both for first time buyers and, importantly, for “right-sizing”. As noted within the supporting Housing Mix Report, 51% of households over 55 within the area have two or more spare bedrooms, due to a shortage of good quality homes to “allow residents to age in place for longer without moving them out of the community”. The proposed development would provide spacious, attractive and modern homes in a peaceful, landscaped setting and provide an invaluable option for such households to ‘right-size’, freeing up some of the hitherto underoccupied family homes which the Council’s assessment identifies as being urgently required.
- 5.29 Throughout the pre-application process, it has been demonstrated that the layouts of the site have been considered in detail, to maximise the provision of family housing relatively to local need and provide the optimised housing mix. Whereas the quantum of 3-bed and 4-bed family housing does not meet the preferred provision of 20% and thus does not align fully with Policy DMH2 of the Local Plan Part Two and the evidence base which underpins it, it has been demonstrated within this Planning Statement and the supporting reports that there are both material considerations and wider public benefits which establish the proposed housing mix as the optimal mix for the site.

#### **Affordable Housing**

- 5.30 Policy H2 of Local Plan Part One outlines the strategic target for 35% of new homes to be genuinely affordable, with the strategic target set at 50% within London Plan Policy H4. Policy DMH7 of the Local Plan Part Two states that development with a capacity of 10 new homes or more should maximise the delivery of on-site affordable housing.
- 5.31 London Plan Policy H5 sets a threshold approach to delivery of affordable housing, with a minimum requirement under Part B(1) of 35% on privately owned land. Part F states that schemes which do not propose a policy compliant quantum of affordable housing must follow the Viability Tested Route.
- 5.32 There are clear inherent constraints that come with the listed building status and wider context of the site. Given the importance of the external appearance of the buildings, together with the wider Green Belt status, the quantum of residential floorspace that can be provided on site is heavily constrained. It is not possible to extend the building, deliver more homes, and make the scheme more viable. Any increase in residential floorspace beyond that proposed in this planning application is not feasible

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since it would result in the overdevelopment of the site to the detriment of the setting of the listed buildings and the Green Belt. Additionally, the Applicant has had to design a scheme which has been dictated by the key features and constraints of buildings themselves, and importantly, delivers exemplar detail that will preserve the heritage value of the buildings.

- 5.33 The listed building status heavily constrains the ability to provide separate accesses and cores for separate residential tenures. Moreover, service charges for the market housing contained within the proposed development are considered to be too high for affordable housing tenants and as such the provision of shared stair/lift arrangements and communal inside spaces is neither practical nor viable.
- 5.34 A full viability assessment of the proposed development has been undertaken by Aspinall Verdi and this has been submitted with this application. In summary the viability assessment demonstrates that the proposed development cannot sustain a policy compliant level of 35% affordable housing and has no scope for provision of affordable housing on-site.
- 5.35 As the level of affordable housing is established through the viability route, the proposals are not considered contrary to policy and there is no reason why they should not be supported in this regard.

### **Heritage**

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- 5.36 The protection of heritage assets, including listed buildings, is enshrined within policy and legislation. Paragraph 200 of the NPPF requires any harm to the significance of a Listed Building, either through alteration or development within its setting, would require a clear justification. Paragraph 202 of the NPPF states that where a development proposal will lead to less than substantial harm to Listed Building, this should be weighed against the public benefits of the proposal including, securing its optimum viable use where a change of use takes place.
- 5.37 Policy HE1 of the Local Plan Part One encourages alternative uses for Listed Buildings, providing they are protected and enhanced, aligning with Policy HC1(c) of the London Plan and Policy DMHB1 of the Local Plan Part Two, which states that heritage assets should be protected from harm and development proposals sustain and enhance their significance, delivering the optimum viable use for the site. Policy DHMB2 establishes the criteria for such proposals to be considered acceptable.
- 5.38 As outlined above, the Optimum Viable Use for the site is considered to be a residential use. Pre-application discussions with Historic England and the Twentieth Century Society have also determined that the proposed change of use and the internal interventions to the building to deliver residential homes would be acceptable and have the ability to deliver a range of heritage benefits. Nevertheless, discussions between the Applicant's Heritage Consultants and officers at the Council have identified that the proposals are considered to result in a low level of 'less than substantial harm, thus required by paragraph 202 of the NPPF to be weighed against the public benefits provided by

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the scheme. Historic England have specifically identified the following key heritage benefits, which when combined with the wider benefits identified within this Planning Statement, would outweigh any harm:

5.39 In line with Policy DMHB2(b) of the Local Plan Part Two, a Heritage Statement has been prepared by Iceni and submitted in support of this application. This offers a robust justification of the proposed development and further outlines the key heritage benefits and public benefits of these proposals, which not only involve the reactivation and improved performance of two long-term vacant heritage assets, but a number of other benefits. The heritage benefits, identified by Historic England, include:

- The restoration of the original courtyard design to Hayes Park South, including the revealing of the reflecting pool and island
- The removal of unsympathetic accretions to the interior, and the revealing of the distinctive structural columns throughout.
- The enhancements to the external landscaping particularly the replacement of the unsightly roundabout with a new public square.
- The repair and cleaning of the concrete frame.

5.40 Historic England concluded in their pre-application response that the heritage benefits contribute to the public benefits of the proposed development and offer enhancement to the setting of the listed buildings in relation to paragraph 202 and 206 of the NPPF.

5.41 Overall, the proposals have, at their core, a heritage-led design approach which allows the two buildings to retain their significance and value and would be appropriate in terms of the fabric, historic integrity, spatial quality and layout of the buildings. The proposed development has been subject to ongoing engagement with Design and Conservation Officers at the Council, the GLA, Historic England and the Twentieth Century Society. As such, the proposals align with Local Plan Part One Policy HE1 and Part Two Policy DHMB2(a), as well as London Plan Policy HC1. Accordingly, these proposals are considered to comply with all local and national regulations and policy with respect to works requiring Listed Building Consent and the Optimum Viable Use for the site is established to be new homes.

### **Design and Materiality**

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5.42 High quality sustainable design is engrained in policy at all levels including the NPPF, the Council's adopted planning policy, and the London Plan.

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- 5.43 The NPPF sets out at Paragraph 124 that the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this. So too is effective engagement between applicants, communities, local planning authorities and other interests throughout the process.
- 5.44 Policy DMHB11 of the Local Plan Part Two states that good design is integral to all new development coming forward and the local environment should be protected and enhanced. Policy DMHB11(A)(ii) requires the use of high-quality materials as part of new developments.
- 5.45 The design and layout of the proposed development has been informed by an extensive 12-month engagement process, which has included pre-application discussions with officers from the Council, the GLA, Historic England and the Twentieth Century Society, to ensure the proposals meet the objectives of the national, and local design policies. This has been a collaborative process, whereby the Applicant has sought to respond positively to feedback throughout where possible.
- 5.46 The proposed development would not increase the height and massing to the three storey buildings and the external material changes would primarily relate to the glazing and balustrading. A new curtain walling system is proposed as replacement to the existing glazing, to ensure that the character of the buildings is respected, whilst contemporary building standards are met and overheating is minimised. Design and Conservation officer guidance has been heeded in the provision of sliding curtain walling providing access to private balconies. New balconies are proposed to all apartments at first and second floor levels, apart from to the corners of the building. It is proposed that mesh infill with simple railings and uprights would be used to ensure that the visual impact of new balconies is minimised.
- 5.47 As outlined within the supporting Design and Access Statement, prepared by SEW and Heritage, Townscape and Visual Impact Assessment, prepared by Icen Projects, structural and internal changes to both buildings are required, in order to ensure the highest quality of internal amenity and design. A new courtyard is proposed to Hayes Park Central, to create a new central space and allow new homes within the building to benefit from dual aspect. Structural alterations to allow for a change in the internal configuration to both buildings are proposed, with proposed openings to the fabric aligned with existing or historic openings where possible, to reduce any loss of original building fabric.
- 5.48 Cut outs to the landscape are also proposed as part of both the design of the proposals and the wider landscaping strategy, in order to maximise light to the ground floor residential homes and associated private amenity space whilst also limiting the external views. The approach to delivery of these cut outs including level changes required to address the building thresholds, is addressed within the supporting Design and Access Statement.

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- 5.49 Particular regard has been given to the importance of responding to the surrounding environment and views of the proposed development from key locations surrounding the site. A series of views have been identified through discussions with the Council's Design and Conservation Officers and the proposed development tested accordingly within the supporting Heritage and Visual Impact Assessment. Whereas the extent of external changes are limited, this approach allows the full impact of the proposed development to be studied from key viewpoints across the site. Therefore, the scheme has been designed to ensure that the proposed development serves to respect the setting of the wider site and the heritage of the site.
- 5.50 It is apparent that the heritage-led design approach to the scheme has delivered a series of high-quality proposals which respect the setting of the locality and the Listed Buildings, in accordance with policy requirements.
- 5.51 Overall, the supporting Design and Access Statement shows how this application demonstrates the level of consideration which has been given to ensuring that the design interventions and alterations proposed are sympathetic to the heritage and integrity of the two Listed Buildings and their settings. The Heritage and Visual Impact Assessment prepared by Icen Projects further outlines how the proposed interventions are sympathetic to the historic context to the buildings and the original intent behind Gordon Bunshaft's design, as well as the surrounding environment. Accordingly, the scheme demonstrates a high quality of design in line with policy DMHB11 of the Local Plan Part Two and Paragraph 124 of the NPPF and should be approved.

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### **Residential Quality and Amenity Space**

#### **Residential Quality**

- 5.52 Policy D6 of the London Plan and Policy DMHB16 of the Local Plan Part Two establish the space standards required for new residential homes and encourage dual aspect homes. Policies D5 and D7 of the London Plan require accessible and inclusive design to be incorporated into new developments and 10% of new homes to be designed to be wheelchair accessible homes.
- 5.53 Policy DMHB11(B) of the Local Plan Part Two requires full consideration to be given to daylight and sunlight and quality of residential amenity.
- 5.54 The internal layouts to the buildings have been carefully considered to maximise the quality of residential amenity. All homes meet Nationally Described Space Standards, in line with Local Plan and London Plan policies and national legislation. Furthermore, to meet an appropriate housing mix and work within the constraints of the Listed Buildings, a large number of homes on site significantly exceed minimum standards, in some cases up by up to 20%. This provides a high calibre of spacious, well-proportioned homes across the site, with some including additional home office spaces to respond to changing patterns of working from home.

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- 5.55 The internal layouts have been configured to maximise provision of dual aspect apartments, with the provision of duplex apartments within Hayes Park Central and duplex 'scissor' apartments within Hayes Park Central. Over 53% of the proposed homes are dual or corner aspect, with the majority of single aspect homes facing east or west. The 'scissor' apartments are integral to maximising the amount of dual aspect homes and ensuring that the majority of homes would maintain a predominantly south-facing aspect, whilst ensuring only 4% of new homes proposed are single aspect north facing.
- 5.56 Accordingly, the Daylight and Sunlight Assessment, prepared by Development and Light and submitted in support of this application notes that layouts have been fully optimised from an internal daylighting perspective given the heritage constraints of the Listed Buildings, with the development proposals ensuring 100% compliance with BRE Guidelines to all main living spaces. Overall, the quality of residential amenity is therefore considered acceptable.

#### **Private and Communal Amenity Space**

- 5.57 Policy D6(f)(9) of the London Plan requires provision of external amenity space through a garden, terrace, roof garden, courtyard garden or balcony to a minimum of 5 sqm. of private outdoor space for 1-2 person dwellings with an extra 1 sqm. for each additional occupant, unless there are higher standards within the Local Plan. Table 5.3 pursuant to Policy DHMB18(a) specifies more robust requirements ranging between 20sqm and 30sqm for one-bed to four-bed homes. Policy DMHB18(C) requires the provision of private open space in schemes involving Listed Building to enhance the streetscene and the character of the buildings on the site.
- 5.58 The proposed development includes the provision of a variety of communal spaces within the buildings, including courtyards and flexible spaces on all levels:
- 412 sqm of internal communal amenity (lobbies, communal space, and storage;
  - 796 sqm external communal amenity; and
  - 1,183 sqm private external space.
- 5.59 The private amenity space is provided either through balconies, or terraces or private gardens which utilise the landscaping cut-outs. Private amenity space would be provided to all new homes. Based on the adopted standards within the Local Plan, the proposed housing mix would generate a requirement for 2,865sqm of private amenity space across all new homes.
- 5.60 As noted above, the provision proposed would be lower than the policy requirements, However, the constraints of the existing Listed Buildings mean that the provision of private amenity space to individual homes inevitably falls short of standards. New balconies would only allow for a maximum



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depth of 1 metre, contrary to Local Plan Part Two Policy DMHB18(b) and Standard 27 of the Mayoral Guidance which advise a minimum depth of 1.5 metres. However, Policy DMHB18(b) also requires a minimum width of 2 metres, and the design proposals have sought to incorporate this into the layouts where possible.

- 5.61 Given the constraints of the buildings, and the clear need to take a heritage-led approach to the conversion of the buildings, the level of amenity space provision proposed is considered to be wholly acceptable with regards to the Council and GLA policy requirements, with the shortfall compensated through generous communal amenity space provision.
- 5.62 In addition to the private and communal amenity space provided to the buildings, there is ample communal amenity space available within the surrounding landscaping, benefitting from the openness of the setting of the buildings and the wider site. There 2.48 hectares of green space within the site boundary, which provides ample space for recreation and provides a truly unique parkland setting for future residents.
- 5.63 Within Hayes Park South, the reflective pool within the site courtyard provides a high quality of communal external amenity space, with internal lounge and coworking space also provided. Within Hayes Park Central, new internal courtyard area with sculpted seating is proposed.
- 5.64 A new 'Garden Square' is proposed to the north of the site, on the site of the existing roundabout. It is proposed to deliver a pedestrian-focused public space for residents to congregate, with seating and planting and considered landscaping. This further increases the high quality of amenity space to be delivered on site.
- 5.65 The overall provision of amenity space across the site is therefore considered to exceed policy requirements and, as illustrated within the supporting Design and Access Statement, would deliver an outstanding and truly unique residential environment.

### **Play Space**

- 5.66 Policy S4 of the London Plan and the supporting Mayoral Play and Informal Recreation SPG states that new residential development must provide 10sqm of play space for children of all ages. This is reflected within Policy DHMB19 of the Local Plan Part Two. The GLA's Population Yield Calculator identifies a yield of 42.8 children, requiring 427.9sqm of children's play space on the site, with 226sqm for 0–4-year-olds, 149sqm for 5-11-year-olds and 53sqm for 12-17-year-olds.
- 5.67 A Play Strategy has been developed and is included within the supporting Landscaping Strategy. Within the 2.48 hectares of green space within the red line boundary, it is proposed that 400sqm of equipped woodland play space would be provided for 0–11-year-olds and 550sqm of exercise trail and amenity lawn for 12–17-year-olds would be situated within the north east corner of the site. This

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would significantly exceed policy requirements and provide an exemplar, generous quality of amenity space for children on site. In addition to this, ample recreational space remains to contribute towards wider residential amenity and site wide play space for all ages.

- 5.68 The proposed development has sought to maximise the level of amenity space, play space, green spaces, public realm and connections through the site to contribute towards creating a successful residential environment. As such, the proposals comply with all Local Plan and London Plan policy requirements and would contribute to a unique residential environment whilst respecting the setting of the Listed Buildings.

### **Landscaping and Biodiversity**

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- 5.69 Policy DMHB14 and DME17 of the Local Plan Part Two require full consideration to be given to the retention and enhancement of existing on-site biodiversity as part of new development proposals, as well as appropriate landscaping measures, with a view to ensuring there is no loss or harm. Furthermore, policy G5 of the London Plan requires new residential developments to introduce on-site landscaping and greening measures to achieve an Urban Greening Factor score of 0.4.
- 5.70 Paragraph 131 of the NPPF emphasises the importance of trees to the environment and the requirement for trees to be protected where possible during the process of development.
- 5.71 Paragraph 170 of the NPPF (2019) states that applications should enhance the natural and local environment by recognising the wider benefits of ecosystem services and minimising impacts on biodiversity, by providing net gains where possible in and around developments. Paragraph 174 of the NPPF states the requirement to achieve Biodiversity Net Gain.
- 5.72 Policy DMHB11 of the Local Plan Part Two requires a focus on the protection and enhancement of the local environment and harmonisation with key surroundings. The landscaping proposals for the site have been developed to help create a pastoral setting, whilst respecting the initial heritage design through reintroducing the original mown paths and bringing forward additional pathways through the site. Additional planting is also proposed as part of a wider long-term landscaping strategy.
- 5.73 The design rationale for the approach to landscaping and open space within the proposed development is detailed in the accompanying Design and Access Statement and Landscaping Strategy, both prepared by SEW.
- 5.74 The supporting Preliminary Ecological Appraisal and Bat Survey, prepared by Greengage, notes, *inter alia*, the confirmed presence of BAP priority woodland habitat, moderate potential for badgers and bats and high potential for nesting birds. Mitigation measures to ensure compliance with all

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relevant policy and guidelines and achieve Biodiversity Net Gain, in line with Paragraph 170 and 174 of the NPPF, are included within the report.

### **Flood Risk and Drainage**

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- 5.75 According to the Environment Agency's Flood Risk Map, the site is located within Flood Zone 1. This indicates that the site is at a low risk of flooding. Nevertheless, as the development proposals relate to a major development on a site over one hectare, a Flood Risk Assessment has been prepared by Whitby Wood and submitted in support of this application. Policy SI12 and SI13 of the London Plan outline requirements to consider flood risk and sustainable drainage matters. Policy EM6 of the Local Plan Part One also requires the provision of SuDS systems within new unless demonstrated to be unviable.
- 5.76 The Flood Risk Assessment, prepared by Whitby Wood and submitted in support of this application, demonstrates that there is generally a low risk of flooding from most sources, although there is some scope for groundwater flooding at below ground level and recommends steps should be taken to mitigate any groundwater flooding risk to basement areas. A Drainage Assessment and Strategy Report is also submitted as part of this application and proposes a drainage strategy which confirms discharge of surface water into the sewers and proposes the use of attenuation tanks.
- 5.77 Overall, the proposals are demonstrated to comply with all relevant policies within the Development Plan and should be considered acceptable.

### **Transport and Highways**

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- 5.78 A detailed Transport Assessment and Travel Plan have been prepared by Waterman to accompany this application. These documents consider how the proposed development would impact on the surrounding transport network and the requirements in terms of deliveries and car and cycle parking.
- 5.79 Paragraph 104 of the NPPF 2019 states that development proposals should consider the impact upon local transport networks and that opportunities to promote walking, cycling and public transport use are identified.
- 5.80 At a local level, Local Plan part Two Policies DMT1 and DMT2 seek to ensure new development is located in places that encourage walking, cycling and the use of public transport. New developments should also be designed to provide safe, pleasant and convenient access for pedestrians and cyclists and consider matters related to road safety.
- 5.81 Policy T2 of the London Plan required development proposals to encourage sustainable and healthy modes of transport in line with the Mayor's Transport Strategy and Policy T5 and Policy T6 of the

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London Plan set out, variously, the minimum cycle parking standards and maximum car parking standards expected within new development.

- 5.82 The site has a PTAL Rating of 0-2, with limited access to local public transport networks. Nevertheless, the proposed development seeks to promote sustainable modes of transport. The Development proposes vehicular parking provision of 124 car parking spaces, comprising 111 standard spaces and 13 blue badge spaces and offering a ratio of one car parking space per home and sitting within the maximum parking standards set out within the London Plan. In line with London Plan standards, 20% of these spaces will be EV charging points, with 80% passive provision encompassing the rest of the spaces. As outlined within the supporting Transport Assessment, this approach has been agreed with the Council's Highways Team during pre-application discussions and should be accepted.
- 5.83 Cycle storage is provided across the site, with 203 stands for residents and 4 stands for visitors. 124 stands are located within Hayes Park South and 79 stands within Hayes Park Central. 5% of this provision is for accessible bicycles. Four short stay visitor stands are proposed externally. This provision is considered compliant with Minimum Cycle Parking Standards outlined in Table 10.2 of policy T5 of the London Plan.
- 5.84 The existing site access at Hayes End Road would be retained as primary entrance point with servicing and delivery undertaken from within the site. Arrangements for access for refuse collection vehicles and deliveries are robustly considered within the both the Design and Access Statement and the Delivery and Servicing Plan, prepared and submitted in support of this application in line with Policy T7 of the London Plan.
- 5.85 Full details of the transport strategy are set out within the accompanying Transport Assessment and Travel Plan, prepared by Waterman. The Delivery and Servicing Plan and Operational Waste Management Plan, also prepared by Waterman, outline how waste would be stored, managed, and collected when the development is operational. Overall, the proposed development is considered to comply with the relevant transport and highways policies within the Development Plan, as well as the policies within the NPPF, and should be considered acceptable.

### **Fire Safety**

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- 5.86 Policy D12 of the London Plan requires new developments to incorporate the highest standards of fire safety to ensure the wellbeing of the future residential occupiers of the buildings.
- 5.87 A Fire Statement has been prepared by Hoare Lea and submitted in support of this application. This report highlights that the proposed development would demonstrate compliance with the

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requirements set out within the London Plan and that fire safety has been given due consideration at the earliest stages of development.

### **Sustainability and Energy**

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- 5.88 Built environment sustainability is incorporated within policy and regulation at a national and local level. The Climate Change Act 2008 and the National Planning Policy Framework set out national frameworks by which to mitigate climate change, achieve reductions in carbon dioxide emissions, and deliver development that is aligned with the presumption in favour of sustainable development.
- 5.89 Specific policies within the Development Plan seek to minimise the impact of new development with respect to carbon dioxide emissions and environmental impacts, whilst also ensuring new development is resilient to the impacts of projected climate change. Policy EM1 of the Local Plan Part One states that new development should include renewable energy measures to combat climate change. In line with Local Plan Part Two Policy DME12 states that proposals should seek to minimise carbon emissions, with London Plan Policy SI1 requiring new major development to be Net Zero Carbon, minimising energy demands in line with the GLA Energy Hierarchy.
- 5.90 Policy SI7 also requires major schemes referable to the GLA to consider circular economy principles and reduce waste. These policies also require an Energy and Sustainability Strategy, a Whole Life Carbon Assessment and Circular Economy Statement to be submitted in support of major planning applications.
- 5.91 In line with the requirements of the Local Plan, and in order to demonstrate the proposed scheme's commitments to delivering sustainable development, an Energy and Sustainability Strategy has been prepared by Hoare Lea and has been submitted as part of this application. This Statement sets out the measures to be employed within the design of the proposed development in order to minimise resource and water consumption, maximise opportunities for biodiversity, and mitigate the impacts of air and noise pollution. In addition, the Sustainability Statement and Energy Statement demonstrate how the proposed design will ensure the scheme would be resilient to future climate change.
- 5.92 An Energy Strategy is also presented within the Statement, detailing the potential means by which the proposed development may minimise carbon dioxide emissions. The proposed Energy Strategy includes measures such as the employment of 9962sqm of photovoltaic (PV) panels to the roofs of the buildings, as well as air source heat pumps and new energy efficient plant at roof level. Consequently, the scheme would deliver an 85.8% reduction in carbon emissions over baseline, exceeding the requirements of 35% reduction.

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5.93 It is therefore demonstrated that the employment of the proposed Energy Strategy, where practicable, has the potential to deliver significant reductions in carbon dioxide emissions over the Part L:2021 baseline, which is in exceedance of the policy requirements set out within the Local Plan. Employment of the proposed fossil fuel-free Energy Strategy also directly responds to the aspirations of the Government's Future Buildings Strategy, as well as the London Borough of Hillingdon's declaration to achieve Carbon Neutrality by 2030.

5.94 A full Overheating Assessment has also been carried out by Hoare Lea and has been submitted as part of this application. In order to ensure adequate means of ventilation and considering the heritage constraints of the buildings and their fenestration, it is considered appropriate to implement active cooling measures to the proposed development. Further information is included within the report.

### **Noise and Air Quality**

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5.95 The NPPF states that the planning system should contribute to and enhance the natural and local environment, with paragraph 174 preventing new development from contributing to or being put at unacceptable risk from air pollution or noise.

5.96 Policy EM8 of the Local Plan Part One and Policy DME14 of Local Plan Part Two establish the policy framework, stating that new major development within Air Quality Management Areas (AQMAs) should demonstrate Air Quality Neutrality and deliver measures to improve Air Quality. An Air Quality Assessment has been undertaken by NRG Consulting and is submitted as part of this application.

5.97 The report demonstrates that the development proposals pass Building Emissions Benchmarks, but does not pass Transport Emissions Benchmarks, with mitigation measures proposed. Whereas policy DME11 of the Local Plan Part Two requires major developments within AQMAs must incorporate living roofs or walls on site, this is not considered an appropriate design intervention due to Grade II listed status. Therefore, it is not considered necessary to accord with this policy. Overall, the scheme is considered to comply with all policies relating to air quality.

5.98 A Noise Assessment and Vibration Assessment have also been undertaken by NRG Consulting and submitted as part of this application submission, to demonstrate that the scheme complies with all relevant policies within the NPPF and policy D14 of the London Plan.

### **Ground Contamination and Pollution**

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5.99 The National Planning Policy Framework states that local planning authorities should ensure that land is suitable for its new use taking account of various matters, including pollution arising from previous uses. This is endorsed by Policy DEM12 of the Local Plan Part Two.

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- 5.100 A Phase One Environmental Report has been prepared by Avison Young and is submitted in support of this application. The report concludes that there is a low environmental risk from contamination, with no visual evidence of significant ground contamination or hazardous processes observed on site. Therefore, the proposals are compliant with relevant policies.

#### **Draft Section 106 Heads of Terms**

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- 5.101 As part of the pre-application process with the Council, the draft Section 106 Heads of Terms were discussed as per Policy DMC17 of the Local Plan Part Two and the Planning Obligations SPD. The following list is considered to be the initial draft list which the Applicant would like to discuss with Council as part of the detailed assessment of the submitted documentation and the determination of the application:

- **HUDU Health Contribution** – A financial contribution to be paid to the Council for the enhancement of health infrastructure provision.
- **Air Quality Contribution** - A financial contribution to be paid to the Council to address the air quality impacts of the proposed development (if required).
- **Carbon Offset Contribution** – A financial contribution to the Council's Carbon Offset Fund (if required).
- **Public Open Space** – A financial contribution for the enhancement of existing public open space within the authority's administrative area.
- **Highways Works** – A Section 278 Agreement to secure highway works (if required).
- **Highways Improvements** – A financial contribution for local highway improvements (if required).
- **Travel Plan** – a full Travel Plan should be submitted and approved in writing by the Council.
- **Parking Management Scheme** – A financial contribution to the Council for the review of local roads, with a view to implementing a Parking Management Scheme.
- **Parking Permits** – No residents (apart from blue badge holders) would be eligible for parking permits within the Parking Management Areas and Council car parks near the site.
- **Employment Strategy and Construction Training Agreement** – preference for an in-kind scheme in line with the Council's Planning Obligations SPD.

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- **Project Management and Monitoring Fee** – Financial contribution equivalent to 5% of total contributions.



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## 6. SUSTAINABLE DEVELOPMENT AND SCHEME BENEFITS

- 6.1 The NPPF states that the purpose of planning is to help achieve sustainable development. Paragraph 7 notes that the NPPF as a whole sets out the Government's view of what constitutes sustainable development, while paragraph 8 identifies three dimensions to sustainable development, comprising economic, social and environmental roles. It is our opinion that the three roles are mutually dependent and should not be taken in isolation.
- 6.2 The following section provides an assessment of the subject site and proposed development against these criteria, demonstrating how the scheme would bring a range of economic, social and environmental benefits to the local area and the London Borough of Hillingdon.

**Table 6.1 Scheme Benefits**

<b>NPPF Sustainable Development Pillars</b>	<b>Benefits of the Proposed Development</b>
<b>Economic</b>	<p>The site is a developed site within the Green Belt, which currently contributes nothing to the local community. The proposed development would provide economic, social and environmental benefits, including the delivery of much need housing through the repurposing of two long-standing vacant office buildings which are currently not in economic activity. Therefore, securing the long-term active use of the site for new homes would optimise the use of the land in accordance with the Mayor's 'Good Growth Agenda' and representing the sustainable development of the site.</p> <p>The scheme would also ensure the delivery of 124 high quality homes in a range of sizes, helping the Council to address the current housing shortfall of 66,000 homes per annum across London and positively plan for future housing growth. This type of housing provision would address an identified need, providing opportunities for first time buyers and those looking to downsize in an area characterised primarily by semi-detached and larger houses.</p> <p>The provision of new housing in the local area would help to boost the local economy through additional residential spending from residents.</p> <p>Active Travel provides a key economic advantage as walking and cycling benefits people and the economy. These include increased spending on the</p>

NPPF Sustainable Development Pillars	Benefits of the Proposed Development
	<p>high street and town centres, benefits to employers, reduced costs for the NHS from greater physical activity and reduced congestion.</p> <p>The Applicant will comply with the relevant requirements relating to planning obligations and CIL, bringing opportunities to enhance the local infrastructure in the area for residents, workers and visitors.</p>
<b>Social</b>	<p>The development would help to further develop a cohesive, new residential community at Hayes Park, complementing the 64 new homes approved at Hayes Park North and establishing the site fully for residential use.</p> <p>The introduction of larger one and two-bed homes, particularly the 15% 2-bed 4-person homes which can accommodate small families, would help to free up larger underoccupied family houses within the borough by allowing older people to downsize in the local area.</p> <p>The development would provide a number of heritage benefits, including implementing the Optimum Viable Use for the two Listed Buildings and cleaning and enhancing the fabric.</p> <p>The Proposed Development has been designed to create a greater sense of community and improve social connectedness, through detailed consideration to the internal layouts and the creation of high-quality communal amenity space provision.</p> <p>The Proposed Development would provide 2.48 hectares of high-quality open space, including 428sqm of children's play space). Having access to this good quality open space would help to improve the physical and mental health of residents by encouraging walking, play amongst children and space to relax. It would provide a space for opportunities to provide social interaction, social mixing and social inclusion which would help facilitate the development of community ties and neighbourhood interactions.</p>

NPPF Sustainable Development Pillars	Benefits of the Proposed Development
	<p>The proposals support active travel which has clear health benefits as physical activity increases, social connections are made and mental health is boosted by activity and time outdoors in nature.</p> <p>The development is committed to ensuring the site is safe and secure by implementing Secure by Design principles. These measures would help to reduce anti-social behaviour and crime which can adversely impact on mental health of users of the area.</p>
<b>Environmental</b>	<p>The development proposes the reuse and revitalisation of an existing, unused, previously developed site which has seen little investment over its lifetime, to give it a 'second life' as it no longer provides a sustainable long-term use. This helps to safeguard greenfield land elsewhere in the Borough.</p> <p>The provision of open space and landscaping within the Site provides vital green infrastructure with multiple benefits such as mitigating climate change, flood alleviation and ecosystem services. This is enhanced through the wilding of the site, with natural pastoral landscapes instead of mown grass.</p> <p>The proposed development is car-lite, with only one car parking space per home. This encourages healthy active travel.</p> <p>The new homes provided would be of high-energy efficiency by including measures such as PV Panels, Air Source Heat Pumps and energy efficient plant. By implementing these measures into the design would ensure that the dwellings are more cost-effective and cheaper to run in the long term and reduce fuel poverty.</p> <p>The proposed development would incorporate best practice design principles with regards to air, light and noise pollution and the recommendations of the accompanying technical reports would be adopted.</p> <p>The site would deliver a development with the overarching objective to maximise the sustainability credentials, taking into consideration the site constraints, and</p>

NPPF Sustainable Development Pillars	Benefits of the Proposed Development
	<p>to ensure the proposals accord to and exceed the relevant current national, London Plan and Local Plan policies related to sustainability.</p> <p>The proposed development would also deliver a high standard of sustainability and energy consumption, being energy efficient and highly sustainable in all aspects of the design. The development would meet o policy targets in this regard.</p> <p>Improve biodiversity at the site and integration with the wider natural landscape through a high proportion of open space across totalling 2.48 hectares. This includes extensive areas of soft landscaping, hard landscaping and extensive tree planting across a mixture of green open space, play spaces, natural informal play opportunities, and private amenity space.</p> <p>The provision of a policy compliant quantum of cycle storage and other measures within the supporting Travel Plan encouraging the use of more sustainable modes of transport by residents within the local area.</p>

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## 7. PLANNING BALANCE AND CONCLUSION

- 7.1 This planning application has been prepared on behalf of Shall Do Hayes Developments Limited for the conversion of Hayes Park Central and Hayes Park South buildings to residential use, as well as internal and external works to the buildings, landscaping, car and cycle parking and other associated works at Hayes Park, Hayes End Road, Hayes, UB4 8FE.
- 7.2 The Planning Statement has outlined that the proposed development would bring two large, long-term vacant commercial buildings, with no scope for future employment use, back into active use as new homes. The Development site would provide 124 homes ranging from studio flats up to 4-bed flats, complementing the 64 residential homes approved separately within the adjacent Hayes Park North building.
- 7.3 The Proposed Development would provide significant positive economic, social and environmental, as demonstrated throughout this Planning Statement and summarised in Section 6. In particular:
- **Economic:** The proposals would secure the long-term active use of two large vacant commercial buildings for new homes. The site currently contributes little to the wider community and these proposals would provide the Optimum Viable Use of these two Listed Buildings, whilst optimising the use of the land in accordance with the Mayor's 'Good Growth Agenda'.
  - **Social:** The proposals would contribute towards the creation of a new residential community at Hayes Park, complementing the approved homes at Hayes Park North. A large quantum of high-quality amenity space, play space and landscaping is also proposed, providing space for social interaction and recreation which would be beneficial to the wellbeing of future residents.
  - **Environmental:** The Proposals have been brought forward by highly respected architects, Studio Egret West, who specialise in affording older buildings a 'Second Life'. The proposed development would sympathetically be adapted to maximise the sustainability credentials of the site and provide a high quality of energy performance. Biodiversity and landscaping improvements are also at the heart of the proposals.
- 7.4 Paragraph 11 of the NPPF applies the presumption in favour of sustainable development and requires decision makers to consider whether relevant development plan policies are up to date. Decision taking is identified in Part (c) and (d) of Paragraph 11, which states:

*c) approving development proposals that accord with an up-to-date development plan without delay; or*

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*d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date<sup>8</sup>, granting permission unless:*

*i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed<sup>7</sup>; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework as a whole.*

- 7.5 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 7.6 As the preceding planning analysis shows, a comprehensive assessment of the proposed development against the development plan policies has been undertaken, demonstrating that the scheme accords with both local and national policy, whilst providing numerous economic, social and environmental benefits that weigh in support of the scheme being granted planning permission. It is apparent that there are no technical constraints or barriers that would prevent the development from coming forward.
- 7.7 Therefore, the proposals should be approved without delay in accordance with Paragraph 11(c) of the NPPF and Section 38(6) of the Planning and Compulsory Purchase Act 2004.

## A1. FULL PLANNING HISTORY

Location	Reference	Description	Date
Hayes Park Central and South Buildings	12853/TRE/2020/366	1no. Raywood ash - fell 2no. Raywood Ash - reduce crown to 4m and remove broken limbs/stub ends 1no. poplar - remove branch 19no. Leyland cypress - fell 1no. silver maple - Re pollard 1no. London plane - Re pollard And in the validation letter advise them deadwood removal does not require an application.	Pending validated 12/15/2020 –
Hayes Park Central and South Buildings	12853/APP/2020/2980	Internal office refurbishment of Hayes Park Central and South including removal of the non-original partitions, re-instatement of the South Building's reflecting pool and refurbished entrances. External elevation and roof refurbishment of both buildings including cleaning and repair works, replacement of non-original glazed double doors and other works to the South building's glazed curtain wall system (Application for Listed Building Consent)	Granted – 09/02/2021
Hayes Park North Building	12853/APP/2020/2981	Erection and installation of external cycle storage, trim trail and outdoor seating	Granted – 04/12/2020
Hayes Park Lodge	74440/TRE/2019/284	Fell T193 Sycamore due to trunk decay Fell T198 Cherry due to significant dieback and defective above main fork from 4m Fell T352 Ash due to poor, leaning, no long term retention potential (All within G8 on TPO 24).	Granted – 28/02/2020
Hayes Park North Building	12853/TRE/2018/214	G191 Lime - Crown lift to 2.5m T280 Ash - Remove split branch T351 Raywood Ash - Remove damaged limb back to parent stem at fork H1 Hornbeam - Thin stems by 50% in G8 on TPO 24	Partially Granted – 04/02/2019
Hayes Park North Building	12853/TRE/2017/124	To fell one (defective) Horse Chestnut (T196 on application), one (defective) Ash (T281) and three (defective) Poplars (T283, 284 & 285) in group G8; and to carry out tree surgery, including a crown reduction by 50% to one London Plane (T195) in Woodland W2 and a crown reduction by 30% to the remaining group of Poplars (G4) in group G8 on TPO 24.	Granted – 16/08/2017
Hayes Park Central Building	12853/TRE/2017/59	To pollard one Ash (rear of 120) to 7m and to carry out tree surgery, including the cutting back of overhanging lateral branches by 2-3m to three Ashes (rear of 88, 76 and 64) within Woodland 3 on TPO 24	Partially Granted – 11/05/2017

Location	Reference	Description	Date
Hayes Park	12853/ADV/ 2017/41	Installation of 3 flagpoles	Granted – 03/05/2017
Hayes Park Central Building	61325/TRE/ 2017/30	To carry out various pruning and felling works to several trees on TPO 24	Granted – 10/03/2013
Hayes Park	12853/APP/ 2012/612	Approval of details reserved by condition No. 4 (Tree Protection) of planning permission 12853/APP/2011/1946 dated 02/03/2012 (Installation of new cycle shelter)	Granted – 02/05/2012
Hayes Park South Building	12853/APP/ 2011/1946	Installation of new cycle shelter.	Granted – 02/03/2012
Hayes Park South Building	12853/APP/ 2007/3364	Details of condition 3 (brick and pointing and condition 4 (site survey) in compliance with Listed Building Consent ref: 12853/app/2006/3060, dated 29-01-2007: (rebuilding of listed boundary wall to the rear and side of united biscuits building)	Granted – 03/02/2012
Hayes Park South Building	12853/APP/ 2010/2186	Internal alterations to include overpanel to doors, new access door, replacement fire door and replacement skirting to the reception area (Application for Listed Building Consent.)	Granted – 15/11/2010
Hayes Park South Building	12853/APP/ 2010/277	Internal alterations to existing staircases and alterations to front entrance (Listed Building Consent)	Granted – 20/04/2010
Hayes Park Central Building	12853/APP/ 2009/2467	Details in compliance with conditions 2 (photographic survey), 3 (samples of mortar mixes, pointing style and bricks) and 5 (demolition and construction management plan) of Listed Building Consent ref.12853/APP/ 2009/510 dated 26/10/2009; Alterations and repair to boundary wall, to include demolition.	Granted – 24/02/2010
Hayes Park Central Building	12853/APP/ 2009/2466	Details in compliance with conditions 2 (Photographic survey), 3 (Samples of mortar mixes, pointing style and bricks) and 5 (Demolition and construction management plan) of planning permission ref.12853/APP/2009/ 509 dated 26/10/2009: Alterations and repair to boundary wall, to include demolition.	Granted – 26/01/2010
Hayes Park North Building	12853/APP/ 2009/510	Alterations and repair to boundary wall, to include demolition (Application for Listed Building Consent).	Granted – 26/10/2009



Location	Reference	Description	Date
Hayes Park North Building	12853/APP/2009/509	Alterations and repair to boundary wall, to include demolition.	Granted – 26/10/2009
Hayes Park North Building	12853/APP/2006/3060	Rebuilding of listed boundary wall (to the rear and side of united biscuits building) (application for Listed Building Consent)	Granted – 29/01/2007
Hayes Park North Building	12853/APP/2004/76	Erection of 2.25m high freestanding garden walls (application for Listed Building Consent)	Withdrawn – 06/06/2005
Hayes Park	12853/APP/2003/2530	Replacement and erection of 3 close circuit television cameras	Granted – 06/07/2004
Hayes Park	12853/APP/2004/543	Discharge of a planning obligation restricting representations being made in the development plan process to exclude land from the green belt (application under section 106a of the town and country planning (modifications and discharge of planning obligations) regulations 1992	Granted – 22/06/2004
Hayes Park	12853/APP/2001/2147	Details of fencing to protect trees to be retained and the position of stockproof fencing in compliance with conditions 5 and 6 of planning permission ref.12853/app/2000/675 dated 06/0701; creation of a new vehicular access to Hayes park from proposed roundabout on Hayes end road and associated landscaping, signage and lighting	Granted – 02/12/2003
Hayes Park South Building	12853/APP/2002/320	Installation of low rise turnstile type security barriers to existing reception area	Granted – 08/04/2002
Hayes Park South Building	12853/APP/2002/367	Installation of low rise turnstile type security barriers to existing reception area (application for Listed Building Consent)	Granted – 08/04/2002
Hayes Park North Building	12853/APP/2001/1682	Installation of extract duct and satellite dish	Granted – 26/10/2001
Hayes Park North Building	12853/APP/2001/1683	Installation of external doors to east elevation	Granted – 04/10/2001
Hayes Park South	12853/APP/2000/66	Details of landscaping scheme in compliance with condition 10 of planning permission ref.12853w/96/1667 dated 10/08/96; refurbishment of existing administration building and research building and erection of new office building	Granted – 11/07/2001

Location	Reference	Description	Date
Hayes Park	12853/APP/ 2000/675	Creation of new vehicular access to Hayes park from proposed roundabout on Hayes end road, closure of existing access from Hayes end road and associated landscaping, signage and lighting	Granted – 06/07/2001
Hayes Park Central Building	12853/APP/ 2001/382	Installation of roof mounted extract fans and external vent	Granted – 01/05/2001
Hayes Park Central Building	12853/APP/ 2001/384	Internal fitting out, roof mounted vents and below ground fuel tank (application for Listed Building Consent)	Granted – 01/05/2001
Hayes Park Central Building	12853/APP/ 2004/1857	Partial demolition of listed wall (application for Listed Building Consent)	Granted – 17/02/2001
Hayes Park South Building	12853/APP/ 2000/1904	Internal partition works and installation of 10 condenser homes and a kitchen extract pipe (application for Listed Building Consent)	Granted – 20/09/2000
Hayes Park	12853/APP/ 1999/2578	Details of landscaping scheme in compliance with condition 8 of planning permission ref.12853w/96/1667 dated 10/09/98; refurbishment of administration and research buildings for office use and erection of new office building	Granted – 25/01/2000
Hayes Park South Building	12853/AD/ 99/1551	Details of tree protection in compliance with condition 7 of planning permission ref. 12853W/96/1667 dated 10/08/98; Refurbishment of existing administration and research buildings for office use, the erection of new office building and decked car park	Granted – 23/12/1999
Hayes Park South Building	12853/W/ 96/1667	Refurbishment of existing administration and research buildings for office use, the erection of a new office building and decked car park (involving the demolition of Field House and garden walls), realignment of internal road and provision of car parking and landscaping to individual buildings	Granted – 10/08/1998
Hayes Park South Building	12853/X/ 96/1670	External and internal alterations to administration and research buildings and demolition of a former market garden wall (Application for Listed Building Consent)	Granted – 10/08/1998
Hayes Park South Building	12853/Z/ 97/0653	Alterations to gardener's compound buildings (Application for Listed Building Consent)	Granted – 01/04/1998
Hayes Park South Building	12853/Y/ 97/0651	Demolition and reinstatement of part of a pre-1948 garden wall (Application for Listed Building Consent)	Granted – 18/11/1997

Location	Reference	Description	Date
Hayes Park South Building	12853/AA/97/0654	Installation of a temporary car park on part of existing parkland including a temporary footbridge /pathway and associated fencing	Granted – 14/11/1997
Hayes Park South Building	12853/S/92/0377	Refurbishment and expansion of existing offices (involving demolition of redundant offices in car park areas) and erection of a single deck car park	Allowed appeal at – 17/03/1993
Hayes Park South Building	12853/T/92/1931	Installation of 60cm satellite dish on existing office building	Granted – 15/01/1993
Hayes Park South Building	44241/A/90/1314	Refurbishment/extension of existing headquarters building, construction of a new access road (through Mellow Lane School and Heath Gardens grounds) to Uxbridge Road, erection of a new replacement school north of existing Mellow Lane School buildings (within school grounds), provision of area over which public will have recreational access (outline application)	Withdrawn – 22/10/1992
Hayes Park South Building	12853/P/91/0150	Refurbishment and expansion to existing offices (involving demolition of redundant offices in car park areas) and erection of a single deck car park	Withdrawn – 21/04/1992
Hayes Park South Building	44241/90/0121	Refurbishment/extension of existing headquarters building, construction of a new access road (through Mellow Lane School and Heath Gardens grounds) to Uxbridge Road, erection of a new replacement school north of Mellow Lane East, provision of area over which public will have recreational access (outline application)	Withdrawn – 27/06/1990
Hayes Park South Building	12853/N/88/1529	Change of use of food research building to any use within Class B1 without complying with Appeal Decision	Refused – 08/11/1988
Hayes Park South Building	12853/L/87/2219	Erection of a temporary building for use as additional offices until the end of 1991	Granted – 24/02/1988
Hayes Park South Building	12853/K/85/1501	Office development	No Further Action – 30/09/1986
Hayes Park South Building	12853/G/80/0097	Householder development (small extension, garage etc.)	Granted – 03/05/1980