



# Response to TfL Comments

Date: **February 2026**

Title: **Hayes Park West – Response to TfL Comments**

## a. Introduction

1. This note has been prepared by Iceni Projects on behalf of Shall Do Hayes Developments Ltd (The Applicant), as a response to comments received on the Hayes Park West Application. Comments were dated 19<sup>th</sup> January 2026.
2. The table below highlights the comments made by TfL in the left-hand column with the Iceni response on behalf of the Applicant in the right-hand column.
3. Should there be a need for further discussions, Iceni and the Applicant team would welcome the chance to discuss this further.

TfL Comment	Iceni Response
<b>Access</b>	
<p>Both pedestrians and vehicles will have access to the site via two gated points: from the junction with Park Lane to the east and Mead House Lane to the south. Whilst the principle of the access is in line with the extant permissions of other sites within the wider Hayes Park development, it is questioned whether the control of pedestrian access through the site via the provision of a gate supports the creation of a socially inclusive London. Policy D5 (Inclusive Design) and Policy D8 requires developments to be well-connected and accessible to all users, avoiding segregation or exclusion by creating safe and attractive spaces that encourage active travel. Gated layouts conflict with these principles reducing connectivity. Security should therefore be achieved through urban design measures to improve the public realm rather than physical barriers.</p> <p>Pedestrian routes into Hayes Park West will be via Hayes Site Road at the upper deck and through Hayes Park North (HPN) car park at the lower level. Designated pedestrian footpaths should be provided for all routes. All resident parking is at lower ground level, which is also the primary access point for most homes, meaning that pedestrians would have to either walk through the covered car park to access their homes or through the adjoining car park at HPN. The only level access to the courtyard is through HPN car park, compromising the direct routes for those with limited mobility. This raises concerns around the</p>	<p>Whilst there are gates at the access to Hayes Park, these will be monitored by a daytime concierge service and will not restrict people moving in and out of the development. It should also be noted that not all of the site is controlled by the applicant and therefore it does not have full control over how the gates should be used.</p> <p>Policy compliant car parking is provided at the lower ground level, outside some flats but there are clear walking routes from the rest of the Hayes Park Estate to each unit.</p> <p>The plan produced by SEW on pages 157 and 158 of their addendum Design and Access Statement (appended to this response) shows the location of these routes across not just Hayes Park West but the whole Hayes Park Site and how people can access units without the need to walk through the car parking spaces.</p> <p>Car parking provision is compliant with both LB Hillingdon and TfL policies and therefore a reduction is not required. The number of parking spaces is driven by the low PTAL due to this being in an outer London location.</p>

provision of safe, convenient, and accessible routes for all users.

The current arrangement highlights a car-dominated layout, which conflicts with the Healthy Streets approach and Vision Zero principles that aim to prioritise walking and cycling and reduce road danger. To address these issues, car parking provision at the site should be reduced to prioritise safe, dedicated pedestrian and cycle routes. This should be supported by clear wayfinding, and inclusive access points that do not rely on passing through adjacent car parks.

### Healthy Streets

The application is supported by a Transport Assessment (TA); however, it does not currently conform to the Healthy Streets Approach, as no Active Travel Zone (ATZ) assessment has been undertaken. TfL requests that the TA includes a comprehensive ATZ assessment covering both daytime and night-time conditions in line with London Plan Policy T2 and the Mayor's Ending Violence Against Women and Girls (EVAWG) Strategy. This should consider key pedestrian and cycle routes from the site to public transport connections and other trip attractors such as shops, high streets, cultural centres, and places of worship. The assessment should identify the 'worst points' along each route and propose improvements aligned with the Healthy Streets Indicators. Guidance on completing ATZ assessments can be found here: <https://content.tfl.gov.uk/atz-assessment-instructions.pdf>.

Given the proposed residential use, arrivals and departures will occur throughout the day and night. The northern boundary of the site lacks active frontages and passive surveillance and is overlooked by dense vegetation; this raises particular concerns surrounding the perceived safety of the public realm likely deterring pedestrian and cyclist journeys at night. Measures should be identified to improve the perceived safety of the site's public realm during hours of darkness.

The Council is encouraged to secure pedestrian, cycle, and public realm improvements based on the ATZ findings to support active travel at all times of day, in accordance with London Plan Policy T2.

A Transport Statement was provided with the application as it was not believed to meet the thresholds for a transport assessment. However, the applicant has committed to producing an active travel zone audit which will be provided shortly.

### Cycle Parking

The applicant proposes 97 long-stay cycle parking spaces and 10 short-stay spaces, which is in line with London Plan Policy T5 requirements. The

An updated plan has been produced by SEW (page 159 of the attached addendum), the architects, showing changes to the cycle

proposed ratio of 20% standard Sheffield stands and 5% enlarged bays also aligns with Policy T5 Table 10.2 requirements and the London Cycling Design Standards (LCDS) guidance, which is welcomed.

However, high-quality cycle parking is essential to support strategic modal shift. Based on the plans provided, TfL has concerns about the quality of provision. These can be summarised as:

- External door widths are currently shown as 1m; these should be a minimum of 2m, particularly as enlarged cycle spaces are located within these areas.
- Ideally, cycle stores should have a clear width of 3,500mm to accommodate double-stacking racks effectively.
- Where Sheffield stands are provided, the minimum centre-to-centre spacing must be 800mm to ensure usability.
- Short-stay spaces should be clearly identified on drawings and located within 15m of main entrances to ensure genuine usability of the spaces.

The above should be addressed prior to the application being determined.

stores in order to be LCDS compliant. This demonstrates doors are 2m wide, that there is a clear width within the cycle store of 2.5m, which is the minimum allowed, 800mm between Sheffield Stands and highlights the location of short stay spaces as requested.

**Car Parking**

The applicant proposes 52 car parking spaces, including five (9%) disabled persons' bays and seven bays with active electric vehicle (EV) charging provision (13%). While the quantum of disabled persons parking aligns with London Plan Policy T6.1 (Residential Parking), the percentage of active EV charging infrastructure should be uplifted to 20% of all parking provision in line with policy T6.1 requirements. A the other 80% of spaces should be equipped with passive provision for future EV rollout. TfL has several concerns regarding design, management, and compliance with other policy requirements set out within the London Plan.

There is a risk that parking demand could overspill into adjoining sites, internal roads, and areas intended for turning circles. The proximity of additional parking within Hayes Park North increases the likelihood that residents will use these spaces, undermining strategies to increase active travel to the site. To mitigate this, TfL recommends that a Car Parking Management Plan is secured by condition to outline allocation,

As the development includes a significant amount of podium parking, it is not able to comply with the 20% active charging infrastructure due to building regulations constraints. All spaces outside the podium are identified for EV charging but to provide for more within the podium would require a sprinkler tank the same size as the podium itself. This is neither practical nor financially viable for such a scheme and therefore it is proposed to retain the previous EV charging strategy. It is also not proposed to move more spaces from inside the podium to outside as this would only serve to impact the high quality landscaping and public realm surrounding the Site.

A car park management plan will be conditioned as noted. Within this it will include measures to prevent Hayes Park West residents from parking within Hayes Park North spaces. Controls will also be in place across the wider estate, as well as a parking enforcement company being in

<p>enforcement measures, and monitoring to prevent informal use of adjacent spaces.</p>	<p>place, to reduce the risk of cars parking outside of spaces.</p>
<p><b>Transport Network Impacts</b></p>	
<p>The vehicle trip generation assessment provided estimates 16 two-way vehicle trips in the AM peak and 13 in the PM peak, but person-trip assessment and consideration of impacts on bus and rail capacity are limited. In particular, the proposal does not account for secondary trips, where residents may use buses to access stations such as Uxbridge, Hillingdon or Hayes &amp; Harlington before continuing their journey by rail. These linked trips could increase pressure on local bus services and interchange points and should be reflected in the analysis.</p> <p>Methodology used to determine multi-modal trips to the site should be robust and align with London Plan Policy T4 and TfL guidance. The current approach relies on 2011 Census data, which does not reflect significant changes in active travel patterns since then. Instead, mode share assumptions should be based on TfL's strategic assumptions or LTDS data to provide a more accurate picture of travel behaviour.</p> <p>A revised approach to trip generation that uses up-to-date data sources, includes robust multi-modal person-trip generation assessment is requested.</p>	<p>The methodology to calculate the transport impact has been agreed by LB Hillingdon. Whilst TfL have been consulted as the site is GLA referable due to being in the greenbelt, they would not normally be consulted for a site of this size. As such a methodology has been used that has been implemented elsewhere across the London Borough of Hillingdon for sites of this scale and therefore this is considered to be appropriate here as well.</p>
<p><b>Travel Plan</b></p>	
<p>A framework Travel Plan (TP) has been provided within the TA, however, given the site's PTAL of 0 and the provision of 52 car parking spaces, the Travel Plan must be more ambitious to mitigate car dependency and align with London Plan Policy T4 and TfL's Travel Plan Guidance. The baseline mode share of 77.2% car trips and the proposed target of a 10% reduction in car trips over five years is considered too modest.</p> <p>The inclusion of soft measures such as travel packs and Bicycle User Groups are welcomed, however as noted above it is considered that improvements to the quality of the active travel environment is required to support facilitating a strategic modal shift at this site.</p> <p>The Travel Plan lacks clear commitments for remedial actions if targets are not met. The TP should be updated to prioritise creating safe, well-lit, and legible walking and cycling routes, supported by ambitious targets and monitoring. A full TP should be secured via condition.</p>	<p>It is noted and agreed that a full travel plan should be secured by condition. Whilst the mode share targets could be more ambitious, they also have to remain realistic for the area and for a site of this PTAL. These targets have also been raised by LBH and it is proposed and agreed with LBH that these targets will be reviewed in the final travel plan.</p>

<b>Delivery and Servicing</b>	
<p>TfL welcomes that deliveries and servicing will occur on-site via Hayes Site Road, in line with London Plan Policy T7. To ensure the safety of vulnerable road users, vehicles should be able to manoeuvre in and out of the site in forward gear, consistent with Policy T7 and the Mayor's Vision Zero approach. A swept path analysis for the largest vehicle expected to service the site should be provided to confirm suitability. While turning heads are proposed in the southeast and southwest of the development, there are concerns about their practical usability given the likelihood of informal parking or obstruction in these areas. The applicant should demonstrate how these spaces will be kept clear to ensure safe manoeuvring.</p> <p>The applicant should identify measures to reduce the impact of freight on the network and support the Mayor's Transport Strategy. Trip generation associated with servicing is estimated at 18 trips per weekday. It is recommended that the applicant explores sustainable and active freight options such as delivery consolidation and the use of zero-emission vehicles and cargo bikes for last-mile deliveries. Provision for cycle couriers should be safe and convenient, ensuring visitor cycle parking is suitable for these cycle types.</p> <p>A Delivery and Servicing Plan should be secured by condition. This should set out how delivery activity will be managed, with any protocols to maintain pedestrian and cyclist safety during servicing operations.</p>	<p>The turning heads are to be kept free of parked cars via parking controls which will be detailed in the final CPMP. Vehicles are unable to stay in forward gear due to the height restrictions caused by the podium meaning vehicles are not able to loop around the Site and remain in forwards gear.</p> <p>It is noted that the DSP should be secured by condition and this report will include details of how residents will be encouraged to utilise companies that provide greener alternatives for deliveries. Although it should be noted that this cannot be enforced upon residents. The cycle plan produced by SEW (Page 159 of the addendum) and appended to this note also shows the short stay spaces that can be utilised by cycle couriers.</p>
<b>Construction</b>	
<p>The applicant has provided an Outline Construction Logistics Plan (CLP); a detailed CLP should be secured by condition to demonstrate how construction traffic will be managed to ensure the safety and operation of the surrounding network, incorporating best practice measures and sustainable construction logistics.</p> <p>It is requested that the applicant commits to contractors and drivers being FORS and CLOCS compliant, in line with TfL's CLP guidance and London Plan Policy T7. Deliveries should be scheduled outside peak hours and managed to avoid waiting on local roads, which could disrupt the Strategic Road Network. If deliveries are turned away, the applicant should confirm the anticipated waiting location.</p> <p>It is noted that other planning applications have been approved in the area, and it is imperative that construction traffic is coordinated between these</p>	<p>It is noted and agreed that a final version of the CLP should be secured by condition. This will include an agreement to use contractors who are FORS and CLOCS compliant as well as timings for deliveries. All further details will be included in the final CMP noting the measures and mitigation included in the TfL response.</p>

sites to minimise cumulative impacts on the surrounding road network. With ongoing construction across the Hayes Park Estate, it must also be considered that units at Hayes Park North, Central, or South may become operational during the construction period.

Vehicle access is proposed via a pit lane parallel with HPN car park, which is supported; however, further details are needed on the exact location of the pit lane and the proposed access route through HPN car park. If this car park is operational, pedestrian safety and desire lines should be maintained. No swept path analysis for construction vehicles has been provided; these should be submitted to ensure vehicles can enter and exit the site in forward gear, in line with Policy T7 and the Mayor's Vision Zero objectives to reduce road danger.

The commitment for construction workers to use public transport is supported in principle; however, further measures are needed to ensure workers will not park along nearby roads given the absence of a Controlled Parking Zone. The site should provide welfare facilities for staff, including high-quality cycle parking to encourage active travel in line with Policy T5 of the London Plan and LCDS guidance. A staff Travel Plan should also be provided and secured by condition.

## **APPENDIX A1 SEW – DESIGN AND ACCESS ADDENDUM**

**Addendum:  
response to  
Hillingdon and  
GLA comments**



## Urban Design Comments, Addendum UD6B: Proposed parking strategy for Courtyard

**A external platform lift will provided to allow level access from the front podium to the internal courtyard garden.**

The site has six number of approved (5 no areas) and proposed (1 no area) blue badge parking areas for cars that may be used by wheelchair and ambulant disabled users. The overall site site plan shows that these spaces are well distributed throughout the site.






In addition we have indicated possible routes for vistors from HPN, HPC and HPS can vist the Hayes Park West.

We propose an external lift for wheelchair and ambulant disabled users that connects the Ground level podium to the lower ground floor and rear courtyard.

Proposed external lift  
Accessible drop off area



Proposed overall Hayes Park estate plan, with Hayes Park West, North (HPN), Central (HPC) and South (HPS) shown.

-  Wheelchair Ambulant disabled route to HPN
-  Wheelchair Ambulant disabled route to HPC
-  Wheelchair Ambulant disabled route to HPS
-  Parking spaces (approved and proposed)
-  Proposed External lift






Proposed overall external lift connecting the ground floor podium to the lower ground parking and courtyard.

## Urban Design Comments, Addendum UD6B: Proposed parking strategy for Courtyard

**A external platform lift will provided to allow level access from the front podium to the internal courtyard garden.**

Wheelchair and ambulant disabled users can call the lift at the ground floor podium and travel to the lower ground floor and access the rear courtyard via the car park. Similarly the lift can be taken from the lower ground floor (where the car park is located) up to the podium level.

The lift shall be Approved Document Part M (ADM) compliant a minimum plan area of 1100mm by 1400mm. All the controls shall be compliant with ADM.

-  Wheelchair Ambulant disabled route
-  Fob access
-  Proposed External lift



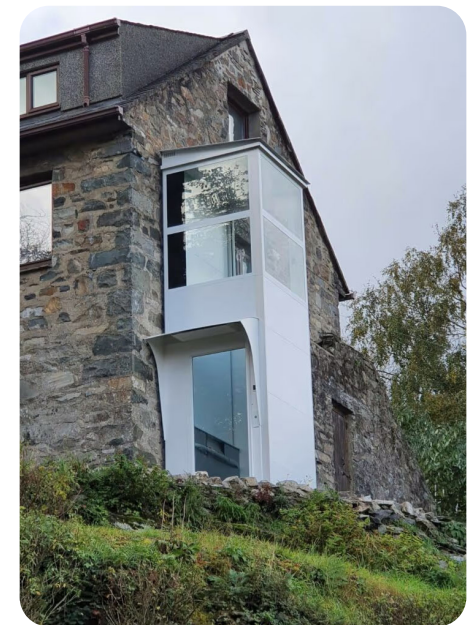
Drop off at podium and move to lift

Proposed Ground floor plan showing wheelchair / ambulant disabled user access to the external platform lift

Pick up at podium or continue journey on the pavement to Hayes Park, South, Central or North



Proposed platform lift, simple discreet design with rain protection to the access level, proposed colour is green



Proposed platform lift, design allows for direct entry and exit at 90 degrees, similar to the situation at Hayes Park West

# Urban Design Comments, Addendum UD6B: Proposed parking strategy for Courtyard Access



Proposed Blue  
Badge parking  
space

Proposed route  
to lower ground  
courtyard

- ➔ Wheelchair Ambulant disabled route
- Fob access
- Proposed external lift

Proposed Lower ground floor plan showing wheelchair / ambulant disabled user access to the external platform lift and the courtyard



Proposed glass envelope to external lift to provide additional safety and security. Modular system allowing for site adjustment as necessary.



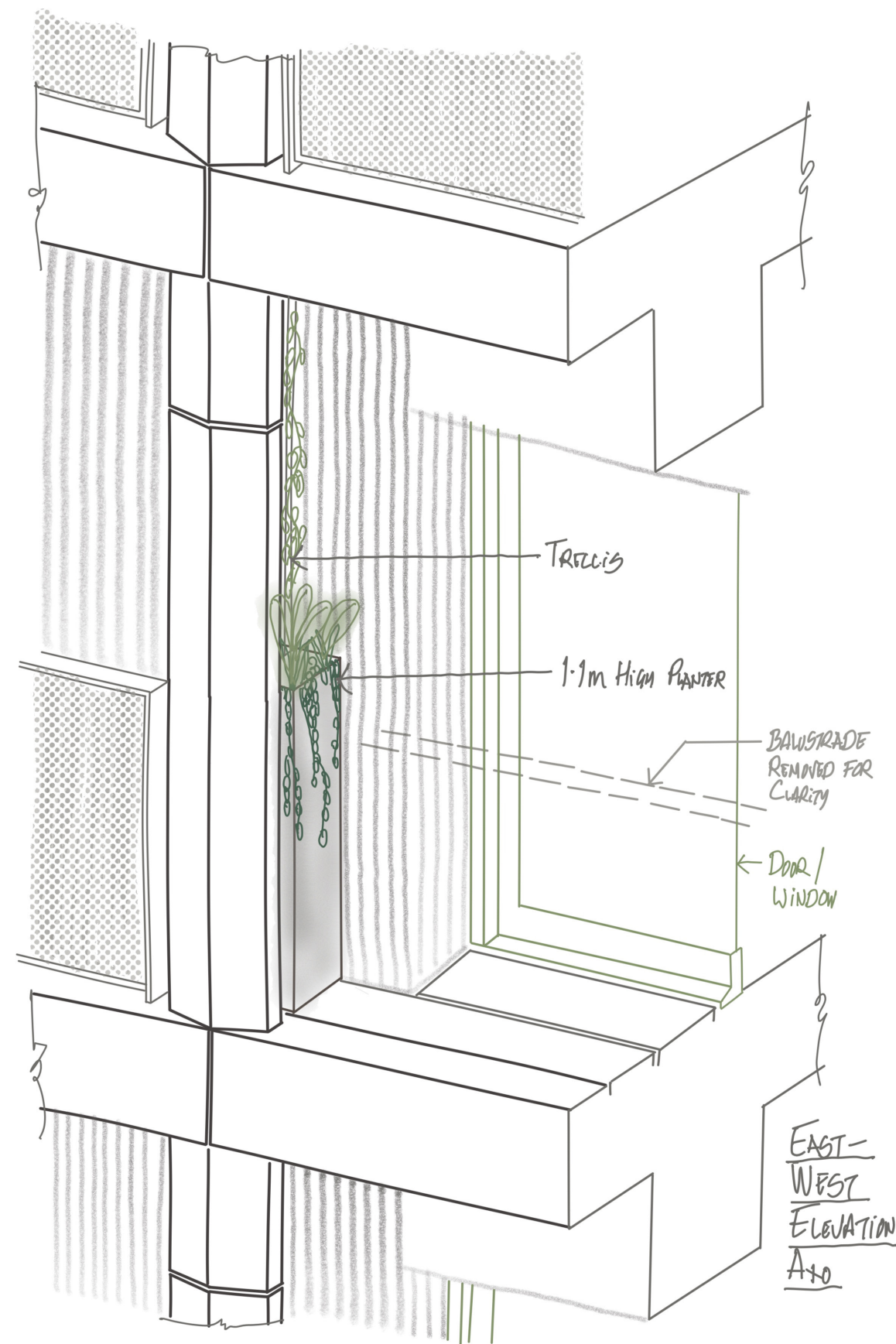
Proposed platform lift, with glazed doors to the north and east side. Note the simple glass envelope to provide additional safety and security. We would propose [me@capitalandcentric.com](mailto:me@capitalandcentric.com) green panels to match car park cladding.

## Urban Design Comments, Addendum, UD6H: Balcony Privacy Screen

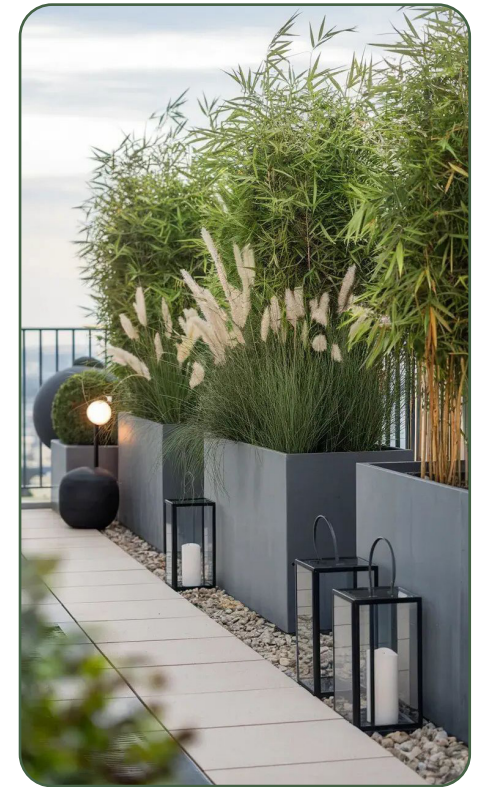
**Privacy is important to foster a community. Our proposal seeks to ensure privacy and interaction, using nature and planting.**

To provide a robust privacy screening we propose a solid planter that can be shared with a neighbour. To the East and West elevations, the planter is 1.1m high to tie in with the balustrade datum. In addition a shared trellis is shown at the back of the planter. The trellis is made from metal wires that span from the planter to the soffit. It allows the residents to grow their own climbing plants, that be nurtured individually or between neighbours. The density of the trellis can be increased in dialogue with your neighbour.

A solid privacy screen would detract from the overall design that is focused on community and openness.



Axo view to the East / West facade showing the proposed planter



Example of planter circa 1.1m high



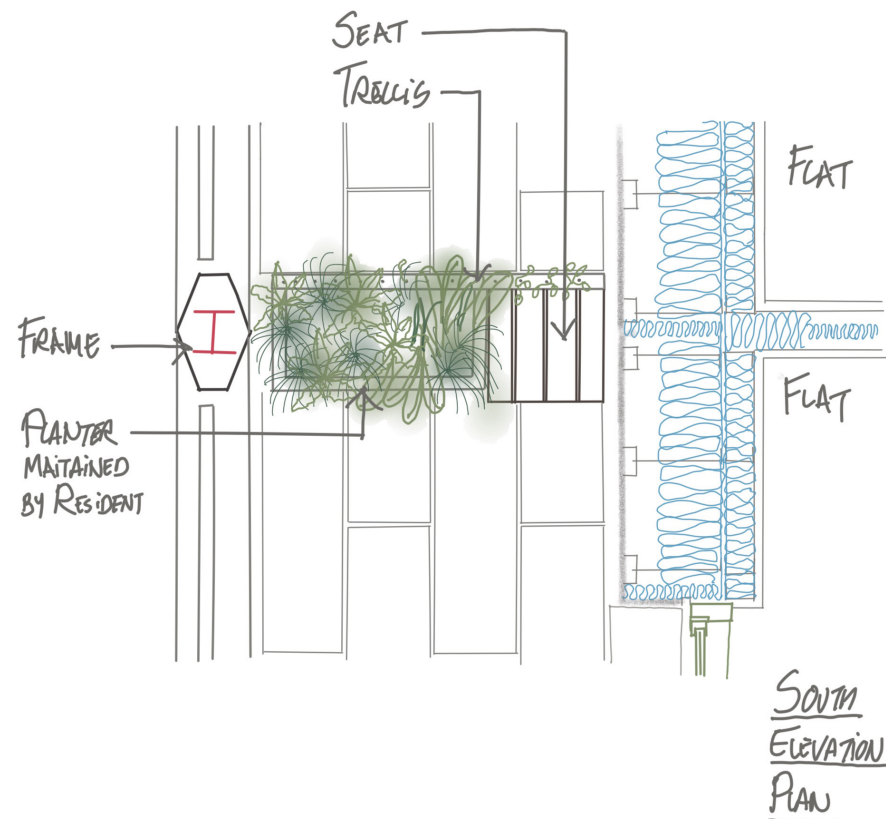
Example of planter circa 1.1m high

## Urban Design Comments, Addendum, UD6G: Balcony Privacy Screen

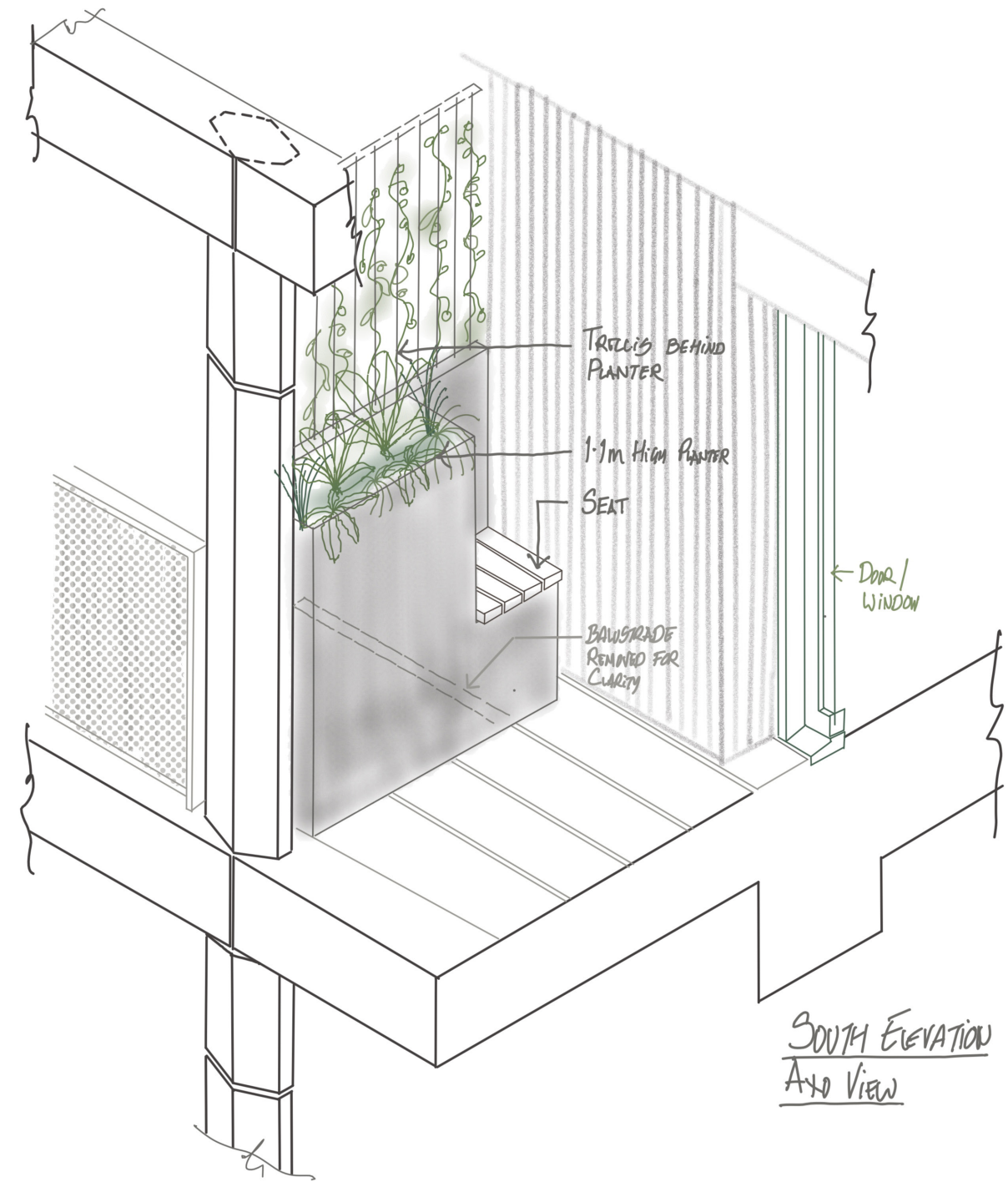
Privacy is important to foster a community. Our proposal seeks to ensure privacy and interaction, using nature and planting.

To the south elevation, the 1.1m high planter is lengthened and includes a bench. The wider planter gives more options to explore new planting. A bench nearby the elevation provides an opportunity to rest and enjoy the wider terrace. The planter is maintained by the resident on the lower side, next to their seat. Using this arrangement there will be at least one planter for each flat.

A metal trellis with vertical wires is located at the back of the planter and seat to provide a robust but transparent screening. A shared trellis is shown that can be grown individually or between neighbours. The density of the trellis can be increased in dialogue with your neighbour.



Example of zinc planter, planting and timber seat



SOUTH ELEVATION AND VIEW

Plan and Axo view to the South Elevation showing the proposed planter






## Urban Design Comments, Addendum, UD6K: Proposed vehicular main access strategy with managed delivery

The proposed access strategy looks to reuse the existing access points and estate road.

The buildings and parking on Site will be accessed via the existing estate loop road. This is either 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.

Each vehicular entry point will be gated, with residents only access controlled by fobs.

There is an opportunity to reuse the existing main gate entrance building as a concierge. This will form part of a wider management strategy for the whole estate. Deliveries to the site will be dropped off at the Main Gate Buildings on Park Lane Road, and Hayes End Road. These Buildings will be occupied during standard working hours.

-  Vehicular route
-  Vehicular route (cars under-croft only)
-  Security Buildings
-  Security gates
-  Redline

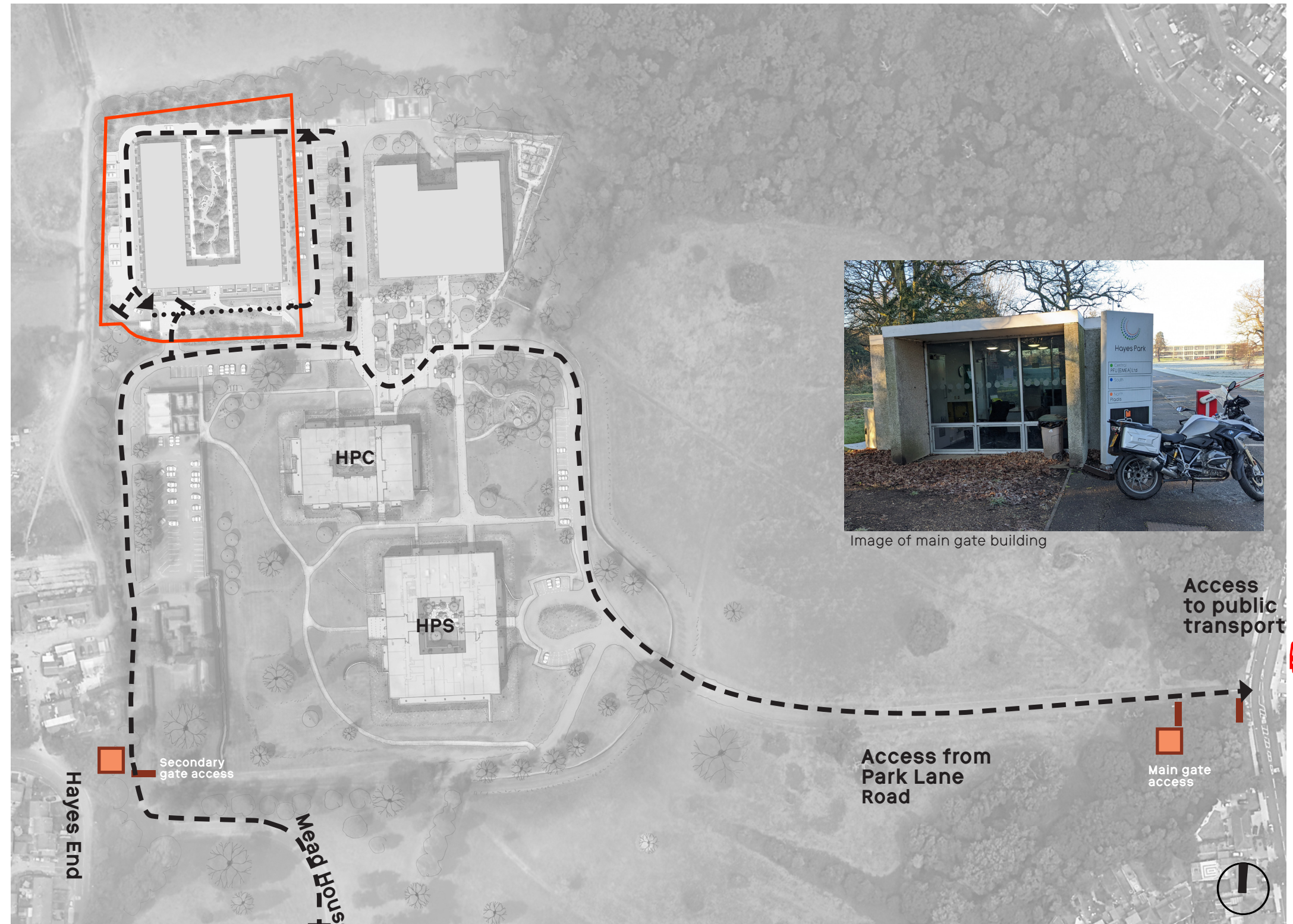


Diagram showing the proposed vehicular access around the Site

## Urban Design Comments, Addendum, UD6L: Ancillary Amenity

**This space is for the residents to share. The space can be used flexibly, to cater for all residents and to sustain Hayes Park West community**

The space is integral to our design and has been shown in our original renderings with a children's party spilling over to the communal courtyard. In addition, we foresee that the space could be used for: community / residents meetings, ping pong, yoga, indoor play, cinema, and gaming. We estimate the following potential occupancy within the ancillary space:

- A standing event 0.5m<sup>2</sup> at 40sqm = 80 people
- A party (sitting and standing) 1sqm at 40sqm = 40 people

The space may also be rented out for private hire to benefit the residents.

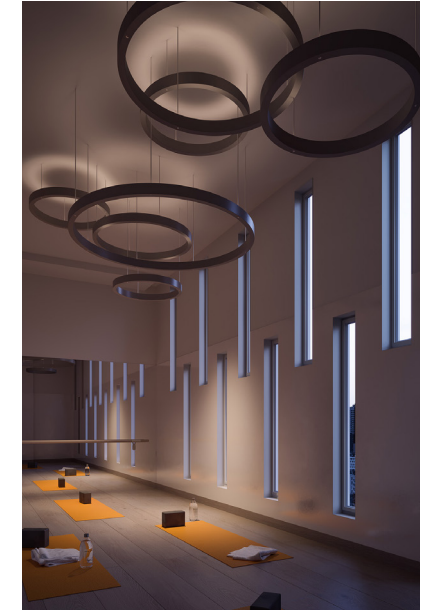
An Approved Document Part M WC can be provided as well as a store and a small kitchenette to support these activities.



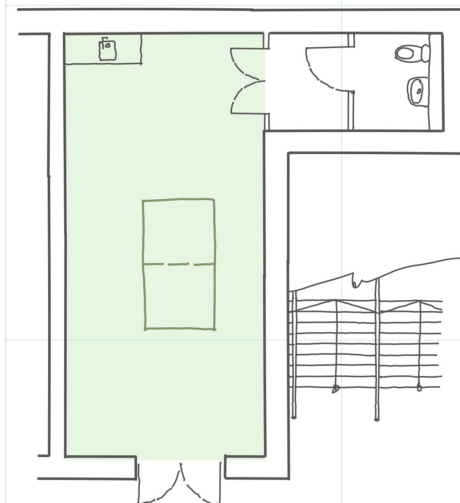
Illustrative external view of the Ancillary Amenity from within the courtyard with a children's party spilling over



Children's party use

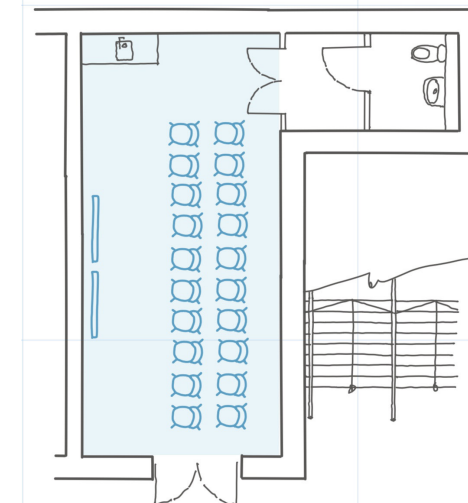


Yoga / wellbeing use



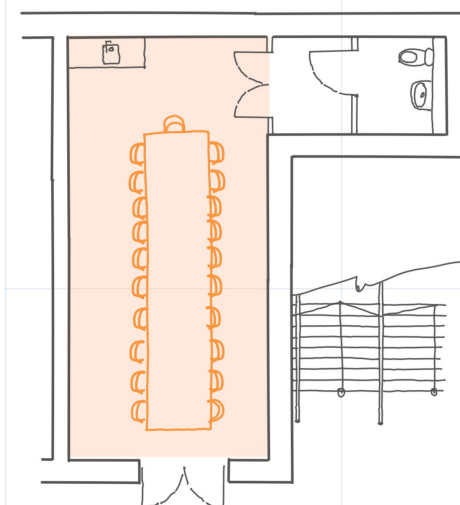
**Ancillary use 1:**

Ping pong, possible to fit another table, note the store and W/C and kitchenette shown



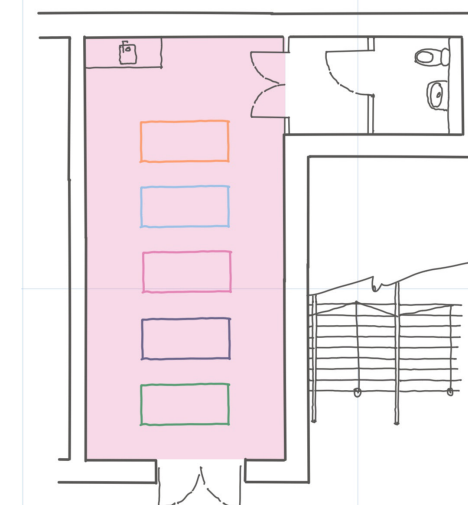
**Ancillary use 2:**

Residents meeting, a sports game on TV, note the store and W/C and kitchenette shown



**Ancillary use 3:**

A children's party, it can spill out to the courtyard, in car free landscape, note the store and W/C and kitchenette shown



**Ancillary use 4:**




Yoga or well being shared activity for residents, note the store and W/C and kitchenette shown

## GLA Comments item 42, Addendum: Main Pedestrian routes through the site

The site is not dominated by cars, there are many pedestrian routes beside the road or within the Pastoral Parkland landscape.

The pedestrian routes beside the road offer an open aspect to the Pastoral Parkland. The car speeds will be curtailed by the narrow carrageway and the frequent turns. Shared surfaces will reduce the car speeds through the site. Towards the north the cars will enter the car park.

Within the wider site boundary of Hayes Park South Central and North there are opportunities to engage directly with the existing Parkland (with some established routes) or new routes with the Pastoral Parkland.

-  Pedestrian route through the site, using pavements or shared surfaces beside the road
-  Pedestrian route to each block, removed from the road.
-  Main square acts as a pin-wheel meeting space for all residents focused on pedestrian interaction

Main square meeting area for pedestrians

Proposed route through the site



Render plan showing the key pedestrian routes wider estate

**GLA Comments item 42, Addendum: Main Pedestrian routes through the site**

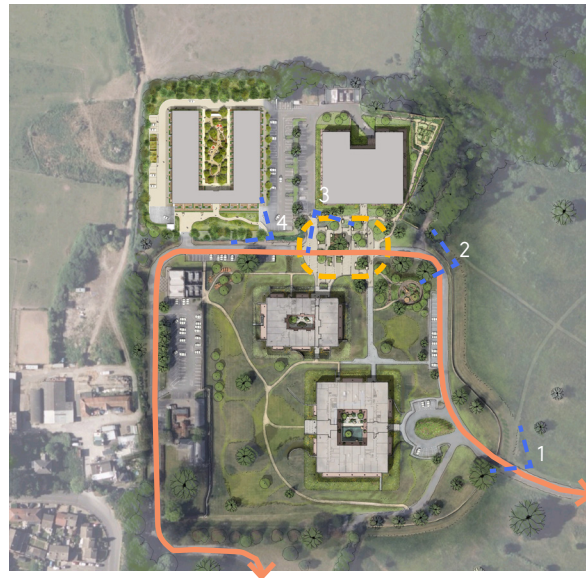
**Render and sketch views for Pedestrian walking through Hayes Park Pastoral Parkland landscape.**



Render view showing the pedestrian route on the site looking west



Sketch view of the main square looking south, showing the pedestrian priority with the site



Render view showing the pedestrian route on the site looking north towards Hayes Park West



Sketch view of Hayes Park West looking west, with pedestrians with the new landscape

## Cycle provision

### GLA Comments item 43, Addendum: Cycle Provision reviewed

The central cycle store is proposed within the lowered ground floor adjacent to the carpark.

The cycle store to HPW is accessed via the central courtyard externally or via the car park. In addition there is an external exit /access door to the eastern facade. The centralised store will be bright and welcoming.

A bike ramp will also be provided on one side of the central stair leading down from the podium level.

The short stay spaces are located with the landscape as shown on the plans.

#### HPW Long stay:

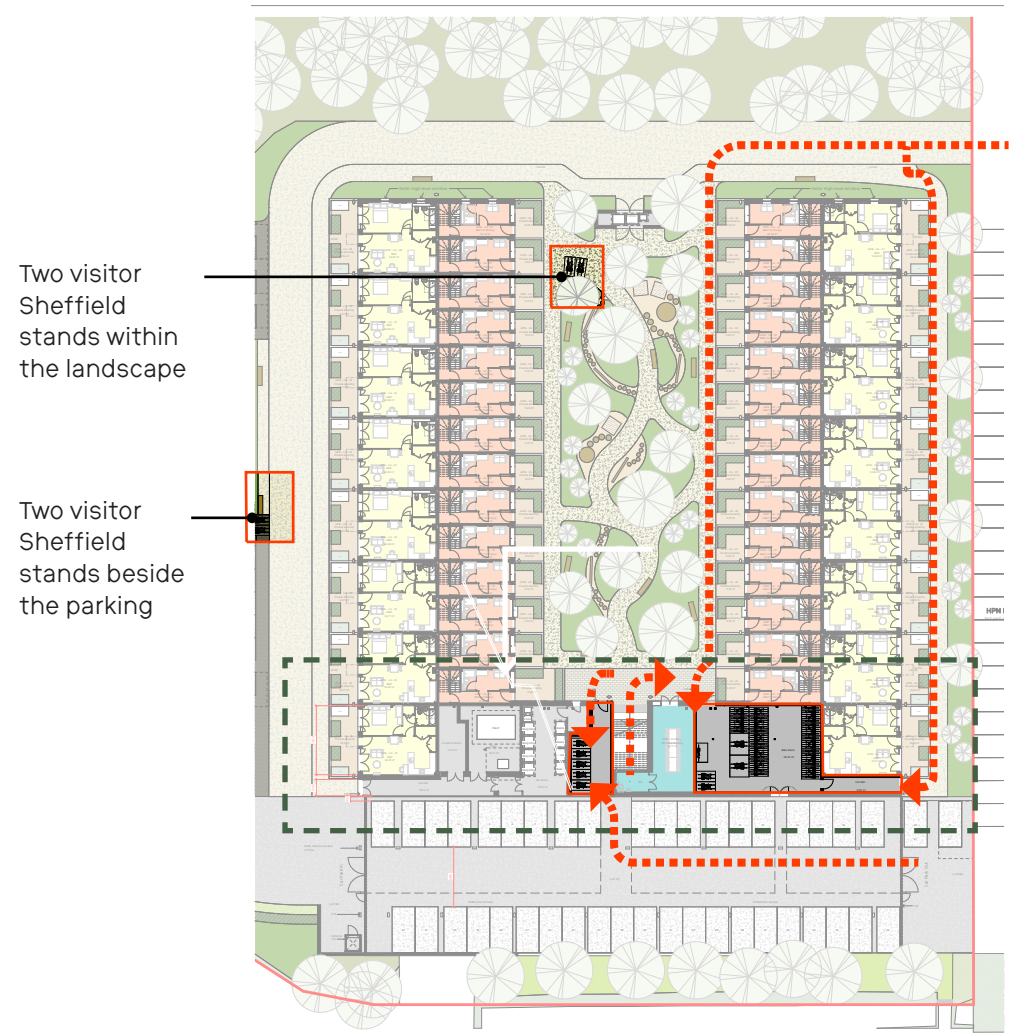
- 7 x Sheffield Stands – 14 spaces/cycles (5 covered beside the stair, 2 in cycle store) (14.4%)
- 3 x Enlarged Sheffield Stands – 5 spaces/cycles (within cycle store) (5%)
- 39 x Double Stackers (within cycle store) – 78 spaces (80.6%)

#### HPW Short stay:

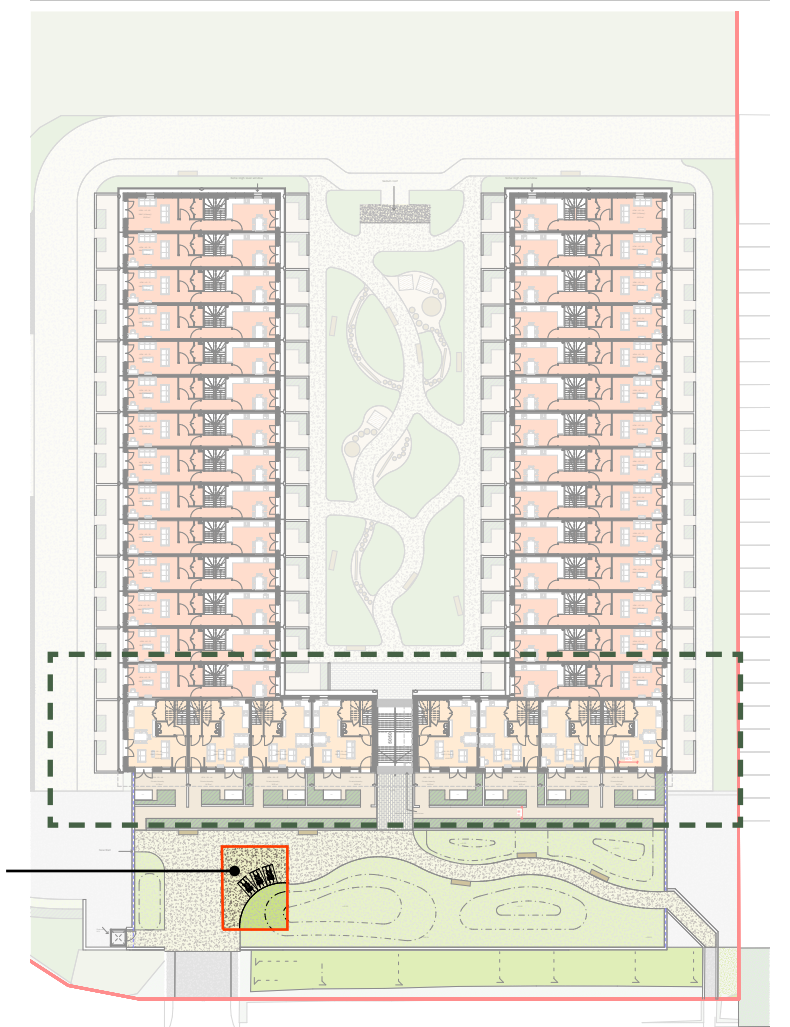
- 7 x Sheffield Stands – 14 spaces/cycles (100%)

#### Total Provision:

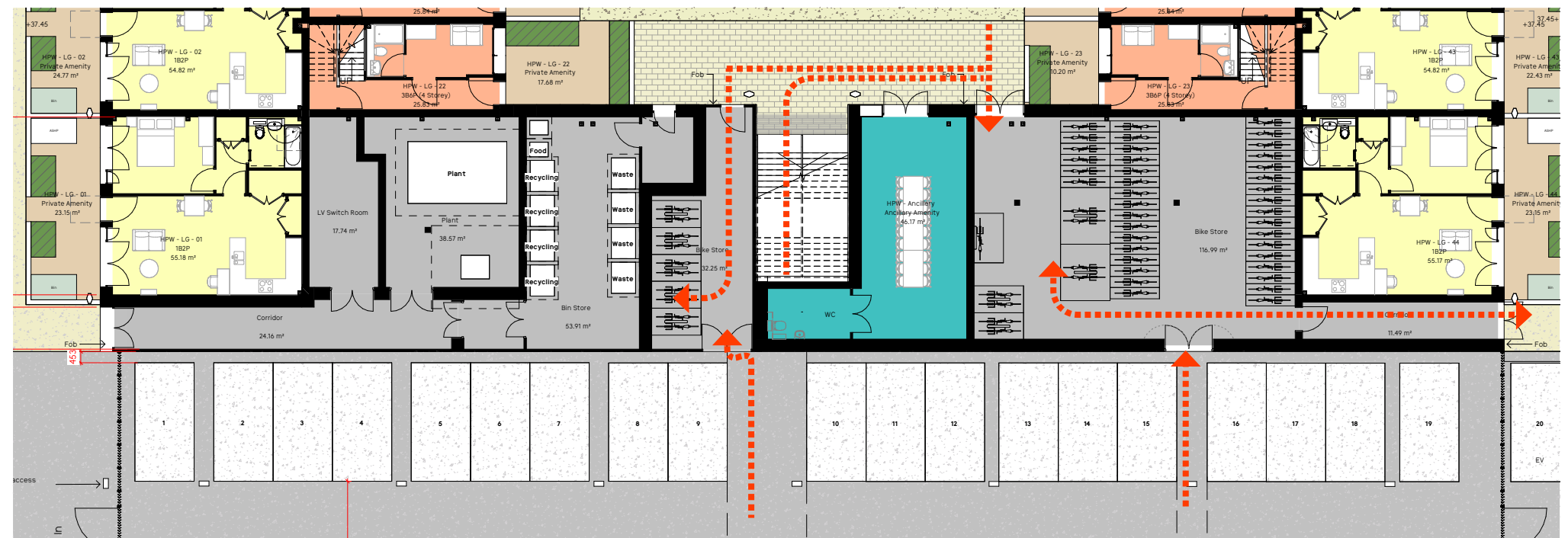
97 spaces long stay spaces  
14 Visitor spaces



Lower ground floor showing routes to cycle stores and visitor stands in the landscape



Upper ground floor showing visitor cycle stand



Lower ground floor showing routes to cycle stores, zoom in

Access to cycle store or visitor cycle store



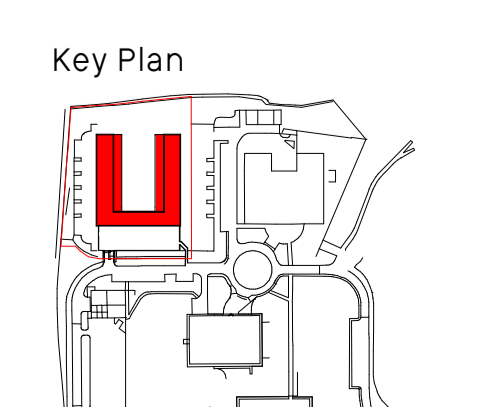




HPN Parking  
Not part of application

**General Notes**  
No implied or assumed dimensions. This drawing should not be used to estimate areas for the purposes of an application.  
Do not use this drawing for construction purposes. All dimensions to be checked on site by the contractor and such dimensions to be their responsibility.  
All work must comply with relevant British Standards and Building Regulations requirements. Drawing errors and omissions to be reported to the architect.

**Notes**  
**Unit Types**  
 182P  
 386P (3 Storey)  
 386P (4 Storey)  
 BOH  
 C3 Residential Ancillary  
 Application Boundary



**Proposed Lower Ground Floor Plan**  
 Client: Shall Do Hayes Developments Ltd  
 Scale: BA0  
 Date: 30/10/2025  
 Project No.: 0489  
 Project Name: Hayes Park West  
 Drawn by: PJ  
 Checked by: GN

Rev	Date	Reason	CHK
P2	30/10/25	For Planning	
P1	20/10/25	For Planning	

Drawing Number: 0489-SCW-HPW-01-DR-A-00110 Rev: P2



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