



NOVEMBER  
2025

# Planning Statement

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

Iceni Projects Limited on behalf of  
Shall Do Hayes Developments Ltd

November 2025

ICENI PROJECTS LIMITED  
ON BEHALF OF SHALL DO  
HAYES DEVELOPMENTS  
LTD

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



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### 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 Ltd ('the Applicant'), in support of an application for full planning permission for the proposed development at Hayes Park West, Hayes End Road, Hayes, UB4 8FE ('the site').
- 1.2 Hereafter referred to as the proposed development, this application seeks detailed planning permission and listed building consent for:

***'Partial demolition and redevelopment of the existing multi-storey car park to provide new homes (Use Class C3), landscaping, car and cycle parking, and other associated work.'***

- 1.3 The proposed development represents the final phase in the comprehensive regeneration of the Hayes Park estate. Following planning approvals at Hayes Park North (HPN), Hayes Park Central (HPC), and Hayes Park South (HPS), the Site offers a unique opportunity to sensitively complete this transition from a redundant mid-century office campus to a sustainable residential community.
- 1.4 The proposals will deliver 52 new homes within a carefully designed four-storey courtyard building, with a focus on family housing provision. The proposed development will be supported by new green infrastructure, biodiversity and landscape enhancements, and high-quality amenity provision including private gardens, roof terraces, communal spaces, and doorstep play.
- 1.5 The proposed development has evolved through extensive engagement with the London Borough of Hillingdon ('the Council'), the Greater London Authority ('GLA'), Historic England, and other stakeholders. The proposed development has responded positively to feedback throughout the pre-application process and demonstrates how well-considered design and reuse of previously developed land within the Green Belt can deliver high-quality, policy-compliant new homes while enhancing the setting of adjacent listed buildings.
- 1.6 The purpose of this Planning Statement is to provide the London Borough of Hillingdon ('the Council' / 'LBH') with an overall summary of the Site and its context, a review of the relevant planning history, and a robust justification for the proposed development in the context of the adopted Development Plan, the National Planning Policy Framework (December 2024), and other material considerations. This Planning Statement demonstrates that the proposed development offers a wide range of planning, design and sustainability benefits, including:

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- Full alignment with the Economic, Social and Environmental objectives of the NPPF, delivering development on previously developed land that supports sustainable growth, housing delivery, and environmental enhancement.
- The sensitive redevelopment of a redundant multi-storey car park, which currently detracts from the character and setting of the adjacent Grade II\* listed buildings. The proposed development will enhance this setting through thoughtful design, high-quality materials, and a carefully structured landscape strategy that responds directly to the historic and pastoral character of the wider Hayes Park estate.
- The delivery of 52 new homes, with a strong focus on family housing, directly addressing a key local housing priority for the Council. The proposed development includes a mix of 1-bedroom and 3-bedroom homes, all set within a highly landscaped, tenure-blind and characterful scheme.
- The proposed development includes the delivery of 15% affordable housing, with a tenure mix of 70% Social Rent and 30% Shared Ownership, in line with both London Plan and Hillingdon policy objectives. These homes are fully tenure-blind and integrated within the scheme, offering the same quality of design, amenity and access as market units.
- The Applicant is committed to securing the delivery of the previously approved listed building consents for Hayes Park Central and Hayes Park South through the Section 106 Agreement. This will ensure the continued conservation, restoration and reuse of these Grade II\* listed buildings as part of a coherent and unified estate.
- The Applicant is committed to exploring opportunities for managed public access to the Site through appropriately worded Section 106 Obligation, including to selected areas of ancillary communal space and the wider landscaped setting, in coordination with Open House or a comparable cultural organisation. This would enable the public to experience and appreciate the architectural and historic significance of the Grade II\* listed Hayes Park buildings and the distinctive parkland setting of the estate.
- Biodiversity and landscape improvements, replacing an extensive hard-surfaced car park with a high-quality landscape-led scheme that includes native planting, doorstep play, and a sensitive interaction with the surrounding landscape. The proposed development achieves a measurable Biodiversity Net Gain of 19.28% for area-based habitats, with a further 24.92% gain for hedgerows, comfortably exceeding the statutory 10% requirement.
- Encouragement of active and sustainable travel, including high levels of cycle parking and carefully designed pedestrian routes that link to the wider Hayes Park estate and local amenities,

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supported by car parking levels and EV charging provision that are proportionate and policy compliant.

- A deliverable and viable scheme that will contribute positively to local infrastructure, through the payment of CIL and other planning obligations in accordance with the Council's Planning Obligations SPD, while reinforcing the transformation of the Hayes Park estate into a sustainable residential neighbourhood.

## Submission Documents

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1.7 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>	
Air Quality Assessment	NRG
Circular Economy Statement	Hoare Lea
Outline Construction Logistics Plan	Iceni Transport
Daylight, Sunlight and Overshadowing Assessment	Development and Light
Delivery and Servicing Plan	Iceni Transport
Environmental Report	Avison Young
Ecology and Biodiversity Report	Greengage
Energy and Sustainability Statements	Hoare Lea
External Lighting Plan	Light Pad
Financial Viability Assessment	Aspinall Verdi
Fire Statement	Hoare Lea

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Flood Risk and Drainage Assessment	Whitby Wood
Heritage, Townscape and Visual Impact Assessment	Iceni Heritage
Housing Needs Study	Iceni Economics
Noise and Vibration Impact Assessment	NRG
Operational Waste Management Plan	Iceni Futures
Site Waste Management Plan	Iceni Futures
Overheating Report	Hoare Lea
Statement of Community Involvement	Iceni Engagement
Transport Assessment (inc. Travel Plan)	Iceni Transport
Tree Survey and Report	TMA
Utilities Report	Hoare Lea
WLC Statement	Hoare Lea

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## 2. APPLICATION SITE AND BACKGROUND

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### Site Description

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2.1 The Site comprises approximately 1.1 hectares of previously developed land within the Hayes Park estate, located off Hayes End Road, in the Charville Ward of LBH. The Site currently accommodates a redundant multi-storey car park, formerly associated with the historic commercial function of the wider Hayes Park campus.

2.2 The car park structure comprises two levels, including sunken elements. It is now entirely obsolete, following the cessation of office use across the estate and the reconfiguration of parking associated with new residential permissions at Hayes Park North, Central, and South. The structure is visually and functionally disconnected from the emerging residential character of the estate and makes a negative contribution to the setting of the adjacent heritage assets and surrounding landscape.

2.3 The Site is bound to the:

- North and west by mature trees and private open parkland, owned by the Church Commissioners;
- East by the Hayes Park North (HPN) building;
- South by the Grade II\* listed buildings of Hayes Park Central (HPC) and Hayes Park South (HPS).

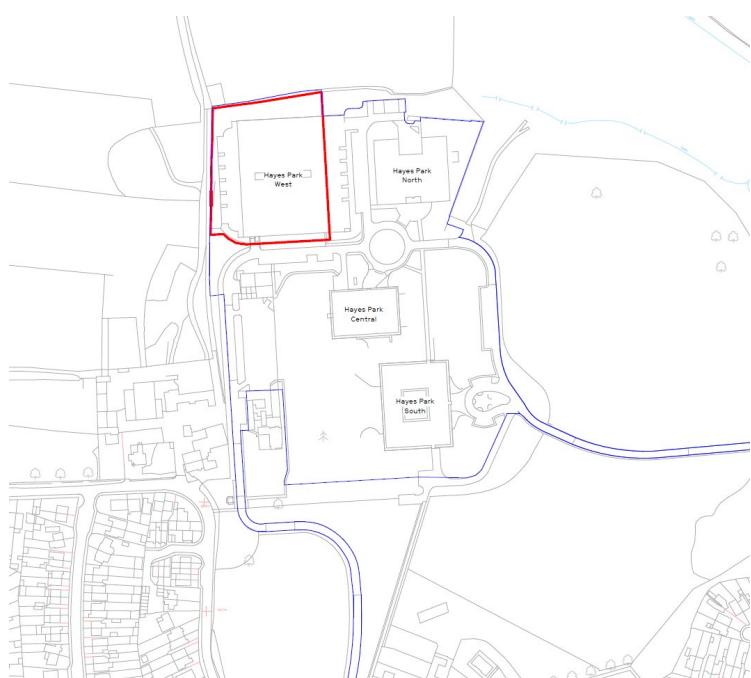


Figure 1- Hayes Park Site

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2.4 The Site lies within the Green Belt, and within the Hillingdon Air Quality Management Area (AQMA). It is not subject to any other land use designations, nor does it lie within a conservation area or heritage designation in its own right. The Site lies in Flood Zone 1 and is therefore at low risk of flooding.

2.5 The surrounding area is predominantly residential and suburban in character, with good access to a range of public amenities and green spaces, including:

- Hayes End Recreation Ground.
- Park Road Green and Belmore Playing Fields.
- Local shops and services at Hillingdon Heath Local Centre (1.6km).
- Public transport connections via Hayes & Harlington Station (Elizabeth Line) and Uxbridge Road bus corridors.

2.6 The Hayes Park estate is located in a sustainably accessible location, with the proposed development seeking to optimise this potential through sustainable design and transport measures.

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### **Hayes Park Estate**

2.7 The Hayes Park estate is a distinctive former office campus, originally designed by renowned American architect Gordon Bunshaft in the 1960s for HJ Heinz Ltd. It is structured around a pastoral landscape, with three principal buildings:

- Hayes Park North (HPN) – a modern office building from the early 2000s;
- Hayes Park Central (HPC) and Hayes Park South (HPS) – two mid-century office buildings of significant architectural and historic interest, now Grade II\* listed.

2.8 The transformation of Hayes Park from a single-use office park into a high-quality residential community is already well advanced. Planning permissions have been secured for the conversion of all three buildings:

- HPN was granted prior approval in 2022 (Ref: 12853/APP/2021/2202) for 64 homes, with follow-up approval for external enhancements (Ref: 12853/APP/2023/3720) and material amendment to increase to 70 homes (12853/APP/2024/1374). These works are now on site and under construction.

- HPC and HPS were granted full planning permission and listed building consent in early 2024 (Ref: 12853/APP/2023/1492) for their conversion to 125 homes, along with substantial landscape and public realm enhancements.

2.9 Together, these permissions will deliver 194 new homes, forming the basis of a new residential neighbourhood within the estate.

2.10 The transformation of Hayes Park has been guided by a clear and consistent design vision from the outset, underpinned by a site-wide masterplan developed collaboratively by Studio Egret West, the Applicant, and the London Borough of Hillingdon. This framework has informed every phase of redevelopment across the estate, from Hayes Park North through to the current proposals at Hayes Park West, ensuring a coherent architectural and landscape strategy rooted in the modernist principles of Gordon Bunshaft's original composition. The masterplan approach establishes a unifying palette of materials, massing and landscape character, creating a "family of buildings" that are individually distinctive yet clearly related in form, proportion and rhythm. This coordinated approach has enabled each phase to complement its neighbours, reinforcing the visual hierarchy of the listed buildings while embedding new development seamlessly within the pastoral setting of the estate.

### Planning History

2.11 The LBH planning register does not display and planning history for the Site. However relevant here are the various planning applications across the wider Hayes Park site 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 North	12853/APP/2024/1374	S73 Application to alter layouts, unit mix, and add 6 additional units to Prior Approval 12853/APP/2021/2202.	31/07/2024
	12853/APP/2021/2202	Prior approval for change of use from office to 64 residential units (Class O).	23/06/2022
	12853/APP/2023/3720	External enhancements to Hayes Park North following residential conversion approval.	15/12/2023

Location	Reference	Description	Date
	12853/APP/2024/1374	Section 73 application to in order to add 6 additional units, amend the unit mix, make internal layout changes to 12853/APP/2021/2202	31/07/2024
Hayes Park Central & South	12853/APP/2023/1492	Full planning permission and listed building consent for the conversion of both Grade II* listed buildings to 124 homes, with associated landscape and public realm works.	05/02/2024

#### **Pre-Application Advice (December 2024 – September 2025)**

2.12 The Applicant has engaged in a structured and sustained programme of five pre-application consultation meetings with the London Borough of Hillingdon. The process has also included dedicated meetings with the Greater London Authority and a workshop with Historic England, enabling a coordinated design and planning response.

2.13 Throughout this dialogue, officers emphasised the importance of addressing the Site's Green Belt designation, the setting of adjacent listed buildings, and the architectural integrity of the emerging Hayes Park estate. In response, the Applicant has undertaken detailed visual and townscape testing, including tree canopy height studies, summer/winter visibility assessments, and fixed viewpoint modelling. These have directly informed reductions in massing, refinement of the podium and courtyard strategy, and the articulation of the proposed development as part of a coherent "family of buildings" across the estate. The architectural language, landscape integration and typology have all evolved through an iterative process, demonstrating a collaborative and proactive approach to achieving a high-quality outcome.

#### **Principle of Development**

2.14 Officers acknowledged that the Site represents previously developed land within the Green Belt and is appropriate for redevelopment under Paragraph 154(g) of the NPPF (2024) and strongly supported the principle of a change in use of the Site to provide a residential building.

2.15 In response, the Applicant is submitting a series of verified views agreed with the Council that allow for an accurate before and after assessment of the proposed development in relation to their impact on openness. Also, there is a dedicated section in the accompanying HTVIA that assesses the impact on openness. This Planning Statement includes a full assessment of the proposed development against National and Local Green Belt policy.

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## **Townscape, Design and Landscape**

2.16 Officers at the Council, alongside the GLA and Historic England, emphasised the importance of delivering a building that integrates visually and physically with the unique landscape character of Hayes Park and the setting of its Grade II\* listed buildings. Particular concerns were raised in relation to the Site's location within the Green Belt, the visibility of new built form from key views, and the need to avoid any visual dominance or massing that would challenge the architectural hierarchy of the existing Hayes Park buildings.

2.17 In response, the design team undertook a structured programme of visual and townscape testing, including a detailed assessment of tree canopy heights, summer and winter visibility, and fixed and dynamic views from around the estate. These studies directly informed reductions to building height and massing, ensuring that the proposed four-storey building would remain comfortably below the established tree line and subservient to the listed buildings. The layout was revised to increase separation between building blocks, improve permeability through the Site, and preserve key view corridors across the parkland.

2.18 The Council encouraged a design response that would form part of a "family of buildings" visually coherent with Hayes Park Central and South, but architecturally distinct and respectful of their historic character. This led to refinements in material treatment, proportions, and articulation, including a simplified horizontal emphasis, sculpted corners, and the use of deep reveals and jointing to create a sculptural and rhythmical built form. The massing was broken down into three clear wings, which not only support legibility and resident experience but also reduce visual bulk when viewed across the park.

2.19 Officers also advised that the courtyard and podium strategy should be simplified and more clearly integrated with the surrounding landscape. In response, the landscape approach evolved to prioritise planting, biodiversity and visual softness. The courtyard design was restructured to offer clear sightlines, accessible routes and generous doorstep play, while the podium edge was softened with native hedgerows and vertical planting. These measures serve to reduce the perceived scale of the built form and deliver a scheme that is clearly grounded in the landscape character of the wider Hayes Park estate.

2.20 Overall, this aspect of the proposed development has been shaped through an iterative and collaborative process, responding directly to officer and stakeholder feedback, and demonstrating a clear commitment to delivering a development that is well-integrated, proportionate and sensitive to its historic and landscape context.

## **Heritage and Setting of Listed Building**

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2.21 The Council and Historic England were clear that any proposal must respond sensitively to the setting of these assets, recognising their significance as part of a wider designed parkland landscape. Officers acknowledged that the existing car park does not make a positive contribution to this setting but raised concerns that new visible built form could introduce harm if the scale, massing or alignment disrupted the architectural hierarchy or spatial arrangement of the original composition.

2.22 In response, the design team has worked closely with the Council and Historic England to develop a strategy that seeks to enhance the setting of the listed buildings. Key changes included a reduction in height, stronger horizontal expression, and simplified architectural language that clearly distinguishes the new building as a contemporary but respectful addition. The design avoids pastiche while reinforcing proportional harmony with its neighbours. Public realm and landscape treatments were revised to re-establish the openness and character of the original campus setting, with views between buildings preserved and strengthened through massing articulation and tree management. A Heritage Statement detailing Heritage Benefits and including a Visual Impact Assessment accompany this application to evidence the outcome of these refinements and the limited level of heritage harm anticipated.

### **Residential Quality**

2.23 Council officers reviewed the residential quality of early layouts, raising concerns about the design of duplex and triplex units, privacy for ground-floor gardens, and the balance between dual and single aspect homes. Feedback also focused on equitable access to amenity space and tenure-blind integration of affordable units. Officers welcomed the emphasis on family housing but sought greater clarity on how unit types and layouts could better respond to resident needs and site context.

2.24 All units meet or exceed the Nationally Described Space Standards (NDSS) and benefit from generous internal layouts, coherent vertical circulation, and efficient shared cores. The three residential cores serve no more than eight units per floor, and layouts have been refined to provide clear, legible circulation and defensible space at ground level.

2.25 The proposed development exceeds amenity space standards, providing private balconies, terraces, and gardens for all homes, alongside a large, shared courtyard that incorporates play, seating and planting. The courtyard is directly accessed by family units at ground level and overlooked by upper-floor flats, providing strong passive surveillance.

### **Access, Parking and Transport**

2.26 Officers highlighted the need to minimise car parking in accordance with the London Plan, and to ensure servicing, emergency access, and pedestrian and cycle routes were clearly and safely accommodated. Specific feedback focused on fire access, refuse collection strategy, and the visibility

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and convenience of active travel infrastructure. A strong preference was expressed for concealing car parking within the existing basement footprint and avoiding hard surfacing at grade.

- 2.27 The design team has responded comprehensively. All 52 car parking spaces are located within the retained and modified basement car park, including 3 accessible bays and provision for 12 electric vehicle (EV) spaces, in accordance with London Plan standards. Vehicular access is provided via two existing points: one to the upper level (via Hayes Park Road) and one to the basement (via the Hayes Park North access road). A fully tracked swept path analysis demonstrates safe manoeuvring for fire appliances, refuse vehicles and delivery vans at both levels.
- 2.28 Cycle parking provision totals 97 long-stay and 4 short-stay spaces, provided in secure, covered storage areas located adjacent to entrances to maximise usability. Pedestrian access has been carefully designed to be intuitive, legible and step-free, with new connections to Hayes Park North and the wider estate. The landscape strategy promotes permeability and pedestrian priority, integrating gently sloped routes, tactile paving, and clear wayfinding. The proposed development is supported by a full Transport Assessment, Travel Plan, Delivery and Servicing Plan, and Car Park Management Plan that respond to officer and TfL expectations.

### **Sustainability**

- 2.29 Officers emphasised the need for energy infrastructure, including rooftop PV and plant, to be fully integrated into the design and massing of the building. Early clarity on the rooftop strategy was encouraged to avoid later design compromises.
- 2.30 The Applicant has addressed this by developing a coordinated rooftop plant and energy strategy, including discreetly located PV panels and ASHPs. These have been designed as part of the roofscape and are visually integrated into the massing and visual assessments. A Circular Economy Statement, Whole Life Carbon Assessment and Overheating Assessment accompany this application and demonstrate the Site's strong sustainability credentials.
- 2.31 The Applicant has responded constructively to this feedback throughout the design process. Pre-application comment has been addressed through the submitted drawings and supporting documentation, and the final scheme reflects a careful balancing of policy objectives, design quality, and local context.

### **GLA Feedback**

- 2.32 The proposed development was presented to the GLA at a formal pre-application meeting on 17 July 2025. Officers confirmed that the Site could benefit from the exception set out at Paragraph 154(g)

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of the NPPF, relating to previously developed land in the Green Belt, provided that there is no significant impact on openness.

2.33 The GLA acknowledged that the proposed building would be read as part of the “family” of existing buildings within the Hayes Park estate and that the courtyard arrangement and sunken lower ground floor would help mitigate its visual impact. However, they advised that further visual impact assessment would be required to fully test the degree of harm to openness.

2.34 GLA officers were broadly supportive of the reuse of previously developed land and the evolution of the masterplan, particularly the architectural approach which draws on the language of the surrounding listed buildings. They expressed reservations around the proposed single-aspect homes and would expect robust justification as to why this was the optimum design approach.

2.35 Officers also advised that the affordable housing offer would need to be robustly justified through a viability-tested route, in line with Policy H6 of the London Plan. Officers encouraged continued engagement with the Council on play space distribution, transport arrangements (including car parking), and urban design ahead of submission

### **Historic England Feedback**

2.36 As part of the pre-application process, the Applicant engaged with Historic England in relation to the potential impact of the proposed development on the setting of the adjacent Grade II\* listed buildings. A virtual meeting was held on 13 June 2025, followed by the submission of updated visual material. Historic England confirmed in their formal written advice (dated 18 July 2025) that they had no in-principle objections to the proposed development, which they acknowledged would replace an unsightly car park that currently detracts from the setting of the listed buildings. They welcomed the design approach taken by SEW, which draws on the scale and proportions of the heritage assets, and considered that any impact on their significance would be low. Historic England encouraged the development of a landscape strategy that further reinforces the parkland character of Hayes Park and enhances the setting of the heritage assets.

### **Community Engagement**

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2.37 In line with national guidance and best practice, the Applicant has undertaken a proportionate and transparent programme of pre-application engagement with the local community and elected representatives to inform the proposed development.

2.38 This engagement built on earlier consultation undertaken in relation to Hayes Park Central and Hayes Park South, for which planning permission was granted in early 2024. The approach to

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engagement for Hayes Park West has drawn on lessons from this previous process and sought to maintain a consistent and constructive dialogue with stakeholders.

2.39 A range of consultation methods were deployed to raise awareness of the proposed development and seek local feedback. These included:

- Leaflet Distribution: A community newsletter was delivered on 19 June 2025 to 731 local homes and businesses, outlining the emerging proposals and inviting feedback via email or post. The leaflet contained 3D sketches, a project summary, and details for contacting the project team.
- Online Consultation: A dedicated consultation website – [www.hayesparkconsultation.com](http://www.hayesparkconsultation.com) – was used to advertise details of the forthcoming proposals Hayes Park West, inviting comment from local people. This included 3D imagery, development information, and an online feedback form. As of submission, the website had received 316 views.
- Councillor Engagement: On 10 June 2025, local ward councillors (Cllrs Davies and Nelson-West), as well as the Leader and Deputy Leader of the Council, were notified of the emerging proposals and invited to meet with the project team.

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### 3. PROPOSED DEVELOPMENT

3.1 This application seeks full planning permission for the redevelopment of Hayes Park West, which currently comprises a redundant two-storey multi-storey car park formerly associated with the historic commercial use of the wider Hayes Park estate.

3.2 The description of development is as follows:

***'Partial demolition and redevelopment of the existing multi-storey car park to provide new homes (Use Class C3), landscaping, car and cycle parking, and other associated work.'***

3.3 The proposed development has been designed by Studio Egret West and comprises the following key elements:

- The change of use of the Site from existing ancillary Class E(g)(i) to Residential Class C3;
- The construction of a four-storey residential building in a courtyard arrangement, following partial demolition of the upper levels of the existing car park;
- 52 new homes (Use Class C3) including a mix of 1 and 3-bedroom units all units benefiting from excellent daylight, private amenity space, and generous internal space standards;
- 15% affordable housing delivered at 70% social rent and 30% shared ownership tenure split;
- A total of 3,741sqm of amenity provision, including:
  - 1,962sqm of private external space (gardens, balconies, terraces);
  - 1,733sqm of external communal space;
  - 46sqm of internal communal space; and
  - 161sqm of doorstep play space.
- A new landscaped courtyard at the heart of the development, offering accessible play, planting and social spaces;
- 52 car parking spaces, including 3 accessible bays and 12 active electric vehicle (EV) bays, all located within the retained basement structure;

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- 97 long-stay cycle parking spaces and 10 visitor spaces, exceeding the minimum policy requirement and delivered through a secure and covered bike store;
- Dedicated refuse and servicing infrastructure, with fully tracked access for waste vehicles and fire tenders;
- New pedestrian links and landscape planting, connecting the Site to the wider Hayes Park estate and integrating with the existing parkland setting;
- Sustainable construction and energy strategy, including rooftop photovoltaic panels, air source heat pumps, urban greening measures, and a commitment to circular economy principles.

3.4 The proposed development delivers a majority of much needed family housing. The proposed dwelling mix is as follows:

**Table 3.1 Proposed Dwelling Mix**

Unit Type	Number of Homes	Percentage (%)
1B2P	16	31%
3B6P	36	69%

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## 4. AFFORDABLE HOUSING STATEMENT

- 4.1 The proposed development at Hayes Park West will deliver a total of 52 new homes. In accordance with the requirements of London Plan Policies H4 (Delivering Affordable Housing), H5 (Threshold Approach to Applications), and H6 (Affordable Housing Tenure), and Policies H2 and DMH7 of the Hillingdon Local Plan, the proposed development has been subject to a detailed Financial Viability Assessment (FVA), prepared by Aspinall Verdi which demonstrates the maximum reasonable level of affordable housing that the development can viably support.
- 4.2 The FVA concludes that the proposed development is capable of delivering 15% affordable housing by habitable room, equating to 8 affordable homes. The affordable provision will comprise a tenure mix of 70% Social Rent and 30% Shared Ownership, reflecting both the requirements of Policy H6 of the London Plan and local housing priorities identified by the Council.
- 4.3 The affordable homes are fully tenure-blind and integrated within the overall layout, benefitting from the same quality of design, amenity and access as market units.
- 4.4 The Applicant is committed to securing the affordable housing provision through a Section 106 Agreement, with the precise tenure mix and delivery arrangements to be agreed with the Council in accordance with the recommendations of the independent viability review. This represents the maximum reasonable level of affordable housing in viability terms and delivers a significant public benefit in the context of the wider regeneration of the Hayes Park Estate.

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## 5. PLANNING POLICY

5.1 Section 38(6) of the Planning and Compulsory Purchase Act (2004) 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 proposed development, and which provide the context for the consideration of this planning application, as well as other material considerations.

5.2 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)

5.3 Other material considerations include:

- National Planning Policy Framework (2024)
- National Planning Practice Guidance
- 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)

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

5.4 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.

5.5 The policies in Table 4.2 are relevant to the proposed development.

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**Table 5.1 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.

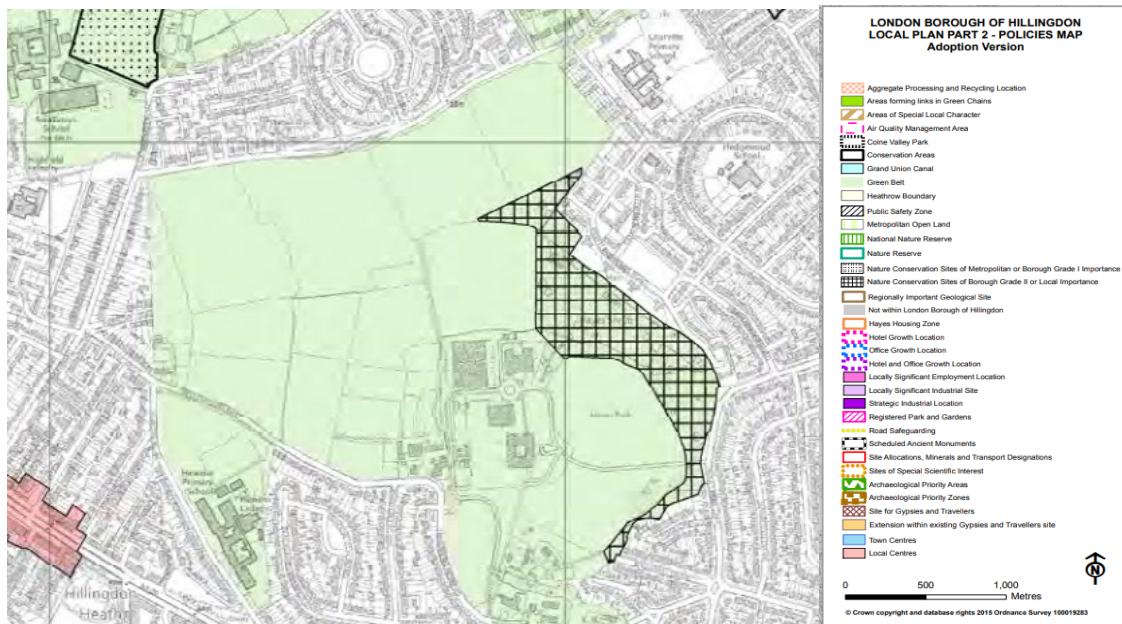
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**LPA Local Plan Part Two (2020)**

5.6 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.

5.7 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 5.2 Local Plan Designations**



5.8 In addition to the above, the policies in Table 5.4 are relevant to the proposed development.

**Table 5.3 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	<p>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.</p> <p>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.</p>
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 playspace 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 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)**

5.9 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 5.5 are relevant to the proposed development.

**Table 5.4 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, <i>inter alia</i> , that new development should seek to ensure a positive impact on biodiversity and secure net biodiversity gain.
Policy SI1	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 SI1	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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## 6. PLANNING ANALYSIS

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

6.2 The principle of residential development on the Site is strongly supported by national, regional, and local planning policy, particularly where it involves the efficient reuse of previously developed land and contributes to the delivery of much-needed housing in appropriate locations.

6.3 At the national level, the National Planning Policy Framework (NPPF, 2024) encourages a proactive and sustainable approach to planning. Paragraphs 7–9 set out the overarching objectives of the planning system, which include an economic objective to support housing delivery and efficient land use; a social objective to support strong and inclusive communities; and an environmental objective to enhance the built and natural environment. Paragraph 11 introduces a presumption in favour of sustainable development, and Paragraph 73 highlights the important contribution that small and medium-sized sites within existing settlements can make to meeting housing need. The Site, which comprises a long term redundant multi-storey car park formerly associated with the Hayes Park office campus, represents a highly suitable and logical opportunity for regeneration through residential use. It no longer serves a functional purpose, and its redevelopment offers a meaningful way to respond to national policy priorities for site optimised, design-led housing growth.

6.4 At the regional level, the London Plan (2021) identifies the delivery of new homes as a key strategic priority. Policy GG2 promotes the use of underutilised land, particularly where it can support well-designed development that integrates with the surrounding area. Policy H1 sets ambitious targets for housing delivery across London, supported by Policy H2, which emphasises the potential of small and medium-sized sites to deliver incremental but meaningful growth. The Site is well placed to contribute towards these objectives. It sits within a wider, consented residential estate, is bounded by clear physical features, and has been designed to respect and respond to the scale, massing, and setting of adjacent buildings, including nearby listed assets. The development optimises a disused footprint within a well-structured landscape, directly aligning with the design and optimisation principles of Policy D3 and the wider sustainability objectives of the Plan.

6.5 Locally, the Hillingdon Local Plan: Part 1 (2012) and Part 2 (2020) provide a clear framework for housing delivery across the borough. Policy H1 supports the delivery of new housing where it is compatible with local character, enhances accessibility, and improves the environment. The Council

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recognises the role of brownfield land in meeting housing need, particularly in a borough with extensive Green Belt coverage. The Site no longer serves the former commercial functions of the Hayes Park estate, and its redevelopment has been discussed in detail through the pre-application process with officers. The Council has confirmed that the car park is redundant, visually and functionally disconnected from its surroundings, and suitable for redevelopment for housing subject to detailed assessment. Officers have also noted the potential for the proposed development to deliver broader planning benefits, including high-quality family homes, affordable housing, improved design integration, and enhanced biodiversity.

6.6 In this context, the proposed residential use of the Site is considered wholly appropriate in principle. It would positively contribute to meeting local and regional housing need, support the Council's spatial strategy for delivering homes on brownfield land, and bring a redundant and underperforming site back into active use. The proposed development aligns with the overarching direction of planning policy at all levels and represent a sustainable and well-considered evolution of the Hayes Park estate.

#### **Housing Need**

6.7 A comprehensive assessment of housing need and land supply has been prepared by Iceni Projects to accompany this application. That report provides detailed analysis of London-wide and local housing needs, delivery performance, and housing mix justification and informs the following analysis.

6.8 The acute and growing need for housing at national, regional, and local levels provides compelling support for the principle of residential development at Hayes Park West. National planning policy is explicit in its expectation that local authorities take positive steps to significantly boost the supply of homes. The NPPF reiterates this commitment, with Paragraphs 7–9 identifying housing delivery as a key means of achieving sustainable development, and Paragraph 11 confirming that planning decisions should apply a presumption in favour of sustainable development. The recent reforms to the NPPF and Standard Method in December 2024 have reinforced this direction, making clear that the shortfall in housing delivery must be addressed as a matter of urgency through the identification of suitable sites and proactive decision-making.

6.9 This national context is reflected in London's own housing crisis. The Standard Method calculation, updated in April 2025, identifies a housing need of 86,082 homes per annum across London, a figure that is 64% higher than the current London Plan target of 52,287 dwellings per annum 'dpa', itself a capacity-based figure that falls well short of actual need. This gap has been long-standing: housing delivery has consistently failed to meet need over several London Plan cycles, and delivery is now falling year-on-year, with completions in 2024/25 projected to drop below 30,000 units - levels not seen since the global financial crisis. The GLA's own consultation document Towards a New London

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Plan recognises the need to review the Green Belt in order to meet London's needs, further underlining the scale of the challenge.

- 6.10 Within this regional picture, the housing situation in Hillingdon is particularly stark. The current London Plan (2021) target for Hillingdon is 1,083 dpa, but the borough's need under the updated Standard Method is now 2,285 dpa, meaning the Council is currently planning to meet less than half of its actual need. Meanwhile, completions have fallen sharply: in 2024/25, only 578 dwellings were completed, the lowest number since 2010/11. Against its London Plan target, Hillingdon has delivered 1,011 fewer homes than required over the past six years. Against its actual need, the gap is far wider - Hillingdon's housing delivery currently averages around 578 homes per year against an objectively assessed need of 2,285 homes per year, representing a shortfall of approximately 1,700 homes annually, or a delivery rate meeting only one quarter of identified need.
- 6.11 On current projections taken from the Iceni Projects Housing Need and Supply Review (2025), and with the expiry of the London Plan (2021) targets in 2026, next year Hillingdon will be able to demonstrate only 1.3 years of housing land supply against the target 5, significantly below the NPPF requirement and triggering the presumption in favour of sustainable development under Paragraph 11(d).
- 6.12 The nature of housing need in Hillingdon also demands attention. The borough's market housing stock is dominated by family homes with 62% of market homes having 3 or more bedrooms, but recent housing delivery has skewed dramatically toward smaller units. In the last five years, just 48 family homes (3+ bed) have been delivered per year on average. Over the last ten years, this number falls to just 36. This has left an overwhelming imbalance between supply and demand: while 82% of the market need is for family homes, only 12% of recent completions have been of that size.
- 6.13 The proposed development responds directly and positively to this challenge. Of the 52 homes proposed, 36 (69%) are family-sized units (3 bedrooms), a level of delivery that matches the borough's average annual delivery of family homes over the past decade and would effectively deliver a year's worth of borough-wide family housing supply on a single site. The proposed development therefore makes a significant positive contribution to meeting a clear and long-standing shortfall in family housing provision, and represents a significant planning benefit of the proposed development. It does so in a location that is particularly well-suited to larger homes, being outside a town centre, with lower PTAL, and adjacent to extensive green space and play areas.
- 6.14 In summary, the housing crisis in London and Hillingdon is well-documented and urgent. There is a significant shortfall against targets and need, with delivery stagnating, approvals falling, and the future pipeline uncertain. The proposed development at Hayes Park West offers a timely, appropriate and policy-aligned response, bringing forward high-quality, family homes on previously developed land and helping the borough address the pressing housing challenges it faces.

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### **Development in the Green Belt**

6.15 The Site lies within the Green Belt, where development is generally regarded as inappropriate unless it meets one of the exceptions set out in the NPPF. Paragraph 154(g) of the NPPF allows for the redevelopment of previously developed land in the Green Belt provided the proposal would not have a substantial impact on the openness of the Green Belt. Through pre-application engagement, both the Council and the GLA have confirmed that Paragraph 154(g) represents the most appropriate policy test.

6.16 The Site currently accommodates a redundant two-storey car park formerly associated with the commercial use of the Hayes Park estate. Its operational role has ceased and it contributes neither to the function of the estate nor to the wider open character of the landscape. The proposed development maintains the existing building footprint and site boundaries, avoiding any encroachment into the surrounding open parkland. The height and scale of the new development have been carefully calibrated to remain within the visual context of surrounding tree canopies and to remain subservient to adjacent built form.

6.17 The proposed development has been developed through extensive pre-application dialogue with the Council, the GLA and Historic England, with a focus on integrating the new building into the existing architectural and landscape character of Hayes Park. The resulting design adopts a courtyard typology and employs materials and proportions that reflect those of the adjacent Grade II\* listed Hayes Park Central and South buildings, creating a coherent "family of buildings" across the estate. Gaps between building blocks, articulated massing, and visual permeability ensure that key views through to the surrounding parkland are preserved and enhanced.

6.18 The proposed development also delivers a comprehensive landscape strategy, replacing areas of hardstanding with native planting, trees, green infrastructure, and sustainable drainage features. This significantly increases green cover and softens the visual presence of the building within the parkland setting. These measures are intended not only to mitigate visual impact but to actively enhance the Site and its surroundings.

6.19 The openness and visual qualities of the Green Belt have been key considerations in the evolution of the scheme. The Heritage, Townscape and Visual Impact accompanying the application confirms that the existing multi-storey car park detracts from the character and openness of Hayes Park, introducing an inactive and utilitarian built form within the parkland setting. By contrast, the proposed development will replace this structure with a well-designed, low-rise building that integrates into the landscape, delivering a moderate beneficial townscape effect and no adverse impact on Green Belt openness.

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6.20 The HTVIA identifies that the development will sit comfortably within the established campus composition, maintaining proportional relationships with Hayes Park Central and Hayes Park South (Grade II\*). The new building's height, ranging from three to four storeys and remaining below 50m AOD, ensures that it does not break the historic skyline or project above the surrounding tree canopy. Verified views demonstrate that the scheme is largely screened by existing vegetation, with only limited glimpsed visibility from within Hayes Park and no visibility from Mellow Lane East or Charville Lane in summer months. In winter, visibility marginally increases, yet even then the proposed building reads as a contextual and proportionate addition, with the overall effect assessed as Minor to Moderate Beneficial to visual receptors.

6.21 In accordance with London Plan Policy G2 and Hillingdon Local Plan Policy DMEI 4 (Development on the Green Belt or Metropolitan Open Land), the redevelopment of previously developed land is acceptable where it would not have a greater impact on openness than the existing built form and delivers environmental enhancement. The HTVIA confirms that the proposal achieves precisely this outcome, reducing visual clutter, consolidating built mass within the existing footprint, and introducing extensive new soft landscaping and tree planting that strengthens the estate's parkland character.

6.22 In summary, the proposed development does not significantly impact the openness of the Green Belt and is therefore not considered to be inappropriate development under Paragraph 154(g) of the NPPF. This also aligns with relevant policies of the London Plan (Policy G2) and the Hillingdon Local Plan DMEI 4, which support the sensitive redevelopment of previously developed land where this can deliver high-quality, sustainable outcomes that preserve the characteristics of the Green Belt.

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## **Housing Provision**

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### **Housing Mix**

6.23 Delivering a balanced and appropriate mix of housing types is a core objective of planning policy at all levels. National, regional and local frameworks emphasise the need to create mixed, inclusive communities and ensure that housing typologies respond to identified local need.

6.24 At the national level, the NPPF (2024) sets out, in Paragraph 63, that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. Paragraph 69 confirms that planning decisions should support the development of well-designed homes on suitable sites that respond to local needs, including those of families with children, older people and first-time buyers. The Framework encourages the use of up-to-date evidence to guide housing mix, and supports development that contributes to creating inclusive and diverse places.

6.25 The London Plan (2021) reinforces this approach. Policy H10 (Housing Size Mix) requires that housing developments offer a range of unit sizes and that this mix should be informed by robust local

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evidence of housing need. While the Plan does not prescribe a strategic mix, it expects boroughs to define local needs through SHMAs (Strategic Housing Market Assessments) and to prioritise family housing in appropriate locations, particularly outside of town centres and in areas with lower PTAL where larger homes can be better accommodated. Policy GG4 (Delivering the Homes Londoners Need) also places strong emphasis on delivering genuinely mixed and balanced communities, with a range of unit sizes and tenures.

6.26 At the local level, Hillingdon Local Plan: Part 1 (2012) Policy H1 supports the delivery of a mix of housing types and tenures that reflect the needs of Hillingdon's residents. Local Plan Part 2: Policy DMH 2 requires development to contribute towards a mix of housing units of different sizes in line with identified need, with particular emphasis on the delivery of family housing. This position is supported by the borough's Strategic Housing Market Assessment (SHMA), which identifies a significant shortfall in larger family homes, and recommends that 82% of market housing need be met through homes of 3 or more bedrooms. As noted in the supporting Housing Need and Supply Review, Hillingdon has delivered only 36-48 family homes per year on average over the past decade, and recent schemes have tended to over-deliver smaller units at the expense of 3-bed+ homes.

6.27 In this context, the proposed development at Hayes Park West makes a significant meaningful contribution to addressing the borough's identified housing mix needs. Of the 52 units proposed:

- 36 homes (69%) are 3-bedroom, 6-person units, each with private gardens or balconies, generous internal space standards, and direct access to communal and play space;
- The remaining 16 homes (31%) are generous 1-bedroom, 2-person units, meeting the needs of smaller households, downsizers, or young professionals.

6.28 This mix directly reflects the identified shortfall in family housing across the borough, while also providing a balanced range of typologies suitable for a range of household sizes. The Site's location, in a low-density, parkland environment outside of a town centre and with moderate PTAL, is ideally suited for larger homes. The inclusion of triplex maisonettes and lateral family apartments contributes to a diversity of typologies, helping to foster an inclusive residential community. On this basis, the proposed housing mix is considered fully consistent with the NPPF, the London Plan, and the Hillingdon Local Plan.

### **Affordable Housing**

6.29 Affordable housing delivery is a central objective of planning policy at all levels, aimed at addressing affordability pressures and supporting the creation of mixed, inclusive communities. National, regional and local planning frameworks all seek to maximise affordable provision on new developments, subject to viability and delivery constraints.

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6.30 At the national level, the National Planning Policy Framework (NPPF, 2024) requires that planning policies reflect the needs of different groups in the community, including those requiring affordable housing (Paragraph 63). Local plans are expected to set clear requirements for the type and tenure of affordable homes to be delivered, including the proportion of homes for Social Rent (Paragraph 64).

6.31 The London Plan (2021) sets out a strategic framework for affordable housing delivery across the capital. Policy H4 (Delivering Affordable Housing) confirms that affordable homes should be provided on-site as part of residential development unless exceptional circumstances apply. Policy H5 (Threshold Approach) identifies a minimum strategic threshold of 35 percent affordable housing on private land (rising to 50 percent on public or industrial land). Where schemes fall below the threshold, they must follow the viability-tested route, supported by a Financial Viability Assessment (FVA) and subject to Early and Late Stage Review mechanisms. Policy H6 (Affordable Housing Tenure) sets out the Mayor's preferred tenure split, typically seeking 30 percent low-cost rented housing (e.g. Social Rent or London Affordable Rent), 30 percent intermediate housing (e.g. shared ownership or London Living Rent), and 40 percent to be determined by the borough based on need.

6.32 At the local level, Policy H2 of the Hillingdon Local Plan: Part 1 (2012) sets a borough-wide strategic target of 35 percent affordable housing. Policy DMH 7 of the Local Plan: Part 2 (2020) expects all major residential developments to provide affordable housing on-site in accordance with identified need, unless robust viability evidence justifies a lower amount. Hillingdon supports the use of the threshold approach set out in the London Plan and applies the Mayor's preferred tenure mix. Affordable units must be tenure blind, well integrated into the development, and supported by equal access to amenity, open space, and high-quality design. Hillingdon set a preference for larger family units.

6.33 The proposed development proposes 15 percent affordable housing, comprising a mix of 70 percent Social Rent and 30 percent Shared Ownership. This tenure split aligns with the Mayor's policy expectation for low-cost rented homes to form the majority of affordable housing provision. The unit mix address Hillingdon's established need for larger affordable family units.

6.34 The proposed level of delivery has been determined through a detailed Financial Viability Assessment, submitted in support of the application, which demonstrates that 15 percent represents the maximum reasonable and viable level of provision in light of the Site's constraints.

6.35 The affordable homes are tenure blind in appearance, quality and access. They benefit from the same level of daylight, private and communal amenity space, cycle parking, and building entrances as the market units. The proposed affordable unit mix includes family-sized social rent homes,

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responding to the Council's most pressing housing need. In this context, the affordable housing provision complied with the objectives of the NPPF, the London Plan and the Hillingdon Local Plan, and delivers genuine social value on a constrained and underused Site.

## **Heritage**

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6.36 The consideration of heritage impacts was undertaken in accordance with the relevant national, regional and local planning policy framework, which together seek to ensure that development conserves and enhances the historic environment, including designated and non-designated heritage assets and their settings.

6.37 At national level, the National Planning Policy Framework (2024) sets out the Government's approach to conserving and enhancing the historic environment in Chapter 16. Paragraph 202 states that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Paragraph 207 requires applicants to describe the significance of any heritage assets affected. Paragraphs 212 to 221 establish the tests for assessing harm to designated assets, distinguishing between substantial and less than substantial harm and requiring public benefits to be weighed against any harm identified.

6.38 At regional level, the London Plan (2021) seeks to ensure that the capital's rich and diverse heritage is protected and celebrated. Policy HC1 (Heritage Conservation and Growth) requires development to identify, understand and conserve heritage assets and their settings, and to integrate them sensitively into new development. It also supports the adaptation and creative reuse of heritage buildings to secure their long-term sustainable future.

6.39 At local level, the Hillingdon Local Plan provides further guidance on managing the borough's historic environment. Policy DMHB 3 (Heritage Assets) requires development proposals affecting designated heritage assets to preserve or enhance their significance, including through appropriate scale, form, materials and detailing. Policy DMHB 4 (Listed Buildings) specifically requires proposals affecting a listed building or its setting to retain its architectural or historic character, to avoid harm to its significance, and to ensure that any alterations are sympathetic and reversible wherever possible.

6.40 The proposals have been developed through a heritage-led approach that draws upon the detailed analysis in the Heritage, Townscape and Visual Impact Assessment prepared by Iceni Projects. The assessment confirms that the Site currently makes a limited and negative contribution to the setting of the Grade II\* listed Hayes Park Central and Hayes Park South. The existing multi-storey car park is of poor architectural quality, utilitarian in appearance, and interrupts the otherwise coherent modernist composition and pastoral character of Hayes Park.

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6.41 The redevelopment of the Site provides a significant opportunity to repair and enhance this setting. The proposed building has been designed to respect the geometry, proportions and architectural language of Bunshaft's listed buildings while clearly expressing itself as a contemporary addition. The use of light concrete-toned materials, deep window reveals and rhythmic façade elements references the refined palette of the existing complex. The building sits within the footprint and general scale of the existing car park, rising to three and four storeys, and remains comfortably below the height of the mature tree canopy and the parapet line of Hayes Park Central.

6.42 Extensive landscape improvements will reintroduce soft planting and tree cover in place of hard surfacing, reinstating the visual continuity of the parkland setting. The podium courtyard and peripheral landscape zones have been designed to read as extensions of the surrounding grounds, using native species and gentle mounding to blend the new development into its context. These measures ensure that the proposed building will be read as part of the established family of structures within Hayes Park and that the spatial relationship between buildings and open landscape is preserved

6.43 The HTVIA concludes that the development will sustain and in parts enhance the significance of the listed buildings. It will replace an inactive, visually discordant element with a high-quality residential scheme that complements the architectural intent and setting of the heritage assets. The effect on the significance of Hayes Park Central and South is therefore assessed as beneficial. There will be no harm to the locally listed Dalton's Dairy Farmhouse and Outbuildings at Home Farm, which are separated from the Site by intervening vegetation and have a distinct agricultural context.

6.44 Accordingly, the proposals are fully consistent with Policy HE1 of the Hillingdon Local Plan Part 1, Policy DMHB 1 of the Local Plan Part 2, London Plan Policy HC1 and the relevant provisions of the NPPF. The scheme represents a sensitive and heritage-led form of development that secures the long-term enhancement of Hayes Park's historic environment while delivering high-quality new homes within a cohesive, landscaped setting.

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### **Design and Materiality**

6.45 Design quality is a central consideration within national, regional and local planning policy. Good design is not simply about appearance, but also about functionality, context, inclusivity and sustainability. Policies at all levels encourage schemes that respond positively to local character, deliver a high standard of architecture and materials, and reinforce a sense of place.

6.46 At the national level, the NPPF (2024) places significant weight on achieving well-designed places. Paragraph 131 states that well-designed, high-quality and beautiful environments are a central goal of the planning system. Paragraph 137 encourages early and proactive engagement with planning authorities and local communities to secure high-quality, contextual design outcomes.

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6.47 The London Plan (2021) sets out a strong design-led agenda for all new development. Policy D3 (Optimising Site Capacity Through the Design-Led Approach) requires that proposals respond to local context, character and form, while maximising site capacity in a way that supports liveability and sustainability. Policy D4 (Delivering Good Design) sets expectations for a rigorous and transparent design process, including early-stage design reviews and engagement with borough officers. Policy D5 promotes inclusive design principles, and Policy HC1 requires that development affecting heritage assets is sympathetic to their significance and setting, including in material choice and articulation.

6.48 At the local level, Policy DMHB 11 of the Hillingdon Local Plan: Part 2 requires that new development is of a high standard of design that harmonises with the local context, makes efficient use of land, and incorporates high-quality materials and detailing. Policy DMHB 12 expects proposals to protect and enhance the character of the surrounding area and to contribute positively to streetscape and setting. Where located near heritage assets, proposals must preserve or enhance their significance and setting.

6.49 The design of the proposed development has evolved through an extensive and collaborative pre-application process with the London Borough of Hillingdon, the GLA and Historic England. This process involved three formal pre-application meetings, alongside design and technical workshops, with each iteration responding directly to officer feedback. A key theme raised during this process was the need to ensure that the new building forms part of a coherent "family of buildings" within the Hayes Park estate, and that its form, articulation and materiality respect the architectural language of the adjacent Grade II\* listed Hayes Park Central and South buildings.

6.50 In response to officer and stakeholder feedback, the scheme adopts a carefully calibrated courtyard typology. This typology was selected to ensure a low and legible built form that reads as part of the wider Hayes Park estate, with generous separation between blocks to maintain key view corridors and break down the visual massing. The building is fixed at four storeys, which ensures it sits comfortably below the mature tree canopy and remains clearly subservient to the adjacent Grade II listed Hayes Park Central and South buildings. These proportions were tested extensively through fixed and dynamic visual modelling and refined to avoid any harm to openness or setting. The form is further sculpted through deep recesses and stepped upper storeys, which take cues from the confident geometry of the listed assets without direct replication. These moves lend rhythm and articulation to the façades and help visually anchor the building within the Site's wider landscape context.

6.51 The material strategy, developed in close coordination with Historic England and LB Hillingdon officers, has been central to ensuring the new building reads as a contemporary but contextually grounded addition to the Hayes Park estate. As illustrated in the DAS), the proposed palette consists of smooth and textured precast concrete panels, expressed banding and floor plates, and anodised

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aluminium detailing that reflect the architectural language of the estate while reinforcing the new building's own identity. The composition of materials responds directly to site-specific constraints, including the need for durability, visual subtlety and integration within a wooded, heritage-rich setting. Recessed window reveals and crisp horizontal detailing reinforce the building's calm, linear expression and recall the robust modernist architecture of Hayes Park South and Central, while the restrained tonal palette has been selected to complement the muted greys and bronzes of the surrounding buildings and the colours of the parkland environment. This strategy ensures that the building achieves a high level of design integrity and material richness, delivering a sense of refinement, cohesion and permanence.

6.52 The landscape approach has been developed from the outset as a fundamental component of the architectural response, supporting both placemaking and integration. The raised courtyard is planted with native, low-maintenance and drought-resistant species, creating a green heart that supports biodiversity, visual softness and microclimate benefits. The scheme replaces hardstanding with a rich mix of planting, trees, hedgerows and informal play features. The podium edge is softened with vertical planting and varied textures, helping to visually embed the building within the wider parkland context of the estate. Generous private balconies and gardens, in combination with shared communal amenity, provide high-quality outdoor space for all residents, while the courtyard layout supports passive surveillance, play and neighbourly interaction. These interventions combine to deliver a liveable, green and inclusive environment, aligned with London Plan and local policy objectives.

6.53 In summary, the design and materiality of the scheme reflect a mature and highly considered architectural response to the Site's unique opportunities and constraints. The proposals respond directly to the expectations of the NPPF, London Plan and Hillingdon Local Plan, as well as to the specific sensitivities of the Site's Green Belt location, adjacency to designated heritage assets, and prominent landscape setting. The design reflects the outcome of an iterative and collaborative process, shaped through sustained dialogue with officers and statutory consultees, and results in a building of clear architectural quality that is both respectful and distinctive. It achieves a balance between continuity and innovation, establishing a new residential presence within Hayes Park that complements and enhances the estate as a whole.

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

6.54 Planning policy at all levels prioritises high-quality residential design, with clear expectations around internal space standards, daylight, outlook, private amenity provision and access to communal facilities. National and regional policy encourages optimisation of land, but not at the expense of liveability, usability or long-term flexibility.

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6.55 At the national level, the NPPF (2024) states at Paragraph 63 that planning policies should reflect the needs of different groups in the community, including families with children, older people and those with disabilities. Paragraph 135 confirms that planning decisions should promote health and wellbeing by ensuring high-quality, safe and inclusive design, including access to open space.

6.56 The London Plan (2021) establishes a strong set of residential quality expectations. Policy D3 requires that internal and external environments be of the highest quality and designed for comfort, safety, usability and future adaptability. Policy D6 (Housing Quality and Standards) requires all homes to meet the Nationally Described Space Standards (NDSS) and to provide at least 5 square metres of private outdoor space per 1-bedroom home, with larger requirements for multi-bedroom dwellings. The policy also expects high levels of dual aspect, adequate floor-to-ceiling heights, and sufficient daylight and privacy. Policy D7 supports inclusive and accessible design, including step-free access and adaptable layouts across all tenures.

6.57 At the local level, Policy DMH 6 of the Hillingdon Local Plan: Part 2 requires that new homes meet or exceed minimum internal space standards and provide high-quality amenity space that is private, usable and appropriate to the scale and type of development. The policy supports the use of communal space and encourages the provision of family-sized homes with access to gardens, balconies or terraces. Adequate privacy, outlook and access to natural light are all key expectations.

6.58 The proposed development provides a total of 52 new homes, all of which meet or exceed the Nationally Described Space Standards and London Plan amenity benchmarks, please refer to SEW Schedule of Accommodation. The layout includes a diverse mix of typologies, including triplex maisonettes with ground-level gardens, lateral family flats and dual-aspect upper-floor apartments. The proposed development ensures clear, legible access with efficient cores, wide corridors, and an intuitive internal arrangement. Ceiling heights exceed 2.5m throughout, and a majority of units enjoy dual aspect. No homes are north-facing single aspect.

6.59 A detailed Daylight, Sunlight and Lighting (DLSL) Assessment confirms that the scheme performs exceptionally well in terms of internal daylight and sunlight levels. According to the report:

- All habitable rooms across the development meet or exceed the BRE recommended Average Daylight Factor (ADF) targets.
- All living/dining areas meet BRE criteria for daylight distribution.
- 100 percent of windows tested pass Vertical Sky Component (VSC) thresholds, with most comfortably exceeding the minimums.

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- Sunlight availability is excellent, with the vast majority of south and west facing rooms achieving full annual sunlight access compliance.

6.60 This high level of daylight performance reflects the Site's open setting, the generous separation between blocks, and the careful optimisation of unit orientation, window positioning and courtyard layout. It confirms that the homes will offer a bright and comfortable internal environment, aligned with the aims of the London Plan and Local Plan Policy DMH 6.

6.61 All residents benefit from generous private and shared amenity space, through gardens, balconies or terraces, supplemented by a high-quality shared courtyard. The courtyard is designed as a multifunctional, inclusive space that supports social interaction, play and passive use.

6.62 In accordance with London Plan Policy S4 (Play and Informal Recreation) and the Mayor's Play and Informal Recreation SPG (2012), developments are expected to provide a minimum of 10 square metres of dedicated play space per child. Based on the GLA's Child Yield Calculator, the proposed 52-unit scheme (comprising 16 one-bedroom and 36 three-bedroom homes) is expected to yield approximately 32.6 children. This results in a policy requirement of 325.7 square metres of play space on-site. The Hillingdon Local Plan Part 2 Policy DMCI5 similarly requires play provision at a rate of 10 sqm per child, with equipped or informal play areas located within 400 metres of residential units.

6.63 The proposed development provides:

- Doorstep play space: 161 sqm, fully integrated within the courtyard and garden spaces, meeting the London Plan and Local Plan requirement;
- Communal podium courtyard: 495 sqm of high-quality shared amenity space that includes informal play opportunities through natural features, planting, seating edges and open lawn areas;
- Private outdoor space (balconies, terraces and gardens): 1,112 sqm total, meeting or exceeding the London Plan minimum of 5 sqm for 1-bedroom dwellings, plus an additional 1 sqm for each additional occupant in larger homes.

6.64 The design of both private and shared amenity space has been developed to maximise usability, natural surveillance and visual connection to surrounding parkland. Family-sized homes at ground level benefit from dedicated private gardens with defensible thresholds. Upper-level balconies are generous with deep reveals, offering privacy and shading. The communal courtyard is directly accessible to all residents and benefits from passive surveillance, step-free access, generous

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planting and integrated seating. The soft landscape edges of the Site further enhance the sense of openness and connection to nature.

6.65 In summary, the proposed development provides a high standard of residential quality across all typologies and tenure types. It meets or exceeds all relevant internal space, daylight, aspect and amenity requirements, while delivering a carefully integrated and inclusive public realm. The proposed development aligns with the aims of the NPPF, London Plan and Hillingdon Local Plan.

### **Landscaping and Biodiversity**

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6.66 The approach to landscape and biodiversity at Hayes Park West has been developed in response to national, regional and local planning policy, all of which place strong emphasis on the protection and enhancement of the natural environment and the integration of green infrastructure within new development.

6.67 NPPF paragraph 187 (d) requires plans and decisions to protect and enhance the natural environment and to secure net gains for biodiversity. Chapter 15 sets the expectations to minimise impacts and provide net gains for biodiversity (para 187d), to take a strategic approach to ecological networks (para 188), and to identify and pursue opportunities for securing measurable net gains (para 192b). For decision making it sets clear principles on avoiding, mitigating and compensating harm, safeguarding Sites of Special Scientific Importance and protecting irreplaceable habitats (para 193), and confirms that the presumption does not apply where a habitats site could be affected unless an appropriate assessment shows no adverse effect on integrity (para 195). The importance of trees and incorporating them into new development is reinforced in the design chapter (para 136).

6.68 At the regional level, the London Plan (2021) sets out a robust policy framework for biodiversity, green infrastructure and urban greening. Policy G1 (Green Infrastructure) seeks to protect, enhance and expand London's green infrastructure network, while Policy G5 (Urban Greening) requires major development proposals to incorporate high-quality landscaping and achieve an Urban Greening Factor (UGF) target score of 0.4 for residential schemes. Policy G6 (Biodiversity and Access to Nature) reinforces the expectation that development should manage impacts on biodiversity and deliver measurable net gains, contributing to London's ecological resilience and network of habitats. In addition, Policy SI13 (Sustainable Drainage) promotes the use of natural landscape-based drainage solutions to improve water management, support biodiversity and reduce flood risk.

6.69 At the local level, the Hillingdon Local Plan: Part 1 (2012) and Part 2 (2020) include complementary policies that seek to conserve and enhance the borough's landscape and ecological value. Policy EM7 of Part 1 encourages development that protects and strengthens biodiversity, while Policy EM1 promotes green infrastructure as a means of addressing climate change and enhancing local amenity. The detailed development management policies in Part 2, particularly DMHB 14 (Trees and

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Landscaping) and DMEI 7 (Biodiversity Protection and Enhancement), require that proposals retain and enhance existing landscape features, provide high-quality new planting, and demonstrate measurable biodiversity gains. Policy DMEI 1 further encourages the use of living roofs and walls where feasible, and Policy DMCI 4 supports the provision of open space within new major developments to serve residents and the wider community.

6.70 The proposed development places landscape and biodiversity enhancement at the heart of the design approach. The current car park is dominated by hardstanding and offers negligible ecological value. The proposed development will transform the Site into a green and ecologically active environment through the introduction of a layered landscape structure that integrates with the wider Hayes Park estate. The strategy, set out in the Design and Access Statement and supporting Ecology and Biodiversity Report (Greengage), prioritises the creation of high-quality open space and native planting that complements the parkland character of the setting while delivering significant ecological uplift.

6.71 The proposed development achieves a Biodiversity Net Gain of 19.28% for area-based habitats and 24.92% for hedgerows, exceeding the statutory 10% requirement and demonstrating clear compliance with both local and London Plan policy. Enhancements include new wildflower meadows, native tree and shrub planting, species-rich grassland and ornamental planting designed to attract pollinators. The courtyard and podium gardens are designed to promote habitat diversity and seasonal variation, while rain gardens and swales provide sustainable urban drainage and support amphibian and invertebrate habitats. Bird and bat boxes will be integrated into the building fabric and landscape features to further strengthen biodiversity connections. The proposed development would also achieve a policy compliant Urban Greening Factor of 0.49.

6.72 The landscape masterplan reinforces the “family of buildings” concept established across the estate by maintaining the pastoral character and visual openness of Hayes Park. The planting palette references the wider parkland landscape, introducing a mix of native species, structured hedgerows and semi-mature trees that will mature to frame views and soften the built form. The podium courtyard forms the green heart of the scheme, providing both visual amenity and functional space for residents, while the peripheral planting enhances ecological corridors and strengthens the transition between the new building and the surrounding open parkland.

6.73 In summary, the proposed landscaping and biodiversity strategy has been guided by a clear hierarchy of policy at national, regional and local level and demonstrably exceeds minimum requirements. The development will deliver a significant environmental enhancement through the transformation of an underutilised, hard-surfaced site into a well-integrated green landscape that contributes positively to the ecological, visual and social quality of the wider Hayes Park estate.

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## Flood Risk

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6.74 The approach to flood risk and drainage at Hayes Park West has been developed in accordance with the relevant national, regional and local policy hierarchy, all of which promote the reduction of flood risk and the sustainable management of surface and foul water through integrated design.

6.75 At national level, the National Planning Policy Framework (2024) establishes that development should be directed away from areas at highest risk of flooding and should not increase flood risk elsewhere. Paragraph 181 requires local planning authorities to ensure that development is appropriately flood resilient and resistant, while paragraph 185 encourages the use of natural flood management techniques. Paragraph 182 also requires developments to manage surface water sustainably, with priority given to sustainable drainage systems that deliver multiple benefits including water quality, biodiversity and amenity.

6.76 At regional level, the London Plan requires flood risk to be managed in a sustainable and cost-effective way through collaboration with the Environment Agency, Lead Local Flood Authorities and developers. Policy SI12 (Flood Risk Management) seeks to minimise and mitigate flood risk, including through making space for water and using natural flood management methods. Policy SI13 (Sustainable Drainage) requires development to utilise SuDS in line with the drainage hierarchy, ensuring runoff is managed as close to its source as possible and that surface water is controlled at greenfield rates.

6.77 At local level, the Hillingdon Local Plan builds on these principles. Policy EM6 of Part 1 directs development away from areas at risk of flooding and promotes the use of SuDS. Policies DMEI 9 (Management of Flood Risk) and DMEI 10 (Water Management, Efficiency and Quality) in Part 2 require major developments to demonstrate that flood risk will be effectively mitigated, that SuDS have been incorporated, and that surface water runoff will be reduced to greenfield rates with appropriate allowance for climate change. These policies also promote the use of green infrastructure to improve water quality and environmental resilience.

6.78 A detailed Drainage Strategy Report prepared by Whitby Wood confirms that the Site lies within Flood Zone 1, meaning it has a low probability of flooding from rivers or the sea. The proposed development will therefore not be at risk from fluvial or tidal flooding. There is a medium surface-water (pluvial) flood risk on parts of the Site, with modelled ponding typically up to around 0.9 m and small areas exceeding this under climate-change scenarios

6.79 The proposed drainage strategy incorporates a series of sustainable drainage features designed to attenuate and treat surface water runoff at source before discharge from the Site. Runoff will be managed through a combination of intensive green roofs, permeable block paving, tree pits, rain gardens and a below-ground geocellular attenuation tank. Discharge will be restricted to a maximum

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flow rate of 6.8 litres per second, which reflects the Site's calculated QBar (greenfield runoff rate). The system has been modelled using Causeway Flow+ and shown to accommodate rainfall events up to and including the 1 in 100-year event plus a 40% climate change allowance without any on-site flooding.

- 6.80 The SuDS features have been designed to provide multiple co-benefits, including flood mitigation, biodiversity gain and water quality improvements, while contributing to the overall landscape and amenity strategy. Maintenance of the drainage infrastructure will be secured through the wider estate management regime and delivered in line with best practice, as set out in the CIRIA SuDS Manual (C753). A schedule of typical maintenance tasks is included in the Drainage Strategy to support long-term performance and resilience.
- 6.81 The proposed development will therefore deliver a comprehensive and sustainable drainage solution that significantly enhances the Site's current condition. It will ensure runoff is effectively controlled, prevent any increase in flood risk on or off Site, and support the delivery of wider environmental benefits through the integration of blue-green infrastructure, ecological enhancement and improved water management.

## **Transport and Highways**

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- 6.82 The transport and highways impacts of the proposed development have been assessed against the relevant national, regional and local policy framework, all of which encourage a sustainable approach to access and movement.
- 6.83 At national level, the National Planning Policy Framework (2024) requires development to prioritise walking, cycling and public transport, and to promote efficient and low-impact travel. Paragraph 109 seeks to ensure that development gives priority to pedestrian and cycle movements, followed by access to high quality public transport, and that it provides safe, secure and convenient layouts that allow for the efficient delivery of goods and access by service and emergency vehicles. Paragraph 116 confirms that development should only be refused on highway grounds if there would be an unacceptable impact on highway safety or if residual cumulative impacts on the network would be severe.
- 6.84 At regional level, the London Plan seeks to promote active and sustainable travel, reduce reliance on private vehicles and improve road safety. Policy T1 establishes the Mayor's strategic objective that 80% of all trips in London should be made by walking, cycling or public transport by 2041. Policy T4 requires developments to assess and mitigate transport impacts and deliver appropriate infrastructure. Policies T5 and T6 set standards for cycle and car parking respectively, promoting high-quality and secure cycle provision and limiting car parking to encourage modal shift. Policy T7

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encourages efficient delivery, servicing and construction management, minimising the impact of freight on the highway network.

6.85 At local level, the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) support the same principles. Strategic Objective SO12 seeks to reduce reliance on the car by improving walking and cycling routes and promoting travel plans. Policy T1 promotes accessibility by sustainable modes, while Policies DMT1, DMT2 and DMT6 require development to demonstrate safe and efficient access, mitigate impacts on the network and provide parking in accordance with local standards.

6.86 The Transport Statement prepared by Iceni Projects confirms that the Site is accessible by a range of sustainable transport modes, with local bus stops within approximately one kilometre and frequent services providing access to Hayes and Harlington station in around 30 minutes. The Public Transport Accessibility Level (PTAL) of 0 is an underestimation due to the private estate roads, and a score of 2 is considered more representative. Pedestrian routes, cycle connections and existing footways along Park Lane and Hayes End Road provide safe and convenient access to surrounding areas.

6.87 The development will deliver 52 new homes with 52 on-site parking spaces, including 7 active electric vehicle (EV) charging bays, 5 disabled spaces, and passive provision for the remainder, consistent with the London Plan Policy T6.1 maximum standards for low PTAL outer London sites (which allow up to 1–1.5 spaces per 1–2-bedroom dwelling and up to 2 spaces per 3+ bedroom dwelling). The Hillingdon Local Plan Policy DMT6 applies the same upper limit, seeking 1–1.5 spaces for smaller units and 2 spaces for larger homes. The proposed ratio of 1 space per dwelling (100%) is therefore within both London Plan and Local Plan maximum standards, providing appropriate provision given the Site's Green Belt location and limited public transport accessibility (PTAL 0–2).

6.88 In terms of cycle parking, London Plan Policy T5 and Hillingdon Local Plan Policy DMT5 require a minimum of 2 spaces per 3+ bedroom dwelling and 1.5 spaces per 1–2-bedroom dwelling, which together equates to a policy requirement of 88 long-stay spaces for this development ( $16 \times 1.5 + 36 \times 2 = 88$ ). The scheme provides 97 long-stay cycle parking spaces plus 10 short-stay visitor spaces, comfortably exceeding policy requirements.

6.89 Trip generation modelling based on TRICS data indicates that the scheme will result in 16 two-way vehicle trips in the morning peak hour and 13 in the evening peak hour, equating to roughly one movement every four minutes. This level of activity is negligible in the context of the local highway network and does not represent a material change in traffic conditions.

6.90 Servicing and refuse collection will take place within the Site, as confirmed in the Delivery and Servicing Plan. A dedicated loading bay is provided at the northern end of the access road, with turning heads at the southeast and southwest corners enabling large vehicles to manoeuvre and exit

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in forward gear. Swept path analysis demonstrates that refuse, emergency and service vehicles can operate safely without affecting surrounding routes.

- 6.91 During construction, vehicle routing and management will follow the Outline Construction Logistics Plan prepared by Iceni Projects, which identifies strategic access via the A40, A437, A4020 and A312 to minimise impacts on local roads. Deliveries will be scheduled outside peak hours, and all contractors will be required to use approved routes and sustainable travel options for site personnel.
- 6.92 Overall, the proposed development comply with the full hierarchy of transport policy and provide a sustainable, safe and efficient approach to movement. The residual traffic effects are minimal, and servicing, parking and access have been carefully designed to meet policy requirements while promoting active and low-carbon modes of travel.

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### **Fire Safety**

- 6.93 The proposals have been designed in accordance with the London Plan Policies D12 (Fire Safety) and D5 (Inclusive Design), BS 9991:2024, and the Building Regulations 2010 (as amended).
- 6.94 All dwellings have direct external access, with no internal communal corridors or shared cores, substantially reducing the risk of smoke spread and simplifying evacuation. The development comprises a mix of single-storey apartments and three- to four-storey dwellinghouses, each served by a protected internal stair leading directly to a final exit. Travel distances within ancillary areas comply with BS 9991 (Table 16) and are within the typical 45–50 metre target for means of escape. From the most distant points within the dwellinghouses, residents would travel approximately 35–45 metres to reach a protected stair and then discharge directly outside.
- 6.95 A simultaneous evacuation strategy applies to ancillary areas, while within individual dwellings occupants are expected to self-evacuate if affected. The building design therefore operates a “stay-put” principle between units, consistent with low-rise, self-contained dwellings, but simultaneous evacuation within each dwelling and ancillary zone.
- 6.96 No evacuation lift is proposed, as all homes have ground-level or direct external access and no internal communal vertical circulation requiring a lift for evacuation.
- 6.97 Firefighting access is provided via the internal estate road network, meeting the London Fire Brigade requirements for access, turning and load capacity. Fire appliances can reach within 75–90 metres of all dwellings, well within the 45–50 metre target hose-laying distances for low-rise buildings.

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6.98 Each dwelling includes an automatic sprinkler system (BS 9251:2021) and a Category LD1 smoke/heat alarm system (BS 5839-6:2020). The car park incorporates mechanical smoke and heat ventilation, and all structural elements achieve minimum 60-minute fire resistance.

6.99 Taken together, these measures ensure that the development provides safe, inclusive and code-compliant evacuation arrangements and robust firefighting access in accordance with the London Plan and Building Regulations.

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### **Sustainability and Energy**

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6.100 The proposed development has been developed with a strong commitment to sustainable design, in accordance with the requirements of national, regional and local policy. The scheme has been assessed against the NPPF (2024), the London Plan (2021), and the Hillingdon Local Plan, each of which requires major developments to minimise carbon emissions, maximise energy efficiency, reduce resource consumption and deliver long-term environmental resilience.

6.101 At national level, the NPPF emphasises that planning should support the transition to a low carbon future in a changing climate, including by shaping places that reduce greenhouse gas emissions and minimise vulnerability to climate impacts (paragraphs 163 and 164). Development should be planned to promote energy efficiency and renewable energy generation.

6.102 At regional level, the London Plan sets out an ambitious framework for achieving net zero carbon development. Policy SI2 requires major developments to follow the “Be Lean, Be Clean, Be Green, Be Seen” hierarchy, reducing energy demand through fabric-first design, supplying energy efficiently, maximising the use of renewable technologies, and monitoring performance. Policy SI7 promotes circular economy principles and the reuse and recycling of materials, while Policy SI5 requires efficient use of water and integration of sustainable drainage.

6.103 At local level, Policies DMEI 2 and EM1 of the Hillingdon Local Plan require all major developments to minimise carbon dioxide emissions in accordance with London Plan targets and demonstrate how energy savings will be achieved. Policy DMEI 10 promotes water efficiency, while Policy DMEI 7 requires enhancement of biodiversity and integration of green infrastructure to support climate resilience.

6.104 The Sustainability Strategy prepared by Hoare Lea confirms that the proposed development achieves high sustainability performance across all relevant categories, framed around the five capitals model: physical, social, economic, human and natural value. The design has been informed by extensive engagement with the Council and the GLA, and will deliver measurable long-term benefits in terms of carbon reduction, resource efficiency, climate resilience, health and wellbeing, and biodiversity enhancement.

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6.105 The Energy Strategy demonstrates that the proposed development will be highly energy-efficient, achieving compliance with Building Regulations Part L 2021 and following a clear fabric-first approach to minimise energy demand. The design includes improved fabric performance, air source heat pumps for heating and hot water, and mechanical ventilation with heat recovery. These measures result in a substantial reduction in operational energy use and carbon emissions compared to the Building Regulations baseline.

6.106 The accompanying Whole Life Carbon Assessment confirms that the development performs better than the GLA baseline benchmark for upfront carbon, with a value of 766 kgCO<sub>2</sub>e/m<sup>2</sup> against a target of 850 kgCO<sub>2</sub>e/m<sup>2</sup>, and achieves a total whole life carbon intensity of 1,621 kgCO<sub>2</sub>e/m<sup>2</sup> including sequestration. The design also incorporates partial retention of the existing car park substructure, reuse of pad foundations and the use of concrete with 20% GGBS cement replacement, collectively reducing embodied carbon and construction waste. Further opportunities have been identified to lower emissions through increased GGBS content, recycled reinforcement and optimisation of the steel frame.

6.107 The proposed development also embed circular economy principles through reuse and recycling of materials, selection of products with high recycled content, and a commitment to achieve at least 95% diversion of construction waste from landfill. Operational waste management will facilitate separation and recycling in line with the GLA target of a minimum 65% recycling rate by 2030.

6.108 Water efficiency has been designed in accordance with Policy SI5, with a target of less than 105 litres per person per day, achieved through efficient fittings and appliances and provision for rainwater harvesting. The integration of green roofs, permeable surfaces and rain gardens contributes further to the scheme's environmental performance, supporting sustainable drainage, biodiversity, and thermal regulation.

6.109 Overall, the proposed development will deliver reductions in operational and embodied carbon, meet and exceed the requirements of London Plan Policy SI2, and achieve compliance with the Council's sustainability objectives. Through the combination of energy efficiency, low-carbon technologies, circular economy design and green infrastructure, the proposed development will contribute positively to Hillingdon's transition towards net zero carbon.

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### **Noise and Air Quality**

6.110 The assessment of noise and air quality impacts will be undertaken in accordance with the relevant national, regional and local planning policy framework, all of which seek to ensure that development is compatible with its surroundings and does not result in unacceptable impacts on the health or amenity of future or existing occupants.

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6.111 At national level, the National Planning Policy Framework (2024) establishes that planning decisions should ensure that new development is appropriate for its location, taking into account the effects of pollution and the sensitivity of the area and proposed uses. Paragraph 187 requires that planning decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants and take account of the presence of Air Quality Management Areas (AQMAs).

6.112 At regional level, the London Plan (2021) contains detailed policy requirements for managing environmental quality. Policy SI1 (Improving Air Quality) requires development to minimise exposure to existing poor air quality and reduce emissions during both construction and operation, supporting the Mayor's target of achieving World Health Organization guideline levels. Major development proposals must be at least air quality neutral, and air quality positive where possible. Policy D14 (Noise) seeks to manage noise and ensure that development avoids significant adverse impacts, mitigates and minimises potential effects, and creates good acoustic design through layout, orientation and internal specification.

6.113 At local level, the Hillingdon Local Plan includes complementary policies. Policy EM8 (Land, Water, Air and Noise) requires development to ensure that pollution is controlled and that the quality of the environment and amenity of residents is protected. It seeks to ensure that noise-sensitive uses are located away from existing sources of significant noise, and that noise-generating uses include appropriate mitigation. Policy DMEI 14 (Air Quality) requires development to minimise emissions and exposure to poor air quality, particularly within or adjacent to designated Air Quality Management Areas. The supporting text to these policies reinforces the Council's aim to improve local air quality and safeguard the health of residents and future occupiers.

6.114 The Noise Impact Assessment confirms that the Site is suitable for residential development. Baseline noise monitoring was carried out in June 2023 and reflects a context of low background noise levels, with dominant sources being distant road traffic and occasional aircraft movements. The assessment concludes that acceptable internal noise levels can be achieved throughout the scheme through the use of standard double glazing and appropriate ventilation, with no requirement for enhanced mitigation. Compliance with Approved Document O has also been demonstrated, with the majority of rooms capable of being naturally ventilated while maintaining internal noise limits. External amenity areas, including private gardens and communal spaces, are also expected to meet or fall below the 50 dB LAeq,T threshold set out in BS8233, ensuring a high standard of acoustic comfort. Plant noise limits have been recommended and can be secured by condition to safeguard future residents and neighbouring occupiers.

6.115 The Air Quality Assessment confirms that the Site is located within an Air Quality Management Area (AQMA) designated by the London Borough of Hillingdon due to exceedances of the annual mean nitrogen dioxide (NO<sub>2</sub>) objective. However, monitoring and dispersion modelling undertaken for the

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proposed development show that existing background pollutant levels at the Site are well below the relevant air quality objectives. Predicted concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> at all proposed receptor locations are within national limits. The assessment concludes that the development will not introduce any new exposure to unacceptable air quality, and that its operation—being car-free and free of combustion-based heating—will not result in any material degradation of local air quality. Construction phase impacts are also expected to be negligible and can be effectively managed through a standard Construction Environmental Management Plan (CEMP).

- 6.116 In summary, the submitted reports confirm that the proposed development will not expose future occupants to unacceptable levels of noise or air pollution, nor will it result in harm to the amenity of neighbouring properties. The scheme is therefore fully compliant with the relevant provisions of the NPPF, London Plan and Hillingdon Local Plan in respect of noise and air quality.

#### **Ground Contamination and Pollution**

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- 6.117 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 DEMI12 of the Local Plan Part Two.
- 6.118 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 proposed development is compliant with relevant policies.

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## 7. SUSTAINABLE DEVELOPMENT AND SCHEME BENEFITS

- 7.1 The National Planning Policy Framework (2024) defines the purpose of planning as contributing to the achievement of sustainable development. Paragraphs 7-9 identify three interdependent objectives, economic, social and environmental, which must be pursued in mutually supportive ways. This section demonstrates how the proposed development at Hayes Park West delivers clear benefits across each of these dimensions, achieving the overarching aims of the NPPF and the strategic objectives of the London Plan and Hillingdon Local Plan.
- 7.2 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.

### **Economic Benefits**

- 7.3 The redevelopment will bring a longtime-vacant and underused part of the Hayes Park estate back into productive use, contributing to the local economy both during construction and in operation. The proposed development will generate economic benefits both during construction and in the long term. During the construction phase, the scheme will support a range of direct and indirect employment opportunities for contractors, suppliers and professional consultants, contributing to local economic activity over an estimated two-year build period. The Applicant is committed to engaging local labour and training initiatives where possible, creating opportunities for apprenticeships and on-site skills development in partnership with local colleges and training providers.
- 7.4 Once completed, the scheme will continue to generate employment through estate management, maintenance, cleaning, landscaping and other associated building services. Residents will also contribute to the local economy by increasing local spending in nearby shops and services, supporting growth in Hayes and the wider Hillingdon area.
- 7.5 The proposed development will also deliver 52 new homes on previously developed land, contributing directly to meeting the borough's identified housing need at a time of significant shortfall. This includes 15% affordable housing (9 homes), secured through a Section 106 Agreement, representing the maximum reasonable level in viability terms. The provision of genuinely affordable homes at Social Rent and Shared Ownership levels is a clear economic and social benefit in itself.
- 7.6 The proposed development will also generate significant Community Infrastructure Levy (CIL) payments and other planning obligations, supporting local investment in infrastructure, public realm and community facilities. Together, these measures deliver long-term economic value through sustainable growth and efficient land use consistent with the Mayor's Good Growth objectives.

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## **Social Benefits**

7.7 The proposed development will deliver a social benefit through the creation of a balanced and inclusive residential community within the Hayes Park estate, on disused, previously developed land. Of the 52 new homes proposed, 36 (69%) are family-sized dwellings, directly responding to Hillingdon's acute shortage of larger homes. The proposed development also provides a range of high-quality, tenure-blind affordable housing, supporting mixed communities and social inclusion.

7.8 All homes meet or exceed Nationally Described Space Standards and benefit from excellent daylight and sunlight performance. The layout prioritises legibility, accessibility and inclusivity, with all homes benefiting from private outdoor space and access to extensive shared amenity areas.

7.9 The central courtyard provides a safe, green communal space incorporating doorstep play, planting and social seating, while ground-floor units have private gardens that promote neighbourly interaction and passive surveillance. The development will deliver high-quality, inclusive play provision as part of its landscaped courtyard and garden spaces. Around 161 square metres of dedicated doorstep play will be provided, meeting the London Plan and Hillingdon standards and offering safe, natural, and accessible opportunities for young children to play and interact within a well-overlooked communal environment.

7.10 The proposed development will also enhance wellbeing through the creation of high-quality landscaped environments that encourage outdoor activity, play and social connection. Secure cycle parking and pedestrian-friendly routes promote sustainable travel and active lifestyles.

7.11 Securing the delivery of the listed building consents for Hayes Park Central and Hayes Park South represents a significant public benefit. These Grade II\* listed buildings are of national architectural and historic importance, and their long-term conservation and reuse is a key objective of both the local planning authority and Historic England. Through the Section 106 Agreement, the Applicant will commit to bringing forward the approved conversion and restoration works, ensuring that these heritage assets are safeguarded and sensitively integrated into the wider estate.

7.12 The Applicant has also committed to exploring opportunities for managed public access to the Site, including to selected areas of communal space and the wider landscaped setting, for example in partnership with Open House or a comparable cultural organisation. This initiative would enable the public to experience and appreciate the architectural and historic significance of the Grade II\* listed Hayes Park buildings and their parkland setting, adding a cultural and educational dimension to the scheme's public benefits.

## **7.13 Environmental Benefits**

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7.14 The proposed development delivers environmental gains by transforming a hard-surfaced, visually intrusive car park into a green, biodiverse and energy-efficient development. The landscape and biodiversity strategy provides a measurable Biodiversity Net Gain of 19.28% for area habitats and 24.92% for hedgerows, exceeding the statutory 10% target. A host of green infrastructure will be introduced to the Site including native planting, rain gardens, green roofs and sustainable drainage features will support wildlife, improve water quality, and enhance the ecological resilience of the wider estate. The Proposed Development would achieve an Urban Greening Factor of 0.49.

7.15 The retained basement structure and reuse of existing foundations minimise embodied carbon, while new construction will incorporate low-carbon materials including concrete with 20% GGBS replacement and recycled steel reinforcement. The Energy Strategy confirms that the proposed development follows a fabric-first approach, using air source heat pumps, mechanical ventilation with heat recovery and rooftop photovoltaic panels to achieve a 57% on-site reduction in regulated carbon emissions beyond Building Regulations Part L 2021.

7.16 Sustainable design measures extend to water and waste management, with efficient fittings achieving consumption below 105 litres per person per day and operational waste systems supporting a minimum 65% recycling rate. The combination of green roofs, permeable paving and below-ground attenuation provides robust flood resilience, achieving greenfield runoff rates and improving local water management.

7.17 The proposed development therefore delivers a comprehensive package of sustainability and environmental enhancements, aligning with the NPPF's environmental objectives and meeting or exceeding the requirements of London Plan Policies SI2, SI5, SI7 and SI13, and Hillingdon Local Plan Policies EM1, DMEI2 and DMEI10.

### **Summary**

7.18 Taken as a whole, the proposed development represents sustainable, design-led regeneration. It makes efficient use of previously developed land, enhances the setting of nationally important listed buildings, and delivers high-quality new homes that meet local needs while promoting environmental stewardship and community wellbeing.

7.19 The proposed development fully accords with the economic, social and environmental dimensions of sustainable development set out in the NPPF and will deliver long-term public benefits that significantly outweigh any limited impacts associated with redevelopment.

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## 8. PLANNING BALANCE AND CONCLUSION

8.1 The proposed development represents the final phase in the coordinated regeneration of Hayes Park, delivering 52 high quality new homes in place of a disused multi-storey car park. The proposed development continues the design-led transformation of the estate, building on the principles established through earlier approvals and responding sensitively to the setting of the listed buildings and surrounding landscape.

8.2 The Planning Statement has outlined that the proposed development would bring a large, long-term vacant car park, with no scope for future use, back into active use as new homes. The proposed development would provide 52 homes including 1-bed and 3-bed homes while delivering 15% affordable housing on a previously developed site in the Green Belt.

8.3 Paragraph 154(g) of the NPPF establishes that the redevelopment of previously developed land in the Green Belt is not inappropriate where the proposal does not result in a significant impact on openness of the Green Belt. As demonstrated in Chapter 6, the proposed development significantly improve the overall visual integration of the Site with its setting and does not harm the spatial openness of the Green Belt. The building adopts a courtyard typology with generous separation between volumes, and is embedded in a new landscape that reinforces the parkland setting of the estate. The *HTVIA* concludes that the scheme's landscape and public realm proposals will reinforce the spatial openness of the Green Belt and improve visual permeability within Hayes Park, ensuring that areas for play and recreation contribute positively to both the social function of the development and the preservation of its open character in line with paragraph 154(g) of the NPPF. The proposed development is therefore not inappropriate development and are acceptable in principle.

8.4 The Proposed Development would provide significant positive economic, social and environmental, as demonstrated throughout this Planning Statement and summarised in Section 7. In particular:

- **Economic:** The proposed development would secure the long-term active use of a large vacant car park buildings for new homes. The Site currently contributes little to the wider community and these proposals would optimise the use of the land in accordance with the Mayor's 'Good Growth Agenda'.
- **Social:** The proposed development would contribute towards the creation of a new residential community at Hayes Park, complementing the approved homes at Hayes Park North and Hayes Park Central and South. 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 and helping to meet the ever-increasing need for family housing in the Borough.

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- **Environmental:** The proposed development 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 proposed development.

8.5 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*

*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<sup>7</sup> provides a strong reason for refusing the development proposed; or*

*ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination<sup>9</sup>.*

*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.*

8.6 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 proposed development from coming forward.

8.7 Therefore, the proposed development 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 06/07/01; 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 at appeal – 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