

14 October 2026

Michael Briginshaw
Planning Services
London Borough of Hillingdon

Dear Michael,

**RE: HAYES PARK SOUTH AND CENTRAL, HAYES END ROAD, HAYES
DISCHARGE OF PRE-COMMENCEMENT CONDITIONS 5 AND 17
CLARIFICATION OF RAINWATER DRAINAGE ARRANGEMENTS, RAINWATER HARVESTING AND
SURFACE WATER MANAGEMENT**

Further to your recent correspondence regarding the discharge of Conditions 5 and 17, we have reviewed the comments received from the Conservation Officer and Lead Local Flood Authority (LLFA), and have undertaken further consultation with the appointed drainage engineer, Ammro Consulting.

We wish to provide the following clarification regarding the existing rainwater drainage arrangements, the consideration of rainwater harvesting measures and the proposed long-term management of the surface water drainage system.

1. EXISTING RAINWATER DRAINAGE ARRANGEMENTS – CONDITION 5

Hayes Park South and Central are Grade II* listed buildings, and the proposed refurbishment has been designed to minimise intervention into the existing historic fabric and preserve the architectural character of both buildings.

The proposed drainage strategy is based on retaining and reusing the existing rainwater drainage infrastructure wherever practicable.

The submitted Drainage Strategy Report (WW-XX-XX-RP-C-0002), Section 3.3, identifies rainwater pipework passing internally through the buildings before connecting to the below-ground drainage network.

The architectural demolition information similarly identifies that existing rainwater pipes and connections are to be retained and reused wherever possible, subject to survey and inspection.

It is not the intention of the proposed refurbishment works to introduce new visible external rainwater downpipes to the listed elevations.

The proposals therefore seek to utilise the established drainage arrangements, avoiding unnecessary external pipework, additional fixings or interventions into the historic building fabric.

We trust this clarification addresses the concerns raised regarding the potential visual impact of external rainwater goods and their effect on the architectural character of the listed buildings.



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2. RAINWATER HARVESTING AND WATER BUTTS – CONDITION 17

The submitted Drainage Strategy Report identifies that rainwater harvesting measures, including the potential provision of water butts, would be considered as part of the development.

Following further review of the architectural arrangements, existing drainage infrastructure and heritage constraints, it has been determined that the installation of water butts would not be appropriate for Hayes Park South and Central.

Both buildings are Grade II* listed, and the available locations for water butts would predominantly be within the proposed private residential terrace areas immediately adjacent to the buildings.

The introduction of water butts into these areas would result in additional visible modern equipment within the immediate setting of the listed buildings, potentially detracting from their architectural character and appearance.

Furthermore, the existing rainwater drainage arrangements incorporate internal rainwater pipework. Connecting external water butts could therefore necessitate additional pipework or alterations to the existing drainage infrastructure and historic building fabric.

The appointed drainage engineer, Ammro Consulting, has confirmed that water butts were not included within the surface water runoff calculations and that their omission will not affect the calculated surface water runoff rate.

Water butts were considered as a potential rainwater reuse and recycling measure rather than a necessary component of the surface water runoff calculations.

Having considered their suitability, the potential heritage impact and the practical constraints associated with their installation, it is proposed that water butts are omitted from the development.

We consider that this approach represents an appropriate balance between sustainable drainage objectives and the preservation of the special architectural and historic interest of the Grade II* listed buildings.

We respectfully request that the LLFA accepts this justification for the omission of water butts.



3. SURFACE WATER DRAINAGE MANAGEMENT AND MAINTENANCE – CONDITION 17

A drainage management and maintenance strategy has previously been prepared by Ammro Consulting and submitted as part of the drainage information.

The proposed surface water drainage infrastructure will be subject to an ongoing inspection and maintenance regime to ensure its continued effective operation throughout the lifetime of the development.

Responsibility for implementing the management and maintenance arrangements will rest with the building management company or other responsible management organisation appointed by the building owner.

The identity of the responsible management organisation is currently being confirmed with the client.

The existing drainage management and maintenance strategy will remain applicable to the proposed drainage arrangements, with the necessary inspection and maintenance requirements to be implemented by the responsible management organisation.

4. HERITAGE CONSIDERATIONS

The proposed approach to rainwater drainage and surface water management has been informed by the Grade II* listed status of Hayes Park South and Central.

The principal objectives are to:

- Retain and reuse existing rainwater drainage infrastructure wherever practicable.
- Avoid introducing unnecessary external drainage equipment.
- Minimise alterations and penetrations to the historic building fabric.
- Preserve the architectural appearance and setting of the listed buildings.
- Maintain an effective and appropriately managed surface water drainage system.

We consider that this approach responds positively to the concerns raised by the Conservation Officer while maintaining the functional requirements of the drainage strategy.

5. CONCLUSION

We trust the above clarification demonstrates that the proposed drainage arrangements have been carefully considered in relation to both the technical requirements of surface water management and the heritage significance of Hayes Park South and Central.

The proposed refurbishment seeks to retain and reuse the existing rainwater drainage infrastructure wherever practicable, without introducing unnecessary visible external pipework or associated equipment.



The omission of water butts is considered appropriate given the heritage and practical constraints of the site. The appointed drainage engineer has confirmed that their omission will not affect the calculated surface water runoff rate.

The existing drainage management and maintenance strategy provides the basis for the ongoing management of the surface water drainage infrastructure, with responsibility to be assigned to the building management organisation appointed by the client.

The organisation is London Flood Prevention Ltd, Unit 5 Marston Business Park, Lower Hazeldines, Marston Moretaine, Bedford, Bedfordshire MK43 0XT. Tel 020 8819 7710. Web www.londonfloorprevention.co.uk

We respectfully request that the Conservation Officer and LLFA reconsider the submitted drainage information in conjunction with the above clarification, with a view to supporting the discharge of Conditions 5 and 17.

We would be grateful for your assistance in progressing these matters and avoiding unnecessary delays to the development.

Yours sincerely,

Liz Atkinson

For and on behalf of

JDW Architects Ltd



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