DARAPLANNING.COM

1 & 2 Longwalk

Stockley Park

Planning Statement

PREPARED FOR

Royal UK Property Holdings LLP

OCTOBER 2026 / D056

00 Contents and issue details

01 Introduction 3
02 Description of the site 8
03 Stockley Park 10
04 Planning history 14
05 Pre-application engagement 17
06 The proposals 20
07 Consideration of alternatives 29
08 Planning policy context 35
09 Planning assessment 39
10 Draft heads of terms 75
11 Conclusion 79
A Relevant planning policies 83

DOCUMENT CONTROL

Project	D056 / 1 & 2 Longwalk
Document	Planning Statement
Prepared for	Royal UK Property Holdings LLP
Status	Planning application
Date	October 2026

01

Introduction

01 Introduction

1.1 This Planning Statement has been prepared by DARA Planning on behalf of our client, Royal UK Property Holdings LLP (the 'Applicant'), in support of a full planning application at 1 Longwalk Road, Hayes, Uxbridge UB11 1DB, and 2 Longwalk Road, Hayes, Uxbridge UB11 1BA (the 'Site').

1.2 The purpose of this Statement is to introduce the site and the development proposals, to outline the relevant planning policy and other material considerations, and to draw conclusions so that planning permission may be granted.

1.3 The proposed development at 1 and 2 Longwalk (the "Proposals") is described as follows:

> *"Full planning permission for the demolition of the existing buildings; redevelopment of the site to provide two commercial units for flexible industrial, storage and distribution uses (Use Classes B2/B8/E(g)(iii)), with ancillary office space, yard areas, servicing, vehicular and cycle parking; hard and soft landscaping and associated works."*

1.4 The Proposals have been the subject of an extensive pre-application process with the London Borough of Hillingdon, comprising two formal pre-application meetings (ref. 79646/PRC/2025/143), and design meetings with Historic England in April, July and August 2026. The scheme now before the Council has been materially revised in response to that engagement.

1.5 A suite of technical information has been submitted in support of this planning application which is noted below for ease:

Document	Author
Cover letter	DARA Planning
Application form and ownership certificates	DARA Planning
CIL additional information form	DARA Planning

Document	Author
Planning Statement	DARA Planning
Site location plan	UMC Architects
Site plans	UMC Architects
Existing plans, elevations and sections	UMC Architects
Proposed plans, elevations and sections	UMC Architects
Design and Access Statement	UMC Architects
Landscape Design and Access Statement	Exterior Architecture
Landscape drawings	Exterior Architecture
Statement of Community Involvement	Dev Coms
Whole Life Cycle Carbon Assessment	SRE
Circular Economy Statement	SRE
Prediction of Performance and Operational Energy Use (TM54)	SRE
Demolition and Construction Method Statement	SRE
Arboricultural Implications Assessment	CBA Trees
Preliminary Geo-Environmental Risk Assessment	Evolve Geo Environmental
Air Quality Assessment	Trium
Ecological Impact Assessment	MKA

Document	Author
Biodiversity Net Gain Appraisal	Trium
Biodiversity Net Gain Metric	Trium
Socio Economic Benefits Statement	Trium
Noise Impact Assessment	Trium
Office Marketing Report	Bray Fox Smith
Industrial and Logistics Market Overview	Montagu Evans
Office Use Viability Assessment	Montagu Evans
Built Heritage, Townscape and Visual Impact Assessment	Montagu Evans
Flood Risk Assessment and SuDs Statement	HWA
Healthy Street Transport Assessment	Mode Transport
Deliveries and Servicing Plan	Mode Transport
Framework Travel Plan	Mode Transport
Framework Car Parking Management Plan	Mode Transport
Outline Construction Logistics Plans	Mode Transport
Energy and Overheating Assessment	Chord
Utilities Search	Chord
External Lighting Assessment	Chord

Document	Author
Glint and Glare Assessment	Pager
Aerodrome Safeguarding Assessment	Pager
Fire Statement	Orion

1.6 This Planning Statement reviews the planning context for the issues associated with the development against the National Planning Policy Framework (NPPF), the London Borough of Hillingdon Local Plan, the London Plan and is structured as follows:

- **Section 2** provides a description of the Site and local context
- **Section 3** provides an overview of Stockley Park
- **Section 4** provides an overview of the Site's planning history
- **Section 5** provides an overview of the pre-application engagement
- **Section 6** provides an overview of the application proposals
- **Section 7** considers the development alternatives
- **Section 8** sets out the planning policy context for the scheme
- **Section 9** considers the key planning issues associated with the development
- **Section 10** provides the draft section 106 heads of terms; and
- **Section 11** sets out our summary and conclusions.

02

Description of the site

02 Description of the site

The Application Site

2.1 The site comprises the adjoining office plots at 1 Longwalk Road, Hayes, Uxbridge UB11 1DB, and 2 Longwalk Road, Hayes, Uxbridge UB11 1BA. It extends to approximately 2.53 hectares within the established Stockley Park business park. The existing buildings, surface parking, internal access and associated landscaped areas form part of an integrated employment and landscape setting.

2.2 The plots are experienced within a wider composition of pavilion buildings, planted boundaries, water features, roads and pedestrian spaces. The relationship between development and landscape is central to the layout of the park.

Site Designations

2.3 The Site is subject to the following designations under the London Borough of Hillingdon Local Plan Part 2 – Policies Map January 2020 (adoption version):

- Office Growth Location;
- Locally Significant Employment Location; and
- Air Quality Management Area

2.4 The Site is not located within a Conservation Area and contains no listed buildings. The Site is within Flood Zone 1 and located within the wider Stockley Park business park (Phase 1) which forms part of a designated Grade II Registered Park and Garden. Stockley Park Lakes and Meadows is a Nature Conservation Site of Borough Grade II (local) importance. There are six locally listed buildings within the Park: 1, 3, 5 and 7 Roundwood Avenue, 5 Longwalk Road and The Arena.

03
Stockley Park

03 Stockley Park

Stockley Park

3.1 Stockley Park, in the London Borough of Hillingdon, was developed between 1986 and 1998 as one of the UK's pioneering business parks. Designed by Arup Associates with landscape design by Ede Griffiths Partnership, it transformed former landfill land into a high-quality business environment, complemented by a golf course and country park.

3.2 The Park's design combined modular office buildings with landmark architecture by Norman Foster, Ian Ritchie, and later Eric Parry. It is now Grade II Registered (2020) for its innovative masterplanning, integration of landscape and architecture, and role in business park development.

3.3 Stockley Park promotes wellbeing and community through amenities such as a golf course, gym, food and drink outlets, and seasonal events. It has historically attracted major occupiers across technology, pharmaceutical, retail, and logistics sectors, including Apple, Marks & Spencer, Gilead Sciences, Sharp, and Regus.

3.4 Despite its heritage and quality, Stockley Park faces significant challenges. By the end of July 2025, the vacancy rate was estimated at 49%, far above the borough average of 16.8% (CoStar). With further lease expiries approaching in 2026 – 8 and occupiers consolidating floorspace, vacancy levels are likely to rise.

3.5 Sustained high vacancy reduces footfall, undermines the viability of on-site amenities, and threatens the Park's ability to fund the upkeep of its 88-acre grounds. Without strategic intervention and diversification, Stockley Park risks entering a cycle of decline that could ultimately render it financially unsustainable. This shift has already become apparent through recent engagement with Stockley Park Management who have identified the challenges around securing funding to maintain the essential facilities of the Park.

Current Office Market Context

3.6 The office market has shifted significantly since COVID-19. Occupiers increasingly prioritise high-quality buildings in central, amenity-rich locations with excellent public

transport links. This “flight to quality” has left older, car-oriented business parks struggling to compete.

3.7 Demand is strongest for modern, 5-star offices, while older stock has seen substantial negative absorption. Proximity to airports is now less relevant due to reduced business travel and the rise of hybrid working. Sustainability has become a critical factor, with tighter EPC standards reducing the attractiveness of lower-rated buildings. Minimum Energy Efficiency Standards (MEES) regulations came into effect on 1 April 2023, mandating that commercial properties have an EPC rating of at least Grade E to be let lawfully. The regulations are also targeting a minimum of EPC B by 2031. Buildings with poor EPC ratings are undesirable to potential occupants. This poses a significant risk to the buildings at Stockley Park which are of an older stock and therefore are at risk of failing to achieve the minimum EPC requirement. The issues which the freeholder faces at Stockley Park is that the capital expenditure required to bring the existing buildings up to an EPC B (to meet the 2031 requirement) far exceeds the rental income that can be achieved, given the shift in office demand profile. There have been examples, such as 2 The Square, on the Park where freeholders have taken a risk with speculative refurbishments in an attempt to attract new tenants. Unfortunately, this has not been successful, and some of the newly refurbished buildings have laid vacant for up to 4 years.

3.8 LB Hillingdon’s vacancy rate (16.8% in Dec 2023) is well above the market balance (5–10%), with older buildings performing worse still. Stockley Park is disadvantaged by its low-density, car-focused layout, limited amenities, and the high cost of upgrading stock to meet modern standards. Diversification will be essential.

3.9 By the end of July 2025, the vacancy rate at Stockley Park was estimated at 49 per cent, against a borough average of 16.8 per cent (CoStar). With further lease expiries approaching and occupiers consolidating floorspace, vacancy levels are likely to rise.

The Emerging Stockley Park Vision

3.10 Discussions between the Stockley Park Board, Stockley Park Estates Company Ltd (SPECL), and the Council have been ongoing since October 2023 to establish a new vision for the Park to help address the overwhelming vacancy rates that the Park is facing as a result in the shift is office demand. The aim of this process is to re-imagine Stockley Park’s future by introducing alternative land uses and increasing flexibility within planning designations and the Local Plan to support a wider range of activities. This process has included pre-application discussions with the planning, design and regeneration teams at senior level, along with engagement with stakeholders and Historic England.

3.11 These discussions have led to the preparation of the draft Stockley Park Desing Code which sets out design principles and parameters to guide future development and maintain consistency across the Park's fragmented freehold ownership. In addition, Stockley Park are also progressing towards the submission of evidence as part of the emerging Regulation 18 Local Plan review which is expected to take place in Q3/Q4 2026.

3.12 The proposals have been prepared in line with the current draft Design Code to ensure consistency with this process.

04
Planning history

04 Planning history

4.1 The site has a limited planning history. The most relevant entries are:

- Refurbishment works to include a new main and rear entrances and facades works which were approved in 2008 (ref. 37103/APP/2008/2720); and .
- Refurbishment works to the existing building, including extensions to form new front entrance and façade in October 2022 (ref. 37103/APP/2022/3110).

4.2 Phase 1 of Stockley Park was granted outline planning permission in 1984 for 140,000m2 of mixed use floorspace, including plans for a Science and Commercial Park (ref. 27951/B/81/1955). The description of development states:

> *"Reclamation of land and comprehensive development as:*
>
> *Golf course and club house, district park, amenity, sporting and recreational facilities*
>
> *Science and commercial park comprising multi-purpose general and light industrial buildings related to high technology operations including laboratories and training facilities and uses falling within sub-paragraphs (a) and (b) of Section 66(2) of the Town and Country Planning Act 1971 with ancillary offices and/or warehouse buildings with ancillary offices, bank, clinic and daycare centre, restaurant and public house, shops, lake and amenity, sporting and recreational facilities at land east and west of Stockley Road, West Drayton, Hayes (outline application)."*

4.3 It is important to note here that the original permission identifies Stockley Park as a science and commercial park comprising multi-purpose general and light industrial buildings. It specifically notes uses falling within sub-paragraphs (a) and (b) of Section 66(2) of the Town and Country Planning Act 1971 with ancillary offices and/or warehouse buildings with ancillary offices, along with other supporting uses.

4.4 Section 66(2) of the Town and Country Planning Act 1971 is extracted below for ease, it states (our underlining):

> ***Meaning of "industrial building"***
>
> *(1)In this Part of this Act " industrial building" means a building used or designed for use—*
>
> *(a)for the carrying on of any process for or incidental to any of the following purposes, that is to say—*

(i)the making of any article or of part of any article; or

(ii)the altering, repairing, ornamenting, finishing, cleaning, washing, freezing, packing or canning, or adapting for sale, or breaking up or demolition, of any article; or

(iii)without prejudice to the preceding sub-paragraphs, the getting, dressing or preparation for sale of minerals or the extraction or preparation for sale of oil or brine ;

(b)for the carrying on of scientific research,

being a process or research carried on in the course of a trade or business.

(2)For the purposes of subsection (1) of this section, premises which—

(a)are used or designed for use for providing services or facilities ancillary to the use of other premises for the carrying on of any such process or research as is mentioned in that subsection; and

(b)are or are to be comprised in the same building or the same curtilage as those other premises,

shall themselves be treated as used or designed for use for the carrying on of such a process or, as the case may be, of such research.

4.5 It is therefore clear that the original Stockley Park permission allowed the use of industrial and warehouse buildings on the estate. This was very much the original intent and must have been considered acceptable by the London Borough of Hillingdon at the time.

4.6 Phase 2 of Stockley Park, was granted planning permission in 1990 for 38,500m2 floorspace on land allocated for industrial employment purposes – again including as assumed industrial B2 (ref. 37500/B/89/0396):

> *"Redevelopment for industrial and/or office and/or research and development and/or training together with other uses ancillary to these uses, excluding industrial development within Classes B3-B7 of the Town and Country Planning (Use Classes) Order 1987. Construction of new access and provision of private and public open space (outline application)."*

4.7 In line with the Phase 1 permission, the latter Phase 2 consent allowed for the redevelopment of the site for industrial uses on the Site.

05
Pre-application engagement

05 Pre-application engagement

5.1 The Applicant has sought to engage positively with the London Borough of Hillingdon, Historic England and other stakeholders within Stockley Park on the proposals.

Pre-application Engagement

5.2 A pre-application enquiry was submitted to the London Borough of Hillingdon on 7 October 2025, followed by a meeting on 26 November 2025. The London Borough of Hillingdon issued written pre-application advice on 3 February 2026 (ref. 79646/PRC/2025/143), raising objections on the principle of development, heritage and character, amenity, noise and highways. The proposals were subsequently developed further to address the London Borough of Hillingdon's comments. In addition, the design team requested a pre-application meeting with Historic England which took place in April 2026 to discuss the architectural response to the Registered Park and Garden. The feedback from the meeting was positive and allowed further design amendments to take place to reduce the visual appearance of the proposals and to help direct the landscape proposals. The revised scheme was subsequently submitted to the London Borough of Hillingdon and Historic England on 27 July 2026, incorporating substantial reductions in height, footprint and site coverage and a significantly enhanced landscape strategy. A joint meeting was then held with the London Borough of Hillingdon and Historic England on the 29 July 2026 and 05 August 2026. Feedback from that meeting helped inform further changes to the scheme. At the point of writing this statement, written feedback is still awaited from this meeting with the London Borough of Hillingdon.

Community Engagement

5.3 The Statement of Community Involvement records engagement with political representatives and the local business community, letters to 58 business addresses on 12 August 2026 and an exhibition at 2 Longwalk on 26 August 2026. These activities provided an opportunity to explain the proposals and identify any concerns from neighbouring occupiers.

5.4 A meeting also took place with the Board of Directors at Stockley Park on the 11 August 2026. The feedback from the meeting was positive and supportive given the

Boards position on the need for change and alignment of the proposals with the Emerging Stockley Park vision.

Environmental Impact Assessment

5.5 A screening request was issued by Trium Environmental to the London Borough of Hillingdon on 19 December 2025. The London Borough of Hillingdon issued their response on the 20 July 2026 noting that the proposed development on its own and in combination with other projects, is unlikely to result in significant environmental effects arising from either its construction, or operation, taking account of appropriate mitigation and conventional and proportionate planning controls. The characteristics and significance of the potential impacts of the proposed development would result in localised rather than significant environmental impacts. The London Borough of Hillingdon have confirmed that the development does not constitute EIA development requiring an Environmental Statement.

06

The proposals

06 The proposals

6.1 The Proposals comprise the demolition of the two existing vacant office buildings and the erection of two commercial units, being Unit 100 and Unit 200, for flexible industrial, storage and distribution use within Use Classes B2, B8 and E(g)(iii), together with ancillary office accommodation, yard and servicing areas, car and cycle parking, landscaping and associated infrastructure.

6.2 The formal description of the development is as follows:

> *"Full planning permission for the demolition of the existing buildings; redevelopment of the site to provide two commercial units for flexible industrial, storage and distribution uses (Use Classes B2/B8/E(g)(iii)), with ancillary office space, yard areas, servicing, vehicular and cycle parking; hard and soft landscaping and associated works."*

6.3 The submitted Design and Access Statement has been prepared by UMC Architects to explain the design principles and concepts applied to the development and the steps taken to appraise its context.

Land use and Areas

6.4 A comparison of the existing and proposed land uses and corresponding building areas is provided in the table below:

Building	GEA (sqm)	GIA (sqm)
Existing 1 Longwalk	7,690	7,410
Existing 2 Longwalk	5,400	4,857
Existing Amenity Building	100	80
Existing Total	13,190	12,347

Building	GEA (sqm)	GIA (sqm)
Proposed Unit 100	6,208	6052
Proposed Unit 200	5,094	4,954
Proposed Amenity Building	100	80
Total Proposed	11,402	11,086

Architecture

6.5 The Proposals comprise the redevelopment of the existing office plots to provide two employment buildings accommodating flexible industrial, storage and distribution uses, with ancillary offices, parking, servicing and landscaping.

6.6 The architectural approach has evolved through engagement with the London Borough of Hillingdon and Historic England. Its central objective is to accommodate modern employment uses within a composition that responds to the distinctive pavilion buildings and integrated landscape of Stockley Park's Grade II Registered Park and Garden.

6.7 The development retains a two-building arrangement, separated by the central access road and landscaping. This maintains the distinction between the plots and allows the buildings to be experienced as separate elements within the landscape. Offices and principal entrances address the public-facing elevations, with servicing concentrated towards the rear.

6.8 The elevations draw on the original Arup pavilion architecture through a regular panel grid, horizontal bands of glazing, white and off-white cladding, recessed darker panels and expressed cross-bracing details. Variations in panel depth provide shadow and relief, helping to articulate the larger elevations. The cross-bracing is an architectural reference rather than an exposed structural system.

6.9 The roof design has also been refined. Earlier lantern features have been removed and the pitched roof forms are more visibly expressed above the façades. Clear internal height has reduced from 15 metres to 12.5 metres.

6.10 Rooflights and photovoltaic panels are incorporated into the roof design. The smaller existing amenity building north of Unit 100 is retained, preserving an element of the original pavilion composition.

Landscape

6.11 A Landscape Statement prepared by Exterior Architecture sets out the landscape strategy and its relationship with the architectural proposals. The approach responds to Stockley Park's significance as a Grade II Registered Park and Garden, where the arrangement of buildings, structural planting, circulation routes and amenity spaces forms an integrated composition.

6.12 The proposals have evolved in response to comments from the London Borough of Hillingdon and Historic England, with greater emphasis on retaining the established landscape structure and limiting unnecessary intervention. Reduced building footprints and rear yard depths allow more existing landscaping to be retained. The scheme retains the lime-tree necklace and boundary planting, including western hedgerows, and incorporates a planted central avenue to reinforce the landscape setting and separation of the two buildings.

6.13 Retained and supplementary hedging around parking areas and western service yards provides a formal landscape framework, helping to contain views of vehicles, servicing activity and operational equipment. This responds to concerns about the introduction of a harder industrial character and draws on the hedged enclosures and structural planting characteristic of the original park. Proposed planting has also been simplified, with some additional trees omitted where their proximity could overcrowd or compromise retained vegetation.

6.14 The north-eastern social space is retained as an established component of the landscape composition. Targeted enhancements include planting, seating and the repair or replacement of deteriorated pond-edge and surfacing materials. The intention is to conserve the space's character through proportionate intervention, retaining existing boulders and using materials sympathetic to the park's established palette.

6.15 The northern ancillary building is retained within a habitat-focused landscape area, preserving an element of the original pavilion composition as a shower block and its surrounding setting. Together, these measures seek to maintain the relationship between buildings, planted spaces and circulation routes that contributes to the significance of the Registered Park and Garden.

6.16 The existing site has approximately 5,800 sqm of soft landscaping compared with approximately 6,200 sqm of retained and proposed soft landscaping, as part of the proposals. The proposals include 63 proposed new trees and the removal of 26 Category C trees and 14 young Prunus trees.

Biodiversity Net Gain

6.17 The submitted biodiversity appraisal and metric identify approximately 6.54 baseline habitat units and 0.557 hedgerow units. The assessed on-site proposals provide

approximately 5.62 habitat units and 1.30 hedgerow units, representing a 14.12% habitat-unit loss and a 133.08% hedgerow-unit gain. The identified requirement to achieve the mandatory 10% gain is approximately 1.58 additional habitat units, including provision addressing the individual-tree trading requirement. The Applicant will secure suitable off-site provision, including opportunities within Stockley Park where feasible, with statutory biodiversity credits considered only as a last resort. The delivery route will be confirmed through the Biodiversity Gain Plan and the associated registration, allocation and long-term management arrangements.

6.18 It should be noted that the full 10% BNG uplift could have been incorporated within the site but it was agreed with the London Borough of Hillingdon that the Council's preference would be to limit the amount of intervention into the existing landscape given the Registered Park and Garden status. Instead, it was requested that any shortfall in BNG should be provided off-site within Stockley Park or by way of a payment. Off-site provision elsewhere within Stockley Park is being explored to address the deficit.

Transport

6.19 The transport proposals are supported by a Healthy Streets Transport Assessment, Framework Travel Plan, Car Parking Management Plan, Delivery and Servicing Plan and Outline Construction Logistics Plan prepared by Mode Transport Planning. Together, these documents address access, movement, parking and servicing during construction and operation.

6.20 Pedestrian access would be provided from the existing footways on Longwalk Road, with an internal pedestrian network connecting the entrances of Units 100 and 200, parking areas and cycle facilities. The arrangements seek to provide convenient access to both buildings while managing potential conflicts with vehicular movements.

6.21 Vehicular and cycle access would remain from Longwalk Road, retaining the two existing access points. The northern access would connect to the central internal road, serving the rear service yards and parking associated with Unit 100. The southern access would provide direct access to the parking serving Unit 200.

6.22 A total of 88 car parking spaces would be provided, comprising 47 spaces for Unit 100 and 41 for Unit 200. This represents a substantial reduction from the approximately 380 existing spaces. The provision includes six accessible bays, 26 electric vehicle charging points—including charging provision for all six accessible bays and five car-sharing spaces. These allocations form part of the overall parking total. The Car Parking Management Plan sets out arrangements for allocation, monitoring and the prevention of overspill or inappropriate parking.

6.23 The proposals provide 68 cycle parking spaces, comprising 54 long-stay and 14 short-stay spaces. This includes retention of the existing 40-space facility serving Unit 100, together with a new 14-space long-stay facility serving Unit 200 and 14 visitor spaces across the two plots. The Healthy Streets Transport Assessment confirms that this provision exceeds its assessed B2/B8 minimum and meets the long-stay requirement for the proposed E(g)(iii) use. The facilities would be supported by showers, changing provision and lockers, with accessible cycle provision and detailed arrangements secured through the coordinated final design.

6.24 Dedicated service yards would be provided to the rear of both buildings, separating loading and unloading from the principal employee and visitor parking areas. The servicing strategy accommodates vehicles up to 16.5-metre articulated HGVs, supported by swept-path analysis of access and manoeuvring arrangements. Delivery and servicing vehicles would approach via the A408 Stockley Road, Bennetsfield Road and Longwalk Road. The site's proximity to the principal estate entrance limits the need for vehicles to travel through the wider park.

6.25 The Delivery and Servicing Plan provides a framework for managing vehicle routing, delivery scheduling, waiting and loading activity. These measures respond to officer concerns regarding HGV movements, inappropriate waiting and potential effects on estate roads, verges and the landscaped setting. Final arrangements would require coordination with the future occupiers and Stockley Park estate management.

6.26 The Outline Construction Logistics Plan sets out the proposed construction access, routing and delivery management strategy. Construction is anticipated to take approximately 12 - 17 months. Vehicle types would include light goods vehicles, rigid HGVs and articulated HGVs, with larger vehicles principally associated with material deliveries and waste removal.

6.27 Construction logistics measures include advance delivery booking, managed arrival and unloading arrangements, wheel washing where necessary, monitoring of road cleanliness and condition, and liaison with estate management and neighbouring occupiers. A detailed Construction Logistics Plan would be prepared following appointment of the principal contractor to reflect the confirmed programme, methodology and vehicle requirements. This requirement is anticipated to be conditioned.

Energy and Sustainability

6.28 The Proposal is supported by an Energy and Overheating Assessment, a TM54 operational energy assessment and a Whole Life-Cycle Carbon Assessment. Together, these documents consider energy demand, carbon emissions, thermal comfort and the environmental effects of construction and operation.

6.29 The proposed strategy follows a fabric-first approach, using improved insulation, airtightness and glazing performance to limit heating and cooling demand. Efficient building services, ventilation controls and LED lighting would further reduce energy consumption.

6.30 An all-electric servicing strategy is proposed, incorporating air source heat pumps and roof-mounted photovoltaic panels. The roof plans identify 118 photovoltaic panels on Unit 100 and 113 on Unit 200, subject to final specialist coordination. These measures would reduce reliance on fossil-fuel combustion at the buildings and provide on-site renewable electricity generation.

6.31 The overheating assessment considers thermal comfort and measures to manage solar gains and internal temperatures. The strategy includes passive measures and ventilation alongside efficient mechanical systems.

6.32 The TM54 assessment estimates operational energy consumption under defined warehouse and office assumptions, while the Whole Life-Cycle Carbon Assessment considers embodied and operational emissions over the buildings' study period. The Proposals seek to achieve BREEAM Excellent.

Environmental Considerations

6.33 The application is supported by technical assessments addressing ecology, noise, air quality, lighting, ground conditions, flood risk and drainage. These inform the design and identify measures to manage construction and operational effects.

Ecology

6.34 The ecological evidence includes a Preliminary Ecological Appraisal and Preliminary Roost Assessment prepared by MKA Ecology, which inform the Biodiversity Net Gain Appraisal prepared by Trium Environmental Consulting LLP. The assessments establish the habitat baseline and inform the retention and enhancement strategy. Trium's appraisal identifies no irreplaceable habitats within the site.

6.35 The proposals retain elements of the existing tree and hedgerow structure and introduce supplementary planting and a habitat-focused northern landscape area. These measures provide opportunities to maintain habitat connectivity and enhance retained spaces.

Noise and Vibration

6.36 A Noise and Vibration Impact Assessment prepared by Trium Environmental Consulting considers operational vehicle movements, loading and unloading, reversing alarms, industrial noise breakout and future building services plant. The assessment concludes that the proposed industrial and logistics uses are not

expected to give rise to significant adverse noise or vibration effects and considers the site suitable for the proposed uses from an acoustic perspective.

6.37 At the nearby Travelodge hotel, the assessment predicts a low operational noise impact during both daytime and night-time periods. Predicted internal noise levels at neighbouring commercial premises are also considered suitable for office activities. The assessment of individual night-time noise events indicates a low likelihood of sleep disturbance under the modelled conditions.

6.38 Trium identifies cumulative noise limits for future building services plant and recommends good operational management. Construction noise and vibration would be managed through appropriate working methods and a Demolition Method Statement. These findings support the acoustic acceptability of the development.

Air Quality

6.39 An Air Quality Assessment prepared by Trium Environmental Consulting concludes that the development would have a negligible impact on nitrogen dioxide and particulate concentrations. Overall operational air quality effects are assessed as not significant.

6.40 The proposed all-electric heating, cooling and hot-water strategy would avoid combustion emissions from those building services. During demolition and construction, dust and vehicle emissions would be managed through the mitigation and site-management measures identified in the assessment. With these measures implemented, the construction effects would also be negligible and not significant. These findings support the development's acceptability in air quality terms.

Land contamination

6.41 A Preliminary Geo-Environmental Risk Assessment prepared by Evolve Geo-Environmental considers the site's historical uses, ground conditions and potential contamination risks. The assessment recognises that large-scale remediation was undertaken to create the development platform occupied by the existing office buildings and assesses the potential for significant and widespread soil contamination as low to moderate.

6.42 The proposed buildings and hardstanding would limit opportunities for direct contact with underlying soils. The report identifies established measures to manage potential residual contamination, including suitable clean-cover soils within landscaped areas, an unexpected-contamination protocol, dust suppression and appropriate construction working practices.

6.43 Groundwater and ground-gas risks are assessed as moderate. Further ground investigation, groundwater sampling and gas monitoring would establish the detailed

conditions and inform any necessary remediation, gas protection and foundation design. A pre-demolition asbestos survey is also recommended.

6.44 The assessment therefore provides a basis for progressing the redevelopment through a defined programme of investigation and risk management. Subject to the findings of that work and implementation of the necessary protective measures, land contamination is considered capable of being addressed through the detailed design and construction process.

Flood Risk and Drainage

6.45 A Flood Risk Assessment and SuDS Statement prepared by Howard Ward Associates Ltd identifies the site within Flood Zone 1, with a very low probability of flooding from rivers or the sea. The assessment also considers other flood sources, including surface water and groundwater, and incorporates drainage and level-design measures to manage the identified risks.

6.46 The proposed strategy includes four attenuation tanks, controlled surface-water discharge totalling approximately 7.3 litres per second, permeable paving and treatment of service-yard runoff. The drainage design considers the 1-in-100-year rainfall event with a 40% climate-change allowance. Proposed levels and exceedance routes are intended to keep floodwater outside the buildings and manage flows without adversely affecting neighbouring properties.

External Lighting

6.47 An External Lighting Report prepared by Chord Consult establishes a strategy using energy-efficient LED fittings, controlled light distribution and automatic controls. The design seeks to illuminate access routes, parking and operational areas while limiting unnecessary light spill towards neighbouring properties, landscaped areas and the night sky.

6.48 Biodiversity amenity spaces are intended to remain unlit, with spill from adjoining areas minimised. Time-clock and photocell controls would prevent unnecessary operation, with provision to switch off lighting between 23:00 and 07:00 except where required for safety and security. This provides a positive framework for managing lighting effects, with the final specification to coordinate operational requirements, ecological recommendations and the sensitivity of the Registered Park and Garden.

07
Consideration of alternatives

07 Consideration of alternatives

Purpose of the assessment

7.1 The principal questions are whether an office or other employment use supported by the designation remains realistically deliverable, whether refurbishment can meet occupier requirements at a viable cost, and whether the replacement development achieves its objectives with proportionate heritage and environmental effects. These questions require financial, physical and market evidence considered together.

Option 1: Continued office use without substantial intervention

7.2 The first alternative is to retain the existing buildings and continue seeking office occupiers without substantial investment. Although this would avoid the immediate physical effects of redevelopment, it must be assessed against the buildings' condition, historic vacancy, the occupational market and the continuing financial liabilities associated with ownership.

7.3 Montagu Evans' Office Use Viability Assessment records that 1 Longwalk has been vacant since November 2020 and marketed unsuccessfully by Bray Fox Smith since January 2021. It has therefore remained vacant for almost six years. The assessment records that 2 Longwalk became vacant in November 2024. Both buildings are stripped out and require significant investment to provide competitive office accommodation.

7.4 Bray Fox Smith's agency report demonstrates that the difficulty is not confined to these properties. It identifies approximately 733,946 sq ft of available offices across Stockley Park, representing approximately 49% vacancy at the report date. Average annual take-up between 2021 and 2025 was approximately 74,759 sq ft, below the reported ten-year average of approximately 90,000 sq ft. The report also identifies reduced demand for large headquarters buildings and a strong preference for Grade A accommodation.

7.5 The marketing of 1 Longwalk has tested both its existing condition and the prospect of refurbishment. Bray Fox Smith records that the building was offered in its stripped-out condition and on the basis of a proposed full refurbishment. Its marketing included commercial property platforms, direct circulation to agents and prospective occupiers, and promotion through the Stockley Park website. The report records no leasehold

interest in taking the building either as existing or following full refurbishment. Freehold enquiries were received, but did not result in occupation.

7.6 This provides substantial direct evidence that continued marketing alone has not secured a viable occupational outcome for 1 Longwalk.

7.7 Continued vacancy also entails recurring expenditure without occupational income. The applicant remains responsible for applicable estate and service-charge contributions, which support the management and maintenance of the wider park, including its registered landscape. Retention without intervention is therefore an active financial burden rather than a neutral holding position.

7.8 The applicant advises that other owners of substantial vacant offices have raised concerns about estate-charge affordability and sought reductions in expenditure. Sustained vacancy creates a risk that pressure to reduce contributions, or difficulties in collecting them, could weaken the resources available for landscape maintenance. The relevant concern is the potential deterioration of the condition and significance of the Registered Park and Garden if its maintenance funding becomes unsustainable.

7.9 The “do nothing” scenario would consequently retain the existing buildings without addressing their occupational shortcomings or providing a demonstrated route to renewed employment activity. For 1 Longwalk in particular, almost six years of vacancy provides little confidence that an acceptable outcome will emerge simply through further waiting.

Option 2: Refurbishment for continued office use

7.10 The second alternative is comprehensive refurbishment to a specification capable of competing for office occupiers. This can take the form of a single office tenant fit out or a multi-tenant fit out. This has been tested by Montagu Evans through its viability assessment, supported by construction cost advice from Pulse Consult and occupational evidence from Bray Fox Smith.

7.11 Refurbishment has been investigated beyond an initial feasibility exercise. The assessment records that 1 Longwalk benefits from permission for office refurbishment, including entrance and façade alterations, and that the proposed works were competitively tendered. A construction contract was not entered into because of viability concerns. The current assessment uses the lowest tender return, updated by Pulse Consult, together with cost advice for comparable refurbishment of 2 Longwalk.

7.12 Bray Fox Smith explains that a light refurbishment would appeal to only a small part of the occupational market. Its evidence identifies a sustained preference for Grade A accommodation, accounting for more than 80% of recent Thames Valley take-up.

Montagu Evans therefore tests a comprehensive Grade A refurbishment intended to improve the buildings' ability to compete for that demand.

7.13 The updated construction costs are approximately £20 million for 1 Longwalk and £12.53 million for 2 Longwalk: approximately £32.53 million in total before contingency and professional fees. The appraisal also incorporates finance, marketing and letting costs, rent-free incentives and approximately £7.32 million of void costs comprising empty rates and service charges. These are substantial additional liabilities incurred while the buildings are being refurbished and let.

7.14 The appraisal adopts an annual office rent of £42.50 per sq ft, a 9% investment yield, 18-month rent-free periods and a 36-month letting period. Montagu Evans notes that the adopted rent exceeds the £39.50 per sq ft prime headline rent cited for Stockley Park. It also records Bray Fox Smith's view that the letting assumptions are highly optimistic given the park's vacancy and the unsuccessful marketing of 1 Longwalk.

7.15 Despite those assumptions, the appraisal generates a negative residual land value of approximately £17.06 million. Against the £9.9 million benchmark land value, the reported shortfall is approximately £26.96 million. The negative residual demonstrates that, under the tested assumptions, the refurbishment cannot support a positive land value while achieving the assessed development return.

7.16 Montagu Evans concludes that comprehensive refurbishment would be unviable and undeliverable. Its updated sensitivity commentary states that construction costs would need to fall by approximately 30% alongside a rental increase of approximately 30% to achieve the benchmark land value. This illustrates the scale of change required to reverse the assessed deficit, rather than a marginal shortfall capable of being resolved through modest adjustments.

7.17 The occupational evidence reinforces that conclusion. Bray Fox Smith identifies 6 Roundwood as a building refurbished in 2020 that remained vacant for approximately five years before securing an occupier. Its supply schedule also records marketing periods of approximately three years at Union, two years at 5 The Square and four years at 2 The Square, all identified as Grade A accommodation. These examples demonstrate that delivering improved offices does not ensure timely occupation.

7.18 Office refurbishment would therefore require substantial capital expenditure ahead of an uncertain letting outcome, with finance and holding costs continuing throughout the intervening period. The evidence supports the conclusion that the tested comprehensive refurbishment is not a realistic delivery strategy as it is not commercially viable for any landowner as a business case. This conclusion arises from the relationship between expenditure, achievable income, letting risk and investment value, rather than a preference for a more profitable alternative.

Option 3: Redevelopment for alternative employment uses

7.19 The third alternative is to maintain productive employment use through accommodation aligned with demonstrable occupational demand. Relevant options include replacement offices, research and development, light industrial activities, general industrial uses and storage and distribution.

7.20 Replacement offices would remain exposed to the occupational conditions identified by Bray Fox Smith, including competing availability, constrained rental values and extended letting periods. New construction would not itself remove those market risks. Although the refurbishment appraisal does not establish the viability of every possible new-office scheme, the agency evidence provides limited support for speculative replacement offices as a dependable solution for these plots.

7.21 The positive case for industrial-led redevelopment is supported by Montagu Evans' Industrial and Logistics Market Overview. It identifies Heathrow and its surrounding catchment as a diverse industrial market, with demand from freight forwarding, aviation-related businesses, food and beverage operators, third-party logistics, e-commerce and light manufacturing.

7.22 The report identifies 16 requirements over the last 12 months within the 51,000–100,000 sq ft size bracket for Heathrow and surrounding markets, totaling approximately 1.02 million sq ft when measured against the maximum areas sought. This bracket broadly corresponds with the scale of the proposed buildings.

7.23 Montagu Evans recommends conventional single-storey, standalone industrial accommodation, identifying its operational advantages and broader occupational appeal. Its comparison with multi-storey industrial schemes highlights additional construction costs, constrained circulation and loading, increased management requirements and a narrower occupier base. The proposed two-unit single storey arrangement responds to that advice while retaining a building separation and landscape structure suited to the park.

7.24 Flexibility for a HQ building with light industrial, general industrial and storage/distribution activities would allow the buildings to respond to a wider range of occupier requirements. This provides a more adaptable employment proposition than reliance on a single specialist market. The final permitted activities and operational arrangements must nevertheless remain consistent with the technical assessments and the sensitive setting.

7.25 The Site's position close to the principal estate entrance also offers a practical servicing advantage, limiting the need for associated vehicles to circulate through the wider park. The architectural and landscape revisions seek to accommodate those

operational needs through separate pavilion-influenced buildings, retained structural planting and rear service yards.

Overall assessment

7.26 The evidence identifies substantial obstacles to continued office use: prolonged vacancy, unsuccessful marketing of 1 Longwalk, a competitive occupational market and a significant deficit in the tested refurbishment appraisal. Retaining the existing use cannot therefore be treated as an assured delivery outcome.

7.27 Industrial-led redevelopment has a positive market rationale supported by Montagu Evans' demand and specification advice. It offers a credible route to renewed employment activity and income-producing occupation, improving the owner's capacity to meet continuing property and estate obligations.

7.28 These considerations provide substantial support for redevelopment. They must be assessed alongside the distinct marketing position of each building, the applicable office-loss policies, the effects on the Registered Park and Garden and the measures necessary to secure acceptable operations. Having assessed the alternatives for the Site, it is concluded that the proposed redevelopment represents the most appropriate option. Section 9 assesses the Proposals against the relevant national, regional and local planning policies and material considerations.

08

Planning policy context

08 Planning policy context

8.1 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that applications be determined in accordance with the development plan unless material considerations indicate otherwise.

National planning policy

8.2 The National Planning Policy Framework, published on 17 August 2026, is a material consideration. It is supported by Planning Practice Guidance, including guidance concerning decision-making, viability, design, heritage, transport, flood risk, pollution and biodiversity net gain.

8.3 The Planning Practice Guidance (PPG), commonly referred to as the National Planning Practice Guidance, is the Government's online guidance supporting the interpretation and application of the National Planning Policy Framework. It provides practical advice on matters including decision-making, viability, design, heritage, transport, flood risk and biodiversity net gain. The guidance is updated periodically and is a material consideration where relevant to the determination of planning applications.

The Development Plan

8.4 The statutory Development Plan comprises the Hillingdon Local Plan: Part 1 — Strategic Policies (November 2012); the Hillingdon Local Plan: Part 2 — Development Management Policies (January 2020); the Hillingdon Local Plan: Part 2 — Site Allocations and Designations (January 2020); and The London Plan (March 2021).

The London Plan

8.5 The London Plan is the Mayor of London's statutory spatial development strategy for Greater London. Published in March 2021, it establishes the strategic framework for development across the capital, including employment, housing, design, heritage, transport and environmental matters. It forms part of the development plan against which planning applications in Hillingdon are assessed.

Supplementary Planning Documents and Guidance

8.6 Supplementary guidance assists the interpretation and implementation of policy but does not have the same status as the adopted development plan. The directly relevant Hillingdon documents are:

Guidance	Relevance
Planning Obligations SPD, July 2014	Addressing site-specific mitigation and obligations
Accessible Hillingdon SPD, September 2017	Accessible Hillingdon SPD, September 2017

8.7 The Hillingdon Growth Plan 2036 establishes the Council's strategic framework for economic growth and regeneration, organised around the themes of Innovate, Connect and Thrive. It is a relevant material consideration insofar as its objectives relate to the application. It does not form part of the statutory development plan or replace the adopted employment and heritage policies.

8.8 Relevant Mayoral guidance includes:

Guidance	Relevance
Energy Assessment Guidance 2022, including its Part L cover note	Energy strategy, carbon calculations and reporting.
"Be Seen" Energy Monitoring LPG, September 2021	Monitoring and reporting operational energy performance.
Whole Life-Cycle Carbon Assessments LPG, March 2022	Embodied and operational carbon assessment.
Circular Economy Statements LPG, March 2022	Retention, reuse, material efficiency and demolition/construction waste.
Sustainable Transport, Walking and Cycling LPG, November 2022	Sustainable access and transport provision.

Guidance	Relevance
Air Quality Neutral LPG and Urban Greening Factor LPG, February 2023	Air-quality assessment and evaluation of proposed greening, applying the relevant use-specific requirements.
Optimising Site Capacity: A Design-led Approach LPG, June 2023	Context, development capacity and design-led assessment.
Control of Dust and Emissions During Construction and Demolition SPG, July 2014, read with the July 2024 Practice Note	Construction dust, emissions and updated machinery requirements.

Emerging Planning Policy

8.9 The Draft London Plan was published for consultation in July 2026. Consultation ran from 16 July to 15 October 2026. It remains an emerging plan and has not replaced the adopted London Plan. The draft identifies the wider Stockley Park area among candidate locations with residential-led and industrial growth potential. This provides relevant strategic context for considering the area's evolution. However, the broad identification does not establish that the application plots have been allocated for industrial development or remove the need to assess their adopted designations and heritage constraints.

8.10 Hillingdon published its notice of intention to commence preparation of a new Local Plan on 12 May 2026 and undertook scoping consultation between 9 July and 21 August 2026. Its revised timetable, published on 29 September 2026, anticipates submission in June 2028 and consideration of adoption on 22 January 2029. The review remains at an early stage and does not replace the adopted policies.

8.11 The weight given to emerging policies must reflect their stage of preparation, unresolved objections and consistency with national policy, in accordance with NPPF Policy DM4.

8.12 The principal policies relevant to the application are scheduled at Appendix A. Their application to the proposals, including any policy conflict and the material considerations advanced in support of permission, is addressed in the Planning Assessment.

09
Planning assessment

09 Planning assessment

9.1 This Section assesses the Proposals against the policies of the Development Plan and against other material considerations. This Section addresses the principal planning issues thematically, and in each case sets out the relevant policy requirements before applying them to the Proposals.

Principle of Development

9.2 The Proposals would deliver approximately 11,006 sq m GIA of modern employment accommodation within two buildings, providing flexibility for light industrial, general industrial and storage/distribution activities, with ancillary offices. The Site would remain in employment use. The principal land-use question is therefore whether the replacement of the existing office accommodation with the proposed employment uses is justified, having regard to the Site's office-growth designation, commercial circumstances and the effects of the proposed operations.

9.3 Policies E1 and E2 of Local Plan Part 1 support the protection of employment land and direct employment growth towards identified locations. However, Stockley Park's designation as a Locally Significant Employment Location ('LSEL') and Office Growth Location establishes a particular office-policy context. Retaining employment land is a positive consideration, but does not, by itself, demonstrate that every employment use is appropriate.

9.4 The Proposals should also be considered against the Hillingdon Growth Plan 2036. The Plan identifies Hayes, Stockley Park and the Old Vinyl Factory as a focus for creative activity, innovation and renewal. Its wider objectives include modernising established employment sectors, supporting businesses to grow and remain within the borough, and connecting residents with economic opportunities.

9.5 The Proposals offer a practical contribution through investment in vacant employment plots, adaptable accommodation and opportunities for renewed occupation. Their flexibility could accommodate a range of industrial businesses and supply-chain activities, although no particular occupier or association with the creative and technology sectors is assumed. The proposed Employment and Skills Plan provides a further means of translating development activity into opportunities for local

residents. The Growth Plan therefore provides additional strategic context supporting the case for productive employment renewal.

Application of the employment and office-loss policies

9.6 Policy DME 1(C) supports office, research and development and light industrial activities within LSELs. The proposed light industrial use is consistent with that category. Flexibility is sought to allow B2 and B8 occupation to help market the buildings to a broader range of tenants and operators in the area, which requires assessment under DME 1(D). That policy provides alternative routes concerning the realistic prospects of development for the supported uses or a two-year period of vacancy and consistent marketing, together with consideration of compatibility with the Local Plan.

9.7 Policy DME 3(B) separately addresses the loss of offices in preferred office-growth locations. It requires evidence of two years' active marketing, the absence of a viable office-use option taking account of refurbishment, and protection of surrounding employment uses. These requirements must be addressed alongside DME 1.

9.8 The application seeks flexibility across the proposed employment uses rather than a commitment that either building will necessarily operate as light industrial accommodation. Accordingly, the assessment considers the B2 and B8 activities that could occur throughout the permitted floorspace. Ancillary offices would support those operations but would not constitute equivalent replacement of the existing independent office capacity.

Evidence concerning continued office use

9.9 The vacancy and marketing histories of the two existing buildings differ. Montagu Evans records that 1 Longwalk has been vacant since November 2020 and marketed by Bray Fox Smith since January 2021. The building has therefore remained vacant for almost six years. The same assessment records that 2 Longwalk became vacant in November 2024. Both buildings are stripped out and require investment before they can compete effectively for office occupiers.

9.10 Bray Fox Smith's report provides direct evidence concerning 1 Longwalk. Marketing has tested occupation in its existing condition and on the basis of a proposed full refurbishment. Promotion included property particulars, circulation to agents and prospective occupiers, and advertising through commercial property platforms. The report records no leasehold interest in taking the building either as existing or following refurbishment. Freehold enquiries were received, but did not secure occupation. This provides substantial support for the conclusion that vacancy is not simply the consequence of an ordinary short-term gap between occupiers. Its duration substantially exceeds the two-year policy period, meeting the policy test.

9.11 The wider market evidence reinforces the difficulty of securing office occupation. Bray Fox Smith identifies approximately 733,946 sq ft of available offices at Stockley Park, representing approximately 49% vacancy at the report date. Its examples include Grade A accommodation marketed for approximately three years at Union, two years at 5 The Square and four years at 2 The Square. It also records that 6 Roundwood remained vacant for approximately five years following refurbishment before securing an occupier. These examples demonstrate that investment in specification does not ensure timely occupation; they do not establish an absence of all office demand.

9.12 The refurbishment option has been tested quantitatively through Montagu Evans' Office Use Viability Assessment, supported by Pulse Consult's construction cost advice and Bray Fox Smith's occupational evidence. The assessment considers comprehensive Grade A refurbishment of both buildings, reflecting the specification sought by most active office occupiers. The updated assessment identifies approximately £32.53 million of refurbishment construction costs, excluding contingency and professional fees. It also allows for finance, letting incentives, marketing and approximately £7.32 million of void costs. Despite adopting a rent of £42.50 per sq ft which is above the prime headline rent cited for Stockley Park, the appraisal generates a negative residual land value of approximately £17.06 million. Against the £9.9 million benchmark land value, the reported shortfall is approximately £26.96 million.

9.13 Montagu Evans concludes that the tested refurbishment would be unviable and undeliverable. This provides substantial evidence in support of DME 3(B)(ii). It is clear from the report that the assessed expenditure and letting risk are not supported by the investment value of the refurbished offices. The assessment should be read with the alternatives considered in Section 7 and its supporting cost, market and sensitivity evidence.

9.14 London Plan Policy E1 is consistent with an evidence-led approach to office retention. Parts D and E recognise viability and the release of surplus capacity. However, Parts G, H and I also require consideration of suitable workspace and the potential reuse of large offices as smaller units.

Proposed alternative employment uses

9.15 The Proposals respond to an identified occupational market rather than relying solely on the difficulties facing offices. Montagu Evans' Industrial and Logistics Market Overview identifies Heathrow and its surrounding catchment as a diverse employment market, with requirements from freight forwarding, aviation-related businesses, food and beverage operators, third-party logistics, e-commerce and light manufacturing.

9.16 The report identifies 16 requirements within the 51,000–100,000 sq ft bracket in Heathrow and surrounding markets, totalling approximately 1.02 million sq ft when measured against the maximum areas sought. This bracket broadly corresponds with the proposed buildings.

9.17 Montagu Evans recommends conventional single-storey, standalone industrial accommodation, identifying its operational efficiency and broader occupational appeal relative to more complex multi-storey formats. The proposals respond through two independently occupiable units with dedicated servicing and ancillary offices. Their flexibility would allow adaptation to different industrial and distribution requirements, subject to the operational parameters assessed through the application.

9.18 This employment proposition supports London Plan objective GG5, which seeks appropriate employment capacity and economic diversification. NPPF Policy E4 supplies further strategic support for industrial and logistics provision. Policy E7 provides context for efficient industrial development but is not relied upon as an independent basis for overriding Stockley Park's office designation.

9.19 The Site also has a practical relationship with the industrial catchment: it is close to Heathrow and the strategic road network, with access via Longwalk Road, Bennetsfield Road and the A408. Its position near the principal estate entrance limits the need for servicing vehicles to circulate through the wider park. These advantages are relevant to NPPF Policy E3, alongside that policy's requirements concerning environmental effects, neighbouring uses and night-time operations.

Employment benefits and compatibility with neighbouring uses

9.20 Trium Environmental Consulting's Socio-Economic Benefit Statement estimates that the proposals could support approximately 115–296 FTE jobs. This is expected to generate £206,480 to £531,280 in annual local expenditure and £4.1 million to £10.6 million in annual GVA. It also estimates 83 direct construction FTE jobs over an indicative 17 month programme, as well as an additional 27 indirect and induced jobs per year.

9.21 Those forecasts demonstrate the potential to restore productive activity to currently vacant plots. The absence of current occupational activity, the evidence concerning office deliverability and the identified industrial market support substantial positive weight for the evidenced economic benefits under NPPF Policy E2, which requires that substantial weight is given to economic benefits.

9.22 Compatibility with surrounding employment uses is addressed through the transport, servicing, noise, air-quality, lighting and landscape assessments. Rear service yards, managed deliveries, parking controls and the landscape framework seek to accommodate the operational requirements while protecting neighbouring occupiers.

Trium's noise assessment provides positive support under its assessed assumptions, but the eventual use and operating arrangements must remain within the scope of the technical evidence and any necessary controls.

9.23 Renewed occupation would establish an income-producing use capable of supporting the continuing costs of ownership, including estate charges contributing to the management and maintenance of Stockley Park. This provides a practical link between securing a commercially sustainable future for the application site and supporting the upkeep of the wider Registered Park and Garden. Although the obligation to meet those charges already exists, the proposals would improve the financial basis from which that obligation can be discharged. This is a supporting consideration in favour of bringing the Site back into productive use; the weight attributable to any specific heritage benefit depends on the evidence concerning estate funding and maintenance arrangements.

Conclusion on the principle of development

9.24 There is a substantial positive case for an alternative employment use on the Site, evidence by prolonged vacancy, documented unsuccessful office marketing and wider evidence of the challenges facing office occupation at Stockley Park.

9.25 The demonstrated delivery difficulties of continued office use, together with the increasing need for industrial floorspace within the borough and London as a whole and positive employment and regeneration benefits, provide compelling material considerations supporting the proposed land-use change. The principle should therefore be supported, including through an expressly reasoned departure where necessary, subject to the assessment of heritage effects, operational compatibility and the Development Plan as a whole.

Heritage and Conservation

9.26 The principal heritage consideration is the effect of the proposals on the significance of Stockley Park Grade II Registered Park and Garden ('RPG'). The application site lies within the registered boundary. The assessment must therefore consider changes within the designated landscape itself, including the contribution of the existing buildings, planting and spaces, together with effects on the settings of nearby heritage assets.

9.27 Policy HE1 of Local Plan Part 1 establishes the strategic objective of conserving and enhancing Hillingdon's historic environment. Policies DMHB 1 and DMHB 8 of Local Plan Part 2 provide the principal detailed tests. These concern the avoidance and justification of harm, respect for the landscape's character and views, and provision for restoration and long-term management. DMHB 8(C) establishes that proposals

detrimental to an RPG's significance will normally be refused. Any identified conflict must therefore be addressed expressly.

9.28 London Plan Policy HC1 requires the conservation of heritage significance, consideration of cumulative change and early integration of heritage into design. These requirements support an assessment of the development's relationship with the wider designed ensemble, rather than its appearance in isolation.

9.29 NPPF Policies HE4–HE6 require harm to be avoided or minimised, clearly justified and assessed by reference to significance. Conservation attracts substantial weight; any harm carries considerable importance and weight. HE6(4) requires harm to be weighed against public benefits, while HE6(5) and (6) impose additional tests for substantial harm or total loss. HE5 defines substantial harm by reference to a serious effect on a key element of significance.

Significance and the contribution of the site

9.30 Stockley Park's significance derives from its pioneering development as a business park, its integrated architectural, engineering and landscape design, and the survival of a coherent designed environment. The transformation of former mineral workings and contaminated land forms part of its historic interest. Its landscape structure combines formal commercial plots, water features, circulation routes and planting with the more informal landforms of the country park and golf course. Historic England Register Entry 1466074.

9.31 Montagu Evans' Heritage, Townscape and Visual Impact Assessment ('HTVIA') explains the importance of the landscape framework in organising the business park. Formal hedges define and screen functional areas; avenues of clipped lime trees identify pedestrian routes; and buildings occupy individual plots within a consistent landscape structure. The relationship between architecture and landscape is integral to the asset's significance. The assessment consequently considers the retention of that organising structure alongside the detailed architectural response.

9.32 The application site contributes through its formal planting, pavilion buildings, separation between plots and relationship with Longwalk Road and the adjoining landscape. Although the site occupies a relatively small proportion of the RPG, its contribution cannot be assessed solely by reference to its area.

9.33 The existing buildings are neither statutorily nor locally listed. This is a relevant distinction within Stockley Park, where the Council has expressly recognised the individual architectural and historic interest of selected buildings through inclusion on its Local List. That recognition does not extend to 1 and 2 Longwalk. Their common authorship and pavilion characteristics should therefore not, without a building-specific assessment, be treated as establishing equivalent individual significance to the locally

listed examples. Montagu Evans considers their individual architectural quality limited, while recognising their illustrative contribution to the first phase of the business park.

9.34 The proposals consequently require assessment by reference to the buildings' actual contribution to the significance of the Registered Park and Garden, rather than an assumed equivalence with locally listed buildings. Policy DMHB 3's presumption in favour of retaining buildings included on the Local List should not be applied to 1 and 2 Longwalk merely because they share characteristics with those selected for inclusion. Their replacement must nevertheless be justified through the assessment of the registered landscape, including the loss of original fabric and the extent to which the proposed buildings sustain its characteristic architectural and spatial relationships.

Design response and effects on significance

9.35 The proposals have been developed through detailed pre-application engagement with both the London Borough of Hillingdon and Historic England which has resulted in the submitted proposals. The design has been developed around two separately expressed buildings within landscaped plots. This arrangement maintains an identifiable division between the units and a central route through the site. It responds to the cellular organisation of the business park and avoids the extensive, uninterrupted frontage associated with a single larger building.

9.36 The architectural response draws on the pavilion character through rectilinear forms, pitched roof profiles, a predominantly white material palette and horizontal glazing. Office accommodation and principal entrances face the public frontage, while servicing is concentrated towards the rear. These measures provide a coherent relationship with the surrounding commercial architecture and reduce the prominence of operational areas in the principal public views.

9.37 The replacement buildings would nevertheless be slightly larger than those they replace. Their increased visibility must be assessed against the intended relationship between built form and landscape. Montagu Evans identifies the principal visual changes as occurring around the immediate road network, adjoining pedestrian routes and certain elevated positions within the golf course. Its assessment considers the effects more contained across the wider RPG because of intervening vegetation and development.

9.38 The landscape strategy forms a substantive part of the response. A limited intervention approach has been adopted with replacement planting only where necessary, maintaining the principals of the RPG. Retention of the lime-tree necklace and boundary structure, reinforcement of hedging around service areas and planting along the central avenue seek to maintain the hierarchy of landscape features. The north-eastern amenity space would be retained and enhanced through planting, seating and

renewal of deteriorated surfacing and materials. These interventions respond to identifiable characteristics of the designed landscape.

9.39 These measures must also be considered alongside the loss of existing planting and the introduction of service yards, fencing, plant and ancillary structures. Their heritage effects depend on location, visibility, materials and their relationship with retained vegetation. Detailed coordination of landscape, architectural and engineering proposals has therefore been necessary to ensure that screening and planting shown as mitigation can be delivered and maintained.

Assessment of harm and landscape enhancement

9.40 The HTVIA identifies a low level of harm associated with the removal of landscape areas along the entrance avenue to 2 Longwalk and towards the rear of the plots. It also identifies enhancements through reinforcement of the planting structure, treatment of the north-eastern corner and improvements intended to support landscape longevity and climate resilience. These enhancements seek to improve elements of the landscape which are falling into disrepair as a result of vacancy, changes in the climate from prolonged periods of drought and age. Montagu Evans concludes that, taking those interventions into account, the proposals would on balance cause no overall harm to the RPG or nearby locally listed buildings.

The heritage balance

9.41 The proposals would deliver a coordinated programme of landscape renewal within a prominent part of the RPG. The principal heritage benefits comprise reinforcement of the original landscape structure, enhancement of the north-eastern amenity space and provision for continuing landscape management. These interventions advance the conservation and enhancement objectives of Local Plan Part 1 Policy HE1 and London Plan Policy HC1. They also respond to NPPF Policy HE4(1), which supports uses consistent with conservation and recognises heritage assets' contribution to local character and sustainable communities.

9.42 Exterior Architecture's strategy draws upon the original landscape principles, including formal avenues, structured hedging and defined planting areas that organise the commercial plots. Reinforcement of these features would strengthen the legibility of the registered design. This responds directly to DMHB 8(A), concerning respect for the landscape's special character, environmental quality and important views, and to HC1(C), concerning conservation of significance and the identification of enhancement opportunities. The benefit derives from sustaining identifiable characteristics of the historic landscape rather than simply providing additional planting.

9.43 Retention of the lime-tree necklace would conserve an established element of the landscape framework. Additional planting along the central avenue and reinforcement of boundary hedges would complement that retained structure. Where these interventions repair gaps or reinforce weakened features, they would strengthen the experience of separate commercial buildings within landscaped plots. This provides a practical response to the conservation objectives of HE1 and DMHB 1, supported by the significance-led approach required by HC1.

9.44 The north-eastern amenity space provides a specific opportunity for enhancement. Its established layout and relationship with the pond would be retained, with improvements to planting, seating, surfacing and pond-edge treatments. Renewal of deteriorated elements would support continued use and appreciation of a landscape space that expresses Stockley Park's integration of commercial buildings, water and shared amenity. This responds to DMHB 8(B)'s restoration objective and the opportunities for enhancement identified in HC1(C).

9.45 Detailed materials remain important to that assessment. The proposed replacement of timber elements with stone should demonstrate compatibility with the space's established geometry, pond setting and wider material palette. Durability supports continuing maintenance.

9.46 The planting strategy also seeks to sustain that character over time. Montagu Evans identifies opportunities to introduce trees, shrubs and groundcover reflecting the original landscape approach while improving climate resilience. Appropriate species selection and establishment would help perpetuate the formal planting structure through future renewal. This supports HE1's conservation objectives and responds to DMHB 8(B)'s emphasis on long-term management. Any ecological benefits would complement the heritage case where planting remains compatible with the significance of the designed landscape.

9.47 Productive occupation provides a further supporting consideration. Stockley Park is a managed landscape requiring recurring expenditure. Returning the application site to income-producing employment use would improve the financial basis from which its owner can meet continuing estate liabilities, including charges supporting upkeep of the wider park. This is consistent with HC1(B)(4)'s objective of integrating conservation benefits with the economic viability and environmental quality of a place. It also supports the relationship between conservation and sustainable local economic activity recognised in HE4(1)(a). London Plan Policy HC1.

9.48 The office-market and viability evidence explains the relevance of this consideration. Prolonged vacancy leaves ownership and estate costs to be met without occupational income, while the tested comprehensive office-refurbishment option produces a substantial viability deficit. The proposed employment use offers an alternative route

to occupation and a stronger basis for meeting recurring costs. The supporting benefit is improved financial resilience, assessed alongside the direct landscape enhancements.

9.49 The heritage balance must distinguish between measures that avoid or reduce harm and improvements that positively enhance significance. Under HE5(2)(a), enhancement or better revelation of significance constitutes a positive effect. HE6(2) supports proposals having a positive effect on designated heritage assets, while HE6(1) requires substantial weight to conservation. These provisions support proper recognition of the proposed enhancements, without removing the need to assess adverse effects elsewhere in the scheme.

9.50 The Applicant considers that the landscape renewal, reinforcement of the original design structure and provision for continuing stewardship offer identifiable conservation benefits. These should receive weight according to their contribution to significance and the certainty of their delivery. They must be considered alongside the loss of original buildings and planting, increased building scale and operational effects. Any residual harm remains a matter of considerable importance and weight under HE6(3), to be weighed against public benefits under HE6(4).

9.51 Taken together with the wider employment and regeneration benefits, the Applicant considers that the heritage enhancements provide a persuasive justification for approval against the limited harm identified in the HTVIA. This conclusion recognises DMHB 8(C)'s normal resistance to detrimental effects and does not assume that landscape improvements establish compliance with every heritage policy. It rests on a reasoned assessment of significance, harm, enhancement and public benefit, supported by secured implementation and management.

Design, Scale and Massing

9.52 The Proposals have evolved through an extended process of design development involving Hillingdon's planning, design and conservation officers, Historic England and the Applicant's architectural, landscape and heritage consultants. The resulting scheme seeks to reconcile two connected objectives: an architectural response appropriate to Stockley Park's distinctive Phase I character, and employment accommodation capable of meeting contemporary industrial requirements.

9.53 Local Plan Part 1 Policy BE1 requires high-quality development appropriate to its context and contributing positively through layout, form, scale and materials. Part 2 Policy DMHB 11 addresses contextual relationships, detailing, materials, adaptability and landscape. DMHB 12 concerns the quality and integration of streets and public spaces. These requirements inform the assessment of the buildings and their surrounding spaces as a coordinated design.

9.54 London Plan Policies D1, D3 and D4 establish the importance of understanding context, optimising capacity through design and scrutinising proposals throughout their development. Policy D5 addresses inclusive design.

9.55 NPPF Policy DP3 requires a contextual response, with relevant principles concerning built form, identity, movement, public space, climate and nature. Policy DP4 requires attention to design quality throughout evolution, assessment and delivery. The appropriate assessment therefore encompasses appearance, functionality and the quality of the completed environment.

Pre-application engagement and design evolution

9.56 The Design and Access Statement records the options considered and successive amendments made through pre-application engagement with the London Borough of Hillingdon and Historic England.

9.57 The Council's initial concerns extended beyond architectural style. Officers questioned the height and bulk of the buildings, reduced gaps between them, the loss of structural planting and the extent of hardstanding. They also identified the importance of lightweight pavilion forms and their relationship with the landscape. These comments established substantive matters for the design team to address through the arrangement, dimensions and treatment of the scheme.

9.58 The Applicant responded through changes to both the development envelope and the external architecture. The building footprints and proposed floorspace were reduced from the initial submission; the central access arrangement and north-eastern landscape space were retained; servicing and parking were refined; and a greater proportion of the established landscape was incorporated into the design. These amendments demonstrate that the consultation process materially influenced the scheme.

9.59 Historic England's April meeting provided further direction. Its representatives supported the two-unit approach over the single-unit option while continuing to raise matters concerning scale, roof form and structural planting. The design team subsequently reduced the proposed clear internal height from 15 metres to 12.5 metres and developed the roof treatment to give greater expression to the pavilion silhouette.

9.60 The July meeting identified further concerns about frontage, the relationship with the roundabout and garden, elevational proportions, the parapet treatment and the extent of glazing. Officers requested comparative elevations and contextual views. Subsequent refinements included removal of the prominent parapet treatment, greater expression of the pitched roof, additional glazing and a more articulated façade informed by the original Arup buildings.

9.61 The principal responses can be summarised as follows:

Matter raised through consultation	Design response
Excessive bulk, constrained spacing and loss of landscape	Reduced footprints, retention of the central route and refinement of the interface between buildings and planting.
Roof profiles insufficiently related to the pavilion character	Removal of lantern features, reduction in internal clearance and development of an exposed pitched-roof silhouette.
Flat elevations and an insufficient relationship with Phase I architecture	Contextual study of the Phase 1 buildings, horizontal glazing, a predominantly off-white palette, recessed panels, feature flashings and cross-bracing references.
Weak frontage and relationship with adjoining spaces	Refinement of office elevations, entrances and glazing, activation, alongside retention of the north-eastern amenity space.
Loss of structural planting and an overly engineered landscape	Greater emphasis on retention, reinforcement of established hedging and refinement of planting and hardstanding arrangements.

9.62 This represents sustained and constructive engagement of the kind envisaged by NPPF DP4 and London Plan Policy D4. The Applicant has responded through material revisions while maintaining an operationally coherent scheme. The value of that process lies in the resulting design improvements.

Architectural purpose and relationship with Phase I

9.63 The architectural strategy responds directly to officers' emphasis on the established Arup pavilion language. Its purpose is to give the proposed industrial buildings a public-facing architectural presence that relates closely to Stockley Park's office pavilions. The characteristic elements include a restrained palette, horizontal fenestration, expressed roof profiles, panelled elevations and a clear relationship between buildings and planted spaces.

9.64 These references are developed through the composition of the elevations. Predominantly white and off-white panels establish the principal framework, with recessed glazing and darker elements introducing depth and shadow. Feature flashings and changes in panel depth break down the elevations into a measured

rhythm. The proposed non-structural cross-bracing detail recalls an identifiable aspect of the Phase I buildings and contributes to the façade's articulation. This also acts to tie in with the retain amenity building located to the north of unit 100.

9.65 The frontage accommodates ancillary offices and entrances, providing windows and occupied accommodation/activation facing the public realm. Servicing is concentrated towards the rear so that it is hidden and reflective of the existing rear car park and original Arup design objection. This arrangement brings activity and visual interest to the principal elevations while allowing the industrial accommodation to function efficiently.

9.66 The roof design has also been developed as part of the architectural composition. Removal of the earlier lantern and parapet features allows the pitched profile to be more clearly appreciated. The roof and façade should be read together: the intended pavilion expression depends on their proportions, silhouette and detailing, as well as colour and materials.

Industrial functionality

9.67 Every effort has been made to ensure that the proposals reflect the design intent of the original Arup masterplan principals and the Phase 1 pavilion buildings. However, these buildings are of an age, and it is important that any new building accommodate contemporary requirements for fire safety, energy performance, accessibility, maintenance and durability. The Design and Access Statement records, for example, the replacement of glazing with cladding at fire boundaries. The elevational rhythm is carried through these areas using coordinated panel treatments. This illustrates how the Phase I references have been adapted to the technical requirements of the proposed buildings.

9.68 The detailed design must maintain that coordination. The final envelope specification should reconcile fire performance and thermal requirements with the proposed recesses, flashings, glazing and material finishes. These characteristics form part of the planning design and should be retained through technical development and construction.

9.69 Operational suitability is equally important. The proposed uses require appropriately configured internal space, suitable clear heights, loading access, manoeuvring areas and a workable relationship between warehouse accommodation and ancillary offices. The design response therefore addresses both the park-facing elevations and the practical arrangements behind them. DMHB 11(A)(iii), concerning adaptable internal design, provides a relevant policy basis for considering this functional performance.

Scale, height and massing

9.70 The proposals provide approximately 11,006 sq m GIA across two independently expressed buildings. The submitted sections indicate maximum roof heights of approximately 18.74 metres for Unit 100 and 18.41 metres for Unit 200, measured above their respective finished-floor levels. The clear internal height is 12.5 metres. The external dimensions accommodate the roof structure and profile, which form an integral part of the architectural response to Stockley Park's pavilion character.

9.71 The proposed height must be considered alongside the buildings' form, separation, setting and visibility. The application site comprises two established commercial plots within a spacious and mature landscaped environment. Its capacity to accommodate development is influenced by that landscape structure, the spaces between buildings and the relationship with surrounding roads and open areas. These characteristics provide a setting in which an increase in building height can be accommodated without necessarily disrupting the coherence of the wider business park.

9.72 The two-unit arrangement maintains a clear division between the buildings and retains the central access route as an organising feature. This separation breaks down the overall development into distinct elements and maintains opportunities to appreciate buildings within landscaped plots. Retained structural planting, reinforced hedging and the proposed central avenue support that relationship. The Applicant considers that this combination of building separation and landscape structure enables the proposed scale to be accommodated while sustaining the characteristic spatial organisation of this part of Stockley Park.

9.73 The architectural treatment further moderates the apparent mass. The expressed pitched roofs establish a recognisable pavilion silhouette, while horizontal glazing, recessed panels, feature flashings and changes in façade depth introduce articulation and a measured elevational rhythm. These features divide the building envelopes into smaller visual components and respond to the architectural language of the surrounding Phase I buildings. Their effectiveness depends on maintaining the proposed proportions, detailing and material quality through construction.

9.74 The proposed scale also reflects the operational requirements of the employment accommodation. The reduction in clear internal height from 15 metres to 12.5 metres represents a substantive response to consultation while retaining space intended to meet contemporary industrial requirements. Height, footprint and servicing have consequently been considered together, alongside the landscape constraints, to achieve accommodation that is both contextually responsive and fit for its intended purpose.

9.75 Montagu Evans' assessment identifies the principal visual changes around the immediate road network, adjoining pedestrian routes and certain elevated positions within the golf course. Across much of the wider RPG, intervening vegetation and development contain visibility. Mature planting therefore contributes to the setting and containment of the development, although the architectural composition must also perform satisfactorily in closer and seasonally more open views.

9.76 The Applicant considers that the proposed height and massing are appropriate to the capacity and characteristics of these plots. The buildings would be taller and more prominent locally, but their separation, articulated roof forms, detailed elevations and landscape setting provide a coherent relationship with the surrounding commercial environment. This supports the contextual design objectives of Policy BE1, Policy DMHB 11(A)(i) and London Plan Policy D3.

Conclusion on design and conservation

9.77 The proposals represent the outcome of sustained pre-application engagement with Hillingdon and Historic England. That process has materially influenced the scheme through reduced footprints and internal heights, revised roof profiles, greater landscape retention and a more detailed architectural response to the Phase I pavilion buildings. The resulting design demonstrates how officer comments have informed the layout, scale and appearance of the development.

9.78 The proposed architecture combines the characteristic off-white/hamlet palette, horizontal fenestration, expressed roof forms and façade articulation of Stockley Park with contemporary construction requirements and functional industrial accommodation. The two-unit arrangement, separation between buildings and retained landscape structure provide the framework within which the increased height and massing would be experienced. The Applicant considers that these measures achieve a coherent relationship with the surrounding park while providing adaptable employment buildings suited to their intended use.

9.79 Accordingly, the Applicant considers that the proposals satisfy the contextual design objectives of Local Plan Policy BE1 and Policy DMHB 11, supported by the approach to layout, movement and external spaces under Policy DMHB 12. The scheme also responds positively to London Plan Policies D1, D3 and D4 and NPPF Policies DP3 and DP4 through its analysis of context, iterative design development and integration of architectural quality with practical performance.

Landscape and Trees

9.80 The landscape proposals are integral to the development's design and its relationship with the RPG. They provide the framework within which the replacement buildings

would be experienced, organise movement and amenity space, and accommodate the operational requirements of the proposed employment uses. The assessment therefore considers the quality and function of the landscape alongside tree retention, replacement planting and continuing management.

9.81 Local Plan Part 1 Policy BE1(7) seeks attractive, functional and accessible external spaces that respect local landscape character and support biodiversity. Part 2 Policy DMHB 14 addresses retention and enhancement of natural features, appropriate hard and soft landscaping, tree surveys, protection measures and replacement planting. Policy DMHB 8 additionally requires respect for the registered landscape and provision for its restoration and long-term management.

9.82 London Plan Policies G1 and G5 promote integrated green infrastructure and urban greening. Policy G7 seeks retention of valuable trees wherever possible and adequate replacement reflecting the benefits of trees lost.

9.83 NPPF Policy N2(1)(d) supports conservation and enhancement of natural features of visual, historic or ecological value and the integration of development through landscaping. Policy N3 addresses suitable tree planting, species selection, compatibility with infrastructure and long-term maintenance. These objectives require consideration of planting quality, location and prospects for successful establishment.

Landscape strategy and design evolution

9.84 Exterior Architecture's Landscape Statement establishes three connected objectives: responding to the site's history, strengthening its present role as a gateway to Stockley Park, and sustaining its landscape character through future environmental change. The strategy draws upon the original relationship between formal planting, commercial plots, circulation routes and shared amenity spaces.

9.85 Pre-application engagement materially influenced the landscape response. Officers emphasised the collective value of structural planting, the importance of the central avenue and the need for realistic planting arrangements around retained trees. They also questioned the extent of hardstanding and the treatment of the north-eastern amenity space. Subsequent revisions placed greater emphasis on retention, refined the building and servicing footprints, reinforced hedging and developed a more restrained approach to intervention within established landscape areas.

9.86 The proposals are organised into six character areas, each performing a defined role:

Character area	Principal contribution
Social Space	Renewal of the north-eastern amenity space through planting, seating and coordinated surface and pond-edge treatments.
Heritage Buffer	Retention and reinforcement of the avenue trees and hedges defining the plots and their relationship with the wider park.
Central Spine	A planted route between the buildings, maintaining the site's spatial organisation and reinforcing its formal landscape character.
Car Parking Frontage	Hedging, groundcover and tree planting to soften parking and support an attractive arrival experience.
Service Yards	Retained boundary vegetation and reinforced hedging to contain views of operational areas.
Habitat Focus Zone	Planting and habitat features supporting ecological interest within the landscape framework.

9.87 Together, these areas provide a coordinated response to DMHB 14(B) and G1. The landscape performs several functions simultaneously: maintaining local identity, providing amenity, defining circulation, screening operational areas and supporting environmental resilience. Its contribution is particularly important at the public-facing edges and between the buildings, where planting helps maintain the experience of separate pavilions within landscaped plots.

9.88 The existing lime-tree necklace and established hedging form important components of that structure. Their retention, together with reinforcement of the central avenue, supports continuity with the original masterplan. Proposed hedges and planting around parking and service areas reflect the established use of vegetation to distinguish and contain different functions. Grasscrete surfacing would soften the appearance of parking bays, with its detailed construction coordinated with vehicle loading and tree-root protection requirements.

9.89 The north-eastern social space would retain its established relationship with the pond and surrounding landscape. Improvements to planting, seating and deteriorated surfaces provide an opportunity to sustain its amenity function and renew its condition.

Materials and detailing must respect the character of this space, as considered in the heritage assessment.

Tree retention, removal and replacement

9.90 CBA Trees' survey provides the arboricultural baseline for assessing the scheme. The proposals seek to remove 26 Category C trees and 14 young Prunus trees, with 63 new trees proposed. These figures describe the current design position and require confirmation against the final arboricultural impact assessment and coordinated planting schedule.

Urban greening and environmental resilience

9.91 Urban greening forms an integral part of the site layout, building setting and external spaces. The landscape proposals provide approximately 6,200 sq m of retained and proposed soft landscape, compared with approximately 5,800 sq m existing. This represents an increase of approximately 400 sq m, or 7%, demonstrating that redevelopment can accommodate additional planted space alongside the operational requirements of the proposed employment uses.

9.92 The Landscape Statement reports an Urban Greening Factor ('UGF') of 0.32. The score reflects a combination of retained vegetation, proposed trees, hedgerows, planting and permeable surfaces. These elements perform complementary functions: defining the commercial plots, softening parking and servicing areas, providing amenity and supporting environmental resilience. This integrated approach responds positively to London Plan Policy G5(A), which requires urban greening to be a fundamental element of major development.

9.93 Policy G5(B) recommends an interim UGF target of 0.3 for predominantly commercial development, expressly excluding B2 and B8 uses. Although that benchmark does not automatically apply to the industrial and storage/distribution uses proposed, the reported score of 0.32 exceeds it. It therefore provides a useful indication of the provision achieved and supports the proposed flexibility for Class E(g)(iii) occupation. The exclusion of B2 and B8 from the interim benchmark does not diminish the general requirement to incorporate appropriate urban greening.

9.94 The quality and distribution of greening are particularly important within the RPG. Retention of the lime-tree necklace, reinforcement of hedging and planting along the central avenue integrate green infrastructure with the site's established landscape structure. These measures support the coordinated approach promoted by London Plan Policy G1 and the landscape objectives of Local Plan Policies BE1 and DMHB 14.

9.95 The Applicant considers that the combination of increased soft landscape, retained structural planting and a reported UGF above the interim commercial benchmark demonstrates a positive response to urban greening policy.

Management and conclusion

9.96 Continuing management is necessary to sustain the proposed landscape quality. A coordinated management regime should address establishment, irrigation, replacement of failures, management of formal hedges and avenues, and maintenance of amenity areas and surfaces. As such, the proposals have been developed in consultation with Stockley Park Management Company and the Board of Directors who currently manage the landscaped area of the Park. This has been done to ensure that the proposals can continue to be maintained within the parameters of the Park and existing management and maintenance regimes.

9.97 The Applicant considers that the landscape strategy provides a coherent response to Stockley Park's character and the requirements of the proposed employment use. Its emphasis on structural planting, a defined central avenue, screened operational areas and renewed amenity space supports the objectives of BE1, DMHB 14 and London Plan G1 and G5.

Transport, Access, Servicing and Parking

9.98 Local Plan Part 1 Policy T1 promotes appropriate development locations and sustainable accessibility. Part 2 Policies DMT 1 and DMT 2 address transport impacts and safe access; DMT 4 and DMT 5 concern public transport, pedestrians and cyclists. DMT 6 establishes parking requirements, with provision for justified variation. DMT 7 notes that freight-generating development must demonstrate convenient access to the strategic road network and avoid deleterious effects on amenity, air quality and the highway network.

9.99 London Plan Policies T2 and T4 address Healthy Streets and transport assessment; T5 concerns cycling; T6, T6.2 and T6.5 address parking; and T7 concerns deliveries, servicing and construction.

9.100 NPPF Policies TR3 and TR4 address sustainable accessibility, safe access, efficient servicing and appropriate parking. Policy TR6 requires proportionate assessment and travel planning, with refusal where residual network impacts would be severe or highway-safety impacts unacceptable. Separately, Policy E3 requires appropriate freight connections, sufficient vehicle parking and acceptable environmental effects, including where night-time operations are proposed.

9.101 Mode Transport Planning has prepared a Healthy Streets Transport Assessment ('HSTA'), supported by a Framework Travel Plan, Delivery and Servicing Plan, Car

Parking Management Plan and Outline Construction Logistics Plan. These address access, movement, parking demand, operational management and construction traffic.

9.102 The site connects to the A408 Stockley Road through Longwalk Road and Bennetsfield Road, providing onward access to the strategic network. Its position immediately adjoining the principal estate entrance is a particular advantage for servicing: vehicles can reach the development through a short section of the internal network, limiting circulation past other plots and through the wider registered landscape.

9.103 The HSTA records PTAL 1B across much of the site, with PTAL 2 at the access and part of the northern area. Accessibility must nevertheless be assessed alongside the existing employment location, walking and cycling connections, bus services and estate travel initiatives.

Access and internal movement

9.104 Both existing vehicular access points on Longwalk Road would be retained. The northern access would serve the central route, rear service yards and Unit 100 parking; the southern access would serve Unit 200 parking.

9.105 Mode's swept-path analysis assesses 16.5-metre articulated vehicles entering and leaving the northern access in forward gear, with a 300 mm clearance buffer. It also assesses manoeuvring within the service yards and routes through the wider estate should a driver miss the entrance. Mode concludes that these movements can be accommodated without conflict with the existing landscaping and infrastructure. This directly addresses officers' concerns about access geometry and potential encroachment onto planted areas.

9.106 Pedestrian access would connect the existing Longwalk Road footways with entrances, parking and internal routes. An additional pedestrian connection is identified towards Bennetsfield Road. Demarcated crossings, dropped kerbs, tactile paving and step-free connections form part of the proposed approach. Cyclists would access from Longwalk Road and connect to the on-site facilities. These arrangements support DMT 5 and the Healthy Streets objectives of T2.

Car and cycle parking

9.107 The proposed parking provision is summarised below. Accessible, electric-vehicle and car-sharing allocations form part of the 88-space total.

Provision	Proposed arrangement
Car parking	88 spaces: 47 associated with Unit 100 and 41 with Unit 200.
Accessible parking	Six Blue Badge spaces, three per unit.
Electric-vehicle charging	26 charging spaces, including the six accessible spaces.
Car sharing	Five dedicated spaces: two for Unit 100 and three for Unit 200.
Cycle parking	68 spaces in secure, sheltered facilities.
Supporting cycle facilities	Showers, changing facilities and lockers identified within the retained northern amenity building.

9.108 The 88 spaces replace approximately 380 existing spaces, a reduction of 292. Mode's B8 parking-accumulation assessment forecasts a maximum demand of approximately 80 vehicles, providing an evidence-based justification for the proposed supply. London Plan T6.2(C) allows industrial parking to reflect lower employment densities and differing trip characteristics. The justification should also demonstrate suitability across the flexible uses sought.

9.109 The Car Parking Management Plan assigns responsibilities to occupiers, protects accessible and designated spaces, and provides for monitoring and corrective action. Parking would not be permitted within access, servicing or emergency routes. Existing estate restrictions support this approach, while the on-site supply and management measures are intended to avoid reliance on surrounding roads for overspill.

9.110 The proposed cycle provision exceeds the London Plan's B2/B8 standards when assessed against the overall floorspace. Cycle stores are located within secure and covered stores, in easily accessible location. The proposals also include the refurbishment of the existing amenity building to the north of unit 100 which will be used as showers and locker facilities, for cyclists.

Existing HGV activity and forecast movements

9.111 At the pre-application stage officers identified concern over the frequency and character of HGV movements, and their implications for the RPG and the tranquillity of the site. Mode's transport survey demonstrates that HGV activity already forms part of the operational environment of Stockley Park. The HSTA records five-day-average

daily flows of approximately 372 HGV movements on Bennetsfield Road and 177 on Longwalk Road over 24 hours. It is clear therefore that Stockley Park already accommodates HGV movements within the Park. The proposals would therefore increase an existing category of traffic. The appropriate assessment concerns the additional activity, its timing, routing and effects.

9.112 Mode's peak-hour comparison illustrates the relationship between existing activity and the scheme:

Period	Existing Bennetsfield Road HGV movements	Existing Longwalk Road HGV movements	Additional scheme HGV movements
08:00–09:00	24	13	6
17:00–18:00	22	10	6

9.113 Mode also distinguishes between vehicle categories. Its selected TRICS data comprise approximately 32% OGV1 and 68% OGV2 movements. OGV2 includes a range of larger goods vehicles and should not be equated exclusively with 16.5-metre articulated vehicles. The tracking assessment tests that larger vehicle to demonstrate geometric capacity.

Impact on registered landscape and tranquillity

9.114 Stockley Park's landscape is experienced within an active commercial estate containing roads, buses, servicing and other vehicle movements. Its amenity and heritage significance remain important within that operational context. The proposed servicing must therefore be assessed against the actual environment and the additional effects expected along the approach route and around the yards.

9.115 The site's entrance location materially limits the geographical extent of those effects. Dedicated rear service yards, driver instructions and estate-entry management would help contain loading and manoeuvring within the development and reduce unnecessary circulation. These arrangements support the direct-routing objective of DMT 7 and the environmental requirements of E3.

9.116 The Council's concerns regarding tranquillity must be considered against the established operational environment. Stockley Park combines a carefully designed landscape with an active commercial estate. Its landscaped character and perceived tranquillity already coexist with regular movements by cars, buses, servicing vehicles and HGVs. Tranquillity in this context is therefore compatible with a functioning transport network and periodic large-vehicle activity.

9.117 Mode's surveys provide quantitative evidence of that relationship. The HSTA records approximately 372 daily HGV movements on Bennetsfield Road and 177 on Longwalk Road, measured separately over 24 hours. These demonstrate that larger goods vehicles are an established feature of the roads adjoining the application site. The existing landscape continues to be experienced and appreciated within that environment.

9.118 The proposals would increase the frequency of an existing category of movement. They would not introduce HGV activity into an environment presently characterised by its absence. The proposals also concentrate loading and manoeuvring within dedicated rear service yards. Driver routing information, coordinated arrivals, restrictions on waiting on estate roads and measures to minimise unnecessary idling and servicing noise would help contain operational effects. These arrangements address the aspects of servicing most capable of causing avoidable disturbance, alongside the frequency of vehicles passing along the approach roads.

9.119 The Applicant consequently considers that the established coexistence of landscape amenity and large-vehicle activity provides substantive support for the compatibility of the proposed use. The additional movements must be assessed, but their presence does not itself demonstrate a fundamental change in the park's character or loss of tranquillity. Read alongside the noise and heritage evidence, the existing traffic baseline, limited routing and proposed management measures support the conclusion that servicing can be accommodated while sustaining the characteristic experience of this part of Stockley Park.

9.120 The experience of tranquillity must also be considered in the context of substantial office vacancy. Bray Fox Smith reports approximately 49% office vacancy at Stockley Park at the report date. Reduced occupation is likely to suppress activity and vehicle movements, meaning that present conditions may reflect underoccupation as well as the qualities of the designed landscape. Both application-site buildings are vacant, and their return to productive occupation would be expected to generate additional activity under either office or alternative employment use. A comparison solely with their current inactivity would therefore provide an incomplete basis for assessing the proposals.

9.121 Prolonged vacancy also presents a challenge to the sustainable management of the estate. Ownership and estate-maintenance liabilities continue without occupational income, potentially placing pressure on the financial arrangements supporting upkeep of the RPG. The proposals offer a commercially supported route to renewed occupation and an improved basis for meeting those continuing obligations. Their contribution to the park's future should therefore be considered alongside the additional activity they would generate.

9.122 The Applicant considers that the benefits of securing productive employment use, delivering the proposed landscape enhancements and supporting continuing stewardship outweigh the limited adverse effects identified, with any heritage harm afforded the considerable importance and weight required by policy. This judgment is supported by the established presence of HGVs, the short servicing route from the estate entrance and the proposed operational controls. It recognises that the park's conservation depends on managing a functioning commercial landscape whose amenity can coexist with appropriately accommodated economic activity.

9.123 This approach addresses the amenity objectives of Local Plan Policies DMT 2 and DMT 7, the environmental quality of the registered landscape under DMHB 8, and the management of servicing effects under London Plan Policy T7 and NPPF Policy E3.

Transport conclusion

9.124 The Applicant considers that the access, servicing and parking strategy provides a credible basis for accommodating the proposed employment uses. Existing HGV activity, the short connection to the estate entrance, dedicated service yards and managed deliveries support the case under DMT 1, DMT 2 and DMT 7, London Plan T4 and T7, and NPPF TR4, TR6 and E3.

Sustainability, Energy and the Circular Economy

9.125 Local Plan Part 1 Policy EM1 requires climate-change mitigation and adaptation to inform development. Policy BE1(10) addresses carbon reduction and sustainable construction, while EM11 requires waste management throughout the development's life, following the waste hierarchy. Part 2 Policies DMEI 2 and DMEI 3 address carbon emissions and decentralised energy. These policies establish the basis for considering operational performance alongside construction impacts and resource efficiency.

9.126 London Plan Policy SI 2 requires major development to achieve net-zero regulated operational carbon through the energy hierarchy, including at least 35% improvement beyond Building Regulations and 15% through energy efficiency for non-residential development. Policies SI 4, SI 5 and SI 7 address overheating, water efficiency and resource conservation. NPPF CC2 and CC3 provide corresponding objectives for emissions reduction, reuse of structures and materials, and adaptation to climate change.

Energy efficiency and low-carbon energy

9.127 Chord Consult's Energy and Overheating Assessment sets out an all-electric strategy combining efficient building fabric, mechanical systems, controls, lighting, heat-pump technology and roof-mounted photovoltaic panels. The approach follows the energy

hierarchy by reducing demand before incorporating low-carbon systems and renewable generation.

9.128 At the “Be Lean” stage, the assessment identifies fabric improvements, daylighting, efficient lighting, heat recovery and smart controls. It reports an approximately 22% reduction in energy demand against its selected baseline.

9.129 At the “Be Clean” stage, Chord identifies no existing or proposed heat network from which the development can currently benefit. The proposed heat-pump strategy therefore provides the identified route to low-carbon heating and cooling. Solar panels on both buildings contribute at the “Be Green” stage, reducing reliance on imported electricity.

9.130 The assessment reports an overall regulated carbon reduction of approximately 37% against the Target Emission Rate. This supports the proposed approach to the minimum on-site reduction required by SI 2. Residual regulated emissions would be addressed through the applicable carbon-offset arrangements, with the contribution calculated and agreed with the Council.

9.131 SRE’s TM54 assessment additionally examines anticipated operational energy use, including loads extending beyond the regulated-carbon calculation. Its central scenario reports approximately 24.29 kWh/sq m/year before photovoltaic generation and 13.56 kWh/sq m/year after allowing for that generation. These are modelled outcomes dependent on the stated occupation and servicing assumptions. They provide a basis for design refinement, commissioning and monitoring under the “Be Seen” stage.

Overheating and climate resilience

9.132 Chord’s assessment considers thermal comfort and overheating with reference to TM52 and BREEAM Hea 04. It reports that the assessed design falls within the relevant parameters, incorporating consideration of solar gains, ventilation and cooling of office accommodation. This supports the heat-risk objectives of SI 4 and NPPF CC3.

BREEAM and water efficiency

9.133 SRE’s Sustainability Statement and accompanying pre-assessment identify a target BREEAM UK New Construction Version 7 rating of Excellent, with a current targeted score of 84.02%. The assessment is registered under the Industrial Unit - Logistics, Shell and Core scheme, reflecting the proposed scope of the works. The target is supported by identified credits across the relevant assessment categories and would be verified through the certification process. Water efficiency is addressed through the specification of efficient sanitaryware and flow controls, supported by the targeted Wat

01 credits. The water calculation should separately demonstrate the requirement of London Plan Policy SI 5(C)(2), with the agreed performance secured through certification and verification requirements.

Whole-life carbon and the justification for redevelopment

9.134 SRE's Whole Life-Cycle Carbon Assessment examines the development's carbon impacts over a 60-year study period, encompassing material production, construction, maintenance, replacement, operational energy and water use, and end-of-life processes. This provides a broader assessment of environmental performance than operational energy alone and supports the resource-efficiency objectives of Local Plan Policies EM1, BE1 and EM11, London Plan Policies SI 2 and SI 7, and NPPF Policy CC2.

9.135 The assessment reports upfront embodied carbon of approximately 357 $kgCO_2e$/sq m and life-cycle embodied carbon of approximately 498 $kgCO_2e$/sq m. Including operational energy and water, the reported whole-life carbon impact is approximately 951 $kgCO_2e$/sq m. These figures distinguish the emissions associated with constructing and maintaining the buildings from those arising during occupation, allowing the principal opportunities for reduction to be addressed through the relevant design decisions.

9.136 The Applicant considers that the submitted assessment establishes a substantive basis for managing the development's carbon impacts throughout its life. Its findings support the proposed approach to efficient construction, operational performance and adaptability.

Circular economy and waste management

9.137 Local Plan EM11 and London Plan SI 7 support waste prevention, retention of material value and management towards the upper end of the waste hierarchy. SI 7 identifies targets of 95% reuse, recycling or recovery for construction and demolition waste and 95% beneficial use of excavation waste. These are distinct material streams and should be addressed separately.

9.138 The proposed independently occupiable buildings and flexible employment accommodation provide opportunities for adaptation to different occupiers over time. Durable materials, maintainable components and adaptable internal arrangements can extend useful life and reduce future replacement. The retained northern amenity building also forms part of the approach to retaining existing assets where compatible with the scheme.

9.139 Mode Transport Planning's Outline Construction Logistics Plan identifies opportunities for coordinated procurement, consolidated deliveries and reuse of suitable materials

generated on site. Contractor-stage arrangements should translate these opportunities into measurable practices, with records of material quantities, destinations and recovery outcomes. Operational waste storage and collection should similarly support segregation and recycling throughout occupation.

Conclusion on Energy and Sustainability

9.140 The proposals incorporate a positive combination of efficient building design, all-electric services, renewable generation, climate-resilience measures and adaptable employment accommodation. The energy, overheating and whole-life carbon assessments provide a basis for demonstrating the objectives of EM1, BE1, EM11, DMEI 2 and the relevant London Plan policies.

Environmental Consideration

Noise and vibration

9.141 Local Plan Policy EM8 requires noise impacts to be adequately controlled and mitigated. London Plan Policies D13 and D14 address compatibility with existing activities, avoidance of significant adverse effects and the management of the acoustic environment, including spaces of relative tranquillity. NPPF Policies P3 and P4 require development to be appropriate to its location and integrated effectively with surrounding activities. Policy E3 additionally requires acceptable environmental effects from freight and logistics operations, particularly where night-time activity is proposed.

9.142 Trium Environmental Consulting's Noise and Vibration Impact Assessment is informed by monitoring undertaken between 29 July and 5 August 2026. It considers vehicle movements, loading and unloading, reversing alarms, industrial noise breakout and future building-services plant. Receptors include the Travelodge hotel, offices at 1 and 3 Roundwood Avenue and 3 Longwalk Road, and commercial accommodation at 10 Iron Bridge Road North. The assessment therefore directly addresses compatibility with retained employment occupiers.

9.143 Trium predicts a low operational noise impact at the hotel during both daytime and night-time periods. Its separate assessment of maximum night-time events indicates a low likelihood of sleep disturbance under the assessed conditions. At neighbouring commercial premises, predicted internal levels fall below the BS 8233 guideline range for offices where work requiring concentration is undertaken. Trium consequently concludes that significant adverse operational noise effects are not expected.

9.144 Future building-services plant would be controlled through cumulative noise limits, with Trium proposing a criterion of 5 dB below representative background levels at the relevant sensitive façade. Detailed equipment selection and any acoustic treatment

should demonstrate compliance before operation. Construction noise and vibration would be managed through appropriate working methods and Best Practicable Means. Together, these measures provide a positive basis for satisfying EM8 and D14, subject to the final activities remaining within the assessment assumptions. Outdoor tranquillity is considered separately alongside the transport and heritage evidence.

Air quality

9.145 Local Plan Policies EM8 and DMEI 14 require protection of sensitive receptors, air-quality neutrality and measures contributing towards air-quality improvement. London Plan Policy SI 1 addresses emissions, exposure and air-quality neutrality. NPPF P3 requires consideration of pollution effects, including cumulative effects and the implications of development within an Air Quality Management Area.

9.146 Trium Environmental Consulting's Air Quality Assessment addresses demolition and construction dust, construction-vehicle emissions and operational traffic. Dispersion modelling predicts negligible effects on nitrogen dioxide, PM10 and PM2.5 concentrations at the existing human receptors assessed. Trium concludes that the operational effects would be not significant, providing technical support for the compatibility of the development and its associated traffic with surrounding uses.

9.147 Trium also concludes that the proposals are air quality neutral, applying the Mayor's guidance concerning industrial servicing movements, the comparison with office occupation and the proposed absence of new combustion plant. This conclusion is distinct from the dispersion modelling, which assesses effects on local pollutant concentrations. The proposed all-electric services strategy avoids routine combustion emissions, while electric-vehicle charging, travel planning and management of unnecessary idling support emissions control.

9.148 During demolition and construction, dust suppression and appropriate site-management practices would control potential nuisance and exposure. With the identified measures, Trium predicts negligible and not significant residual effects. These findings demonstrate compliance with DMEI 14 and SI 1.

9.149 Policy DMEI 1 has informed consideration of the development's approach to urban greening. Living roofs and walls are not proposed. The roof and façade design must accommodate the operational requirements of the industrial buildings, their environmental services and maintenance access, while delivering the architectural response developed through pre-application engagement. The Applicant considers that greening is more appropriately concentrated within the Site's established landscape framework, where it can reinforce the character and significance of the Registered Park and Garden.

9.150 The proposals therefore prioritise retention of the mature landscape structure, including the lime-tree necklace and boundary hedging, alongside additional trees, enhanced planting and a landscaped central avenue. Approximately 6,200 sq m of retained and proposed soft landscaping is identified, compared with approximately 5,800 sq m existing, with an Urban Greening Factor of 0.32. These measures provide a substantial landscape-led response to the policy's environmental objectives.

External lighting

9.151 NPPF P3 requires adverse effects from artificial light on amenity and nature conservation to be limited. Local Plan Policies DMEI 7 and DMHB 8 are also relevant to protecting ecological interests and the environmental quality of the Registered Park and Garden. The lighting design must therefore reconcile safe operation with the sensitivity of surrounding buildings, landscape spaces and habitats.

9.152 Chord Consult's External Lighting Report establishes an approach to illuminating entrances, pedestrian routes, parking and servicing areas while limiting unnecessary spill. It includes controlled light distribution and automatic controls, with provision to switch off non-essential lighting between 23:00 and 07:00, subject to safety and security requirements. Lighting associated with night-time servicing must be considered alongside the proposed operating arrangements.

Ground conditions and contamination

9.153 Local Plan Policies EM8, DMEI 11 and DMEI 12 require development to address contamination risks and protect groundwater. NPPF Policy P2 similarly requires land to be suitable for its proposed use, taking account of ground conditions and any necessary remedial measures. The relevant consideration is whether identified risks can be satisfactorily managed through investigation, design and remediation.

9.154 Evolve Geo-Environmental's Preliminary Risk Assessment provides an established evidence base for that process. It reviews the site's historical uses, previous ground investigations and remediation undertaken during the development of Stockley Park. It identifies matters requiring consideration during redevelopment, including made ground, potential ground-gas migration, groundwater conditions and the possible presence of contaminated materials within areas affected by construction.

9.155 Further targeted investigation and monitoring would confirm conditions within the proposed construction areas and establish the protection measures required for the commercial end use. Depending on the findings, these could include ground-gas protection within buildings, controlled handling and disposal of excavated materials, and suitable cover in landscaped areas. The results would also inform foundation design, drainage and service installation, ensuring that construction does not create new pathways for contamination or compromise existing protection measures.

9.156 The assessment therefore identifies a practical process for establishing that the site is suitable for redevelopment. Subject to sufficient investigation demonstrating the acceptability of the scheme, appropriately staged planning conditions can secure the detailed remediation strategy, its implementation and verification before occupation. This would provide an enforceable means of addressing the identified risks and satisfying the objectives of DMEI 11, DMEI 12 and NPPF P2.

Flood risk and drainage

9.157 Local Plan Policy EM6 and Policies DMEI 9 and DMEI 10 address flood risk and water management. London Plan SI 12 and SI 13 require appropriate flood-risk management and sustainable drainage. NPPF F4 requires proportionate site-specific assessment, while F8 addresses runoff management, drainage design and maintenance.

9.158 Howard Ward Associates' Flood Risk Assessment and SuDS Statement identifies the site within Flood Zone 1 and assesses the drainage requirements of the redevelopment. Infiltration is discounted owing to ground conditions. The proposed approach therefore uses attenuation and restricted discharge to manage runoff while avoiding reliance on infiltration through made ground.

9.159 Four attenuation tanks are proposed, with two serving each unit. Discharge would be restricted to approximately 3.7 litres per second from Unit 100 and 3.6 litres per second from Unit 200. The combined rate of 7.3 litres per second corresponds to the report's calculated greenfield QBAR rate. The strategy provides for the 1-in-100-year rainfall event with a 40% climate-change allowance, supporting the objectives of controlled runoff and resilience.

9.160 The strategy offers a positive response to drainage policy, subject to confirmation of detailed design and delivery. The receiving private drainage system's capacity, discharge rights, water-quality treatment and maintenance responsibilities require coordination with estate management and the relevant authorities.

Ecology and biodiversity

9.161 Local Plan Policy EM7 and Policy DMEI 7 seek to protect ecological interests and secure appropriate enhancement. London Plan G6 addresses biodiversity, while NPPF N2 requires significant harm to be avoided, mitigated or, as a last resort, compensated. The statutory requirement for at least 10% biodiversity net gain applies alongside the assessment of protected species and designated ecological sites.

9.162 Trium Environmental Consulting's biodiversity appraisal is informed by MKA Ecology's Preliminary Ecological Appraisal. The evidence considers existing habitats and the implications of the landscape proposals. Retention of established vegetation,

additional planting and habitat features provide opportunities to support ecological interest within the designed landscape. Species safeguards, construction practices and lighting should be coordinated with the ecological recommendations and the nearby Stockley Park Lakes and Meadows nature conservation site.

9.163 The biodiversity strategy has been developed alongside the heritage-led landscape approach. During pre-application discussions, the Applicant explored measures intended to accommodate the required 10% gain within the application site. The Council's feedback favoured greater retention of the established landscape and questioned interventions that would depart from the Registered Park and Garden's characteristic planting and design. The subsequent approach therefore prioritises retention, targeted repair and reinforcement of the existing landscape, avoiding unnecessary intervention.

9.164 This restrained approach limits the opportunities for additional habitat creation and enhancement within the application boundary. The submitted metric identifies an on-site habitat-unit loss of approximately 14.12%, arising from the development's habitat losses and the extent of enhancement proposed. The strategy seeks to reconcile the statutory biodiversity requirement with conservation of the registered landscape, recognising that more extensive ecological intervention within the site would not produce a better heritage outcome.

9.165 The Applicant therefore intends to investigate additional habitat provision elsewhere within Stockley Park, where suitable opportunities could deliver ecological gains compatible with the wider landscape. Any such provision would need to demonstrate additionality, satisfy the statutory metric's trading rules and be secured through the required registration, allocation and long-term management arrangements. Alternatively, suitable off-site biodiversity units could be purchased, with statutory biodiversity credits used as a last resort where the requirement cannot be met through on-site or off-site gains.

9.166 The final metric and delivery arrangements will establish how the development achieves at least 10% biodiversity net gain. This approach responds to the pre-application emphasis on landscape retention while maintaining the requirement to deliver the full statutory gain. The chosen solution must be substantiated and secured through the applicable biodiversity gain arrangements, with the Biodiversity Gain Plan approved before commencement.

Conclusion of environmental considerations

9.167 The assessments provide positive technical support for the proposed employment use, particularly in relation to operational noise and air quality. They also identify practical measures to manage lighting, ground conditions, drainage and construction

effects. The Applicant considers that these matters can be addressed through the coordinated design and proportionate controls, subject to substantiation of the outstanding technical arrangements and the biodiversity gain solution.

9.168 Appropriate conditions and, where necessary, obligations should secure implementation, verification and continuing management. This would ensure that the environmental performance assessed at application stage is maintained through construction, occupation and future changes in occupier.

Planning Balance

9.169 Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires the application to be determined in accordance with the development plan unless material considerations indicate otherwise. The assessment must consider the plan as a whole, identify any policy conflict and determine whether the material considerations justify approval. The Applicant's case is that when viewed as a whole, the development is in accordance with the development plan.

9.170 The Site's location within the Grade II Registered Park and Garden is central to this judgment. The conservation of its significance attracts substantial weight under NPPF HE6(1), and any harm must be afforded considerable importance and weight under HE6(3). The balance below expressly recognises those requirements. The economic case does not remove the need to assess and justify the effects on the registered landscape.

Economic and regeneration benefits

9.171 The Proposals would provide modern, adaptable employment accommodation in an established commercial location with access to the strategic road network. The two independently occupiable units offer flexibility for different businesses and changing requirements over time. These are substantive economic benefits, attracting substantial weight under NPPF E2(1)(a), which supports commercial development enabling businesses to invest, expand and adapt. NPPF economic policies.

9.172 The Proposals would generate approximately 115–296 FTE jobs. This is expected to generate £206,480 to £531,280 in annual local expenditure and £4.1 million to £10.6 million in annual GVA.

9.173 Construction would provide a further temporary economic contribution. The proposals are estimated to deliver approximately 83 direct construction FTE jobs over an indicative 17 month programme, as well as an additional 27 indirect and induced jobs per year.

9.174 Bringing the vacant site into productive use also advances the effective use of previously developed employment land. The benefit arises from renewed occupation and delivery of accommodation responding to current requirements, rather than an increase in total floorspace. Substantial weight attaches to making better use of vacant and underutilised business sites under NPPF L2(1)(b). This consideration reinforces the economic case, with overlapping benefits recognised rather than counted twice.

9.175 The Council's Growth Plan provides further support for considering the proposals' contribution to employment renewal and investment. Returning vacant plots to productive use, providing adaptable business accommodation and securing employment and training measures would advance relevant aspects of that strategy. This alignment adds weight to the economic case alongside the specific market and viability evidence.

9.176 The Applicant recognises that the Growth Plan's ambitions encompass innovation, local opportunity and quality of place. The scheme's contribution must therefore be assessed through its actual accommodation, employment measures and landscape response. Its strategic alignment is a supporting material consideration; the office-retention policies and the conservation of the Registered Park and Garden remain expressly addressed in the balance.

Design evolution and landscape benefits

9.177 The design has been materially shaped by engagement with Hillingdon and Historic England. Reduced footprints and internal heights, revised roofs, greater landscape retention and more detailed pavilion references demonstrate a substantive response to the concerns raised. These changes strengthen the contextual design case while maintaining accommodation intended to be fit for industrial occupation.

9.178 Retaining the two-plot arrangement and central route helps sustain the spatial organisation of this part of Stockley Park. The architectural response uses a restrained palette, horizontal glazing, expressed roof profiles and façade articulation to establish a relationship with the Phase I buildings. These measures reduce the effects of redevelopment and support the design objectives of BE1, DMHB 11 and London Plan D3.

9.179 The landscape proposals also offer identifiable opportunities for enhancement. Reinforcement of the central avenue and hedging, renewal of the north-eastern amenity space and planting informed by the original landscape structure would support the legibility and continuing use of the designed landscape. Positive weight attaches to demonstrable improvements over existing conditions, subject to their implementation and long-term management. Retention and screening required to

mitigate harm are accounted for as mitigation and are not counted again as additional benefits.

9.180 Productive occupation would improve the financial basis from which the owner can meet continuing estate liabilities, including charges supporting maintenance of the wider park. This provides a supporting link between commercially sustainable occupation and landscape stewardship. The obligation already exists, and the proposals do not establish an additional secured contribution unless one is expressly provided. Nor is deterioration of the wider RPG assumed to be inevitable without this development.

Heritage effects and the heritage balance

9.181 The Proposals would replace and existing building, introduce greater height and mass and remove areas of existing planting. These changes require proper weight notwithstanding the buildings' absence from the statutory and local lists. Their contribution to the registered landscape must be assessed on its merits.

9.182 Montagu Evans' HTVIA identifies low-level harm from landscape removal and concludes that the proposed enhancements would result in no overall harm to the RPG or nearby locally listed buildings.

9.183 The Applicant considers that the retained landscape framework, separation of buildings and contextual architectural treatment support the conclusion that the proposals would not seriously affect a key element of the RPG's significance. On that basis, the substantial-harm tests would not be engaged. Any residual harm nevertheless remains a matter of considerable importance and weight, to be assessed under HE6(4).

9.184 In that balance, the Applicant considers that the substantial economic and effective-land-use benefits, together with the evidenced landscape enhancements, outweigh the limited harm identified. This conclusion takes account of the Site's prominent position and the survival interest of the original ensemble. It rests on the particular design, commercial evidence and delivery benefits of this application.

9.185 Where residual harm is found, the corresponding tension with DMHB 8(C) must also be recognised. Its normal resistance to detrimental effects is a material consideration. The Applicant considers that the identified benefits and measures to conserve the principal landscape relationships provide a persuasive justification for approval notwithstanding that tension.

Transport, amenity and environmental performance

9.186 Mode's evidence demonstrates that HGV movements already form part of the commercial environment. The proposals would add activity along a short route from

the estate entrance, with dedicated rear service yards, vehicle tracking and management measures addressing routing, waiting and servicing. Existing activity provides context rather than an automatic justification for additional movements. The noise and heritage assessments demonstrates that the resulting effects can be accommodated.

9.187 Trium's assessments provide positive evidence concerning neighbouring occupiers: low operational noise impact is predicted at the hotel, suitable internal conditions at neighbouring offices and negligible operational air-quality effects at the receptors assessed. These findings support compatibility with surrounding uses.

9.188 The proposed energy strategy, renewable generation and landscape renewal offer opportunities for environmental improvement.

Conclusion

9.189 Taken as a whole, the proposals offer a credible opportunity to return vacant employment land to productive use, accommodate evidenced business requirements and generate meaningful economic activity. The design has evolved to conserve the principal landscape structure and respond to the Park's architectural character. These benefits must be weighed against the loss of office capacity, departure from the original ensemble, increased scale and additional servicing activity.

9.190 The Applicant's case is that when viewed as a whole, the development is in accordance with the Development Plan. The Applicant's position is that the balance falls positively in favour of permission under section 38(6). The development would provide a commercially supported employment future for the Site while delivering a coordinated response to its sensitive landscape setting.

10

Draft heads of terms

10 Draft heads of terms

10.1 The Applicant anticipates entering into a planning obligation under section 106 of the Town and Country Planning Act 1990 where necessary to secure the measures required to make the development acceptable. The agreement would be informed by Local Plan Policy DMCI 7, the Council's Planning Obligations SPD and the relevant development-plan policies.

10.2 Any obligation relied upon in granting permission must be necessary to make the development acceptable in planning terms, directly related to the development, and fairly and reasonably related in scale and kind. The following heads of terms provide an indicative basis for discussion with the Council. Their scope, financial amounts and implementation triggers remain subject to agreement.

Matter	Indicative obligation	Proposed timing
Carbon offsetting	Secure whether a contribution is required to address residual regulated carbon emissions following the agreed on-site reductions. The amount would be calculated from the final approved energy assessment, using the applicable methodology and rate.	Payment before occupation of the relevant unit.
Employment, skills and training	Agree an Employment and Skills Plan covering appropriate construction and operational training, apprenticeships, recruitment opportunities and liaison with the Council. Any financial contribution would reflect the agreed delivery arrangements and applicable policy requirements.	Plan approved before construction; measures implemented during the relevant construction and occupation stages.

Matter	Indicative obligation	Proposed timing
Travel Plan	Secure implementation of the approved Travel Plan, appointment of a coordinator, monitoring, reporting and proportionate corrective measures. Any monitoring contribution or performance security would require specific justification and agreement.	Coordinator and implementation arrangements established before first occupation; monitoring thereafter for an agreed period.
Off-site biodiversity provision	Provision within or outside of Stockley Park.	Legal security, registration and allocation arrangements completed as required to support approval of the Biodiversity Gain Plan before commencement.
Site-specific transport mitigation	Secure any identified off-site works or management measures necessary to address development impacts, including implementation responsibilities and access to relevant land. Any estate-road inspection and repair arrangements should be defined and supported by the parties responsible for delivery.	Relevant measures implemented before the activity generating the requirement begins; monitoring thereafter where necessary.
Living wall/roof	Secure whether a contribution is required to address Policy DMEI 1.	Payment before occupation of the relevant unit.

Financial and administrative provisions

10.3 The agreement would include appropriate provisions for indexation, payment notices, expenditure purposes, repayment of unspent contributions, enforcement and reasonable monitoring costs. Financial contributions should be tied to clearly identified requirements and should not duplicate provision funded through another mechanism. The Applicant would meet the Council's reasonable legal costs associated with completing the agreement, subject to agreed arrangements.

10.4 Any liability for the borough's Community Infrastructure Levy and Mayoral Community Infrastructure Levy would be assessed separately under the applicable charging schedules and regulations.

10.5 The final heads of terms would be agreed following completion of the technical assessments and consultation. The resulting obligations would secure the necessary mitigation and any additional commitments relied upon in the planning balance.

11

Conclusion

11 Conclusion

11.1 This Planning Statement supports the application for redevelopment of 1 and 2 Longwalk Road to provide approximately 11,006 sq m GIA of flexible employment accommodation within Classes E(g)(iii), B2 and B8, with ancillary offices, servicing, parking, landscaping and associated works. The proposals would return vacant commercial plots to productive use while retaining their contribution to Stockley Park's employment function.

11.2 The application responds to evidenced commercial circumstances. The prolonged vacancy and unsuccessful marketing, substantial office availability across the park and significant deficit identified in the tested refurbishment appraisal demonstrate the challenges facing continued office investment. The proposed accommodation responds to identified industrial demand within the Heathrow catchment and offers a credible route to renewed occupation, business investment and employment.

11.3 The scheme has evolved substantially through engagement with the London Borough of Hillingdon, Historic England and third party stakeholders. Reduced footprints and internal heights, revised roof profiles, greater landscape retention and detailed references to the Phase I pavilion architecture demonstrate a considered response to officer comments. The resulting design seeks to sustain the characteristic relationship between buildings and landscape while providing accommodation suited to contemporary industrial requirements.

11.4 The significance of the Grade II Registered Park and Garden has informed that process and is central to the planning balance. The proposals retain important landscape structure and provide opportunities for targeted renewal and enhancement. The Applicant recognises the potential effects on the heritage interest of the Park.

11.5 The supporting assessments provide a positive basis for accommodating the proposed use alongside surrounding occupiers. The Site's proximity to the estate entrance, dedicated servicing areas and operational management measures limit the extent of additional vehicle circulation. The noise and air-quality findings support compatibility with neighbouring uses, while the energy and landscape strategies provide opportunities to improve environmental performance. The identified technical requirements and biodiversity gain solution must be substantiated and secured through the final submission and appropriate controls.

11.6 The principal benefits of the proposals are:

- **Bringing vacant employment land back into productive use:** providing a credible route to renewed occupation in response to prolonged vacancy, challenging office-market conditions and the significant refurbishment deficit identified.
- **Meeting evidenced business requirements:** delivering approximately 11,006 sq m GIA of modern employment accommodation responding to industrial and logistics demand within the Heathrow catchment.
- **Supporting business investment and adaptability:** providing two independently occupiable units with flexible accommodation capable of serving different businesses and changing operational requirements.
- **Creating employment and economic activity:** the proposals could support approximately 115–296 FTE jobs. This is expected to generate £206,480 to £531,280 in annual local expenditure and £4.1 million to £10.6 million in annual GVA.
- **Supporting construction employment:** generating an estimated 83 direct construction FTE jobs over an indicative 17 month programme, as well as an additional 27 indirect and induced jobs per year.
- **Helping to meet the Council's Growth Plan:** supporting relevant objectives of the Council's Growth Plan through employment renewal and investment.
- **Delivering targeted landscape renewal:** reinforcing characteristic planting and improving the north-eastern amenity space through coordinated planting, seating and surface treatments, subject to the final specifications and management arrangements.
- **Supporting long-term stewardship:** establishing an income-producing use that improves the financial basis for meeting continuing estate liabilities, including charges supporting the upkeep of Stockley Park.
- **Providing modern environmental infrastructure:** incorporating an all-electric services strategy, heat pumps, photovoltaic generation and efficient building fabric, with performance secured through the final agreed specification.

11.7 The Applicant acknowledges the policy tensions associated with office loss and change within the registered landscape. These have been assessed expressly alongside the benefits of effective use of vacant land, modern employment provision, economic activity and landscape renewal. Substantial weight attaches to the evidenced economic and land-use benefits, which the Applicant considers outweigh the identified adverse effects and justify approval notwithstanding any conflict with individual development-plan policies.

11.8 Accordingly, subject to completion of the necessary planning obligations, the Applicant considers when viewed as a whole, the development is in accordance with the Development Plan. The Council is respectfully requested to approve the application, subject to appropriate conditions, to secure a productive employment future for the Site and the delivery of the assessed scheme.

A

Relevant planning policies

A Relevant planning policies

Hillingdon Local Plan: Part 1 — Strategic Policies (November 2012)

- E1 — Managing the Supply of Employment Land.
- E2 — Location of Employment Growth.
- BE1 — Built Environment.
- HE1 — Heritage.
- EM1 — Climate Change Adaptation and Mitigation.
- EM6 — Flood Risk Management.
- EM7 — Biodiversity and Geological Conservation.
- EM8 — Land, Water, Air and Noise.
- EM11 — Sustainable Waste Management.
- T1 — Accessible Local Destinations.

Hillingdon Local Plan: Part 2 — Development Management Policies (January 2020)

- DME 1 — Employment Uses on Designated Sites, particularly criteria C and D concerning acceptable employment uses within Locally Significant Employment Locations.
- DME 3 — Office Development, particularly criterion B concerning the loss of offices in preferred office-growth locations.
- DMHB 1 — Heritage Assets.
- DMHB 3 — Locally Listed Buildings.
- DMHB 8 — Registered Historic Parks, Gardens and Landscapes.
- DMHB 10 — High Buildings and Structures.
- DMHB 11 — Design of New Development.
- DMHB 12 — Streets and Public Realm.
- DMHB 14 — Trees and Landscaping.

- DMEI 2 — Reducing Carbon Emissions.
- DMEI 3 — Decentralised Energy.
- DMEI 7 — Biodiversity Protection and Enhancement.
- DMEI 9 — Management of Flood Risk.
- DMEI 10 — Water Management, Efficiency and Quality.
- DMEI 11 — Protection of Ground Water Resources.
- DMEI 12 — Development of Land Affected by Contamination.
- DMEI 14 — Air Quality.
- DMCI 7 — Planning Obligations and Community Infrastructure Levy.
- DMT 1 — Managing Transport Impacts.
- DMT 2 — Highways Impacts.
- DMT 4 — Public Transport.
- DMT 5 — Pedestrians and Cyclists.
- DMT 6 — Vehicle Parking.
- DMT 7 — Freight.

London Plan (March 2021)

- GG5 — Growing a Good Economy.
- E1 — Offices.
- E4 — Land for Industry, Logistics and Services to Support London's Economic Function.
- E7 — Industrial Intensification, Co-location and Substitution.
- D1 — London's Form, Character and Capacity for Growth.
- D3 — Optimising Site Capacity through the Design-led Approach.
- D4 — Delivering Good Design.
- D5 — Inclusive Design.
- D13 — Agent of Change.
- D14 — Noise.
- HC1 — Heritage Conservation and Growth.
- G1 — Green Infrastructure.
- G5 — Urban Greening.
- G6 — Biodiversity and Access to Nature.

- G7 — Trees and Woodlands.
- SI 1 — Improving Air Quality.
- SI 2 — Minimising Greenhouse Gas Emissions.
- SI 4 — Managing Heat Risk.
- SI 5 — Water Infrastructure.
- SI 7 — Reducing Waste and Supporting the Circular Economy.
- SI 12 — Flood Risk Management.
- SI 13 — Sustainable Drainage.
- T2 — Healthy Streets.
- T4 — Assessing and Mitigating Transport Impacts.
- T5 — Cycling, including the cycle-parking standards in Table 10.2.
- T6 — Car Parking.
- T6.2 — Office Parking, including the provisions concerning industrial parking.
- T6.5 — Non-residential Disabled Persons Parking.
- T7 — Deliveries, Servicing and Construction.

National Planning Policy Framework (August 2026)

- DM4 — Emerging development plan proposals: the weight attributable to emerging policies.
- E2 — Economic development: support for business investment, expansion and adaptation, including the weight attributable to economic benefits.
- E3 — Freight and logistics: accessibility, servicing, parking and environmental compatibility.
- L2 — Effective use of land: including the substantial weight attributable to making better use of vacant and underutilised business sites.
- DP3 — Design requirements: contextual design, built form, identity, movement, public space, climate and nature.
- DP4 — Design quality: consideration of design throughout the development process.
- TR3 — Sustainable accessibility: access to development by sustainable modes.
- TR4 — Access, servicing and parking: safe and suitable arrangements.
- TR6 — Transport assessment and mitigation: proportionate evidence, travel planning, highway safety and residual network impacts.

- CC2 — Climate-change mitigation: emissions reduction, resource efficiency, reuse and low-carbon energy.
- CC3 — Climate-change adaptation: resilience to climate impacts, including overheating and drainage.
- P2 — Ground conditions and contamination: suitability of land for its proposed use and management of identified risks.
- P3 — Pollution: effects on health, amenity and the environment, including noise, air quality and artificial light.
- P4 — Compatibility with existing activities: integration of development with neighbouring uses.
- F4 — Site-specific flood-risk assessment.
- F8 — Surface-water runoff and sustainable drainage.
- N2 — Biodiversity and natural features: protection, enhancement and the mitigation hierarchy.
- N3 — Trees: planting, retention, appropriate species selection and long-term maintenance.
- HE4 — Securing the conservation of heritage assets.
- HE5 — Assessing effects on heritage assets.
- HE6 — Proposals affecting designated heritage assets, including conservation weight, harm and public-benefit tests.

3-5 Duke Street
London W1U 3ED

info@daraplanning.com
daraplanning.com