



# HILLINGDON

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Date: 11<sup>th</sup> July 2025

Our Ref: 67702/APP/2025/1552

Dear Colin Sinclair

**Request for a Screening Opinion under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the demolition of two office buildings and MSCP and construction of four new buildings of up to 11 stories in height delivering up to 662 residential units.**

## **SITE: HYDE PARK HAYES, MILLINGTON ROAD**

I refer to your Screening Request submission which was received by the Local Planning Authority on 5<sup>th</sup> June 2025. I write to inform you that in the preliminary examination of the screening request (ref: 67702/APP/2025/1552), it was found that the development proposed comprises of "Schedule 2 development" as defined in the Town and Country Planning (Environmental Impact Assessment) Regulations 2017. Therefore, the Local Planning Authority is required to make a determination as to whether an Environmental Impact Assessment (EIA) is necessary.

In this context, a report on the need for an Environmental Impact Assessment in respect of this application has been considered under delegated powers and it has been concluded that an **Environmental Statement is not required**.

Yours sincerely,

Roz Johnson

Head of Development Management and Building Control

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**The Town and Country Planning  
(Environmental Impact Assessment) Regulations 2017 (as amended)**

<b>Regulations 2017, as amended</b> <b>SCREENING OPINION</b> Relating to Application No (where applicable):	67702/APP/2025/1552
Location:	HYDE PARK HAYES, MILLINGTON ROAD
Site area:	2.4 hectares
Description of development:	Request for a Screening Opinion under The Town and Country Planning (Environmental Impact Assessment) Regulations 2017 for the demolition of two office buildings and MSCP and construction of four new buildings of up to 11 stories in height delivering up to 662 residential units.

## **1. The Site and Surroundings**

The site is a large plot of land, measuring circa 2.4 hectares in area, and forms part of the wider Hyde Park Hayes (HPH) commercial estate. The wider estate comprises three large office buildings called Hyde Park Hayes 1 (HPH1), Hyde Park Hayes 2 (HPH2) and Hyde Park Hayes 5 (HPH5), and sit alongside a multi-storey car park (MSCP).

The HPH1 building does not form part of the development but has permission (ref. 67351/APP/2024/2746) to change the use of the building from offices to a mixed use, including an office at ground level and residential units above. The ground floor of this building is occupied by Apple on a short-term lease and gives the tenant the right of access to 62 parking spaces, located in the surface level car park next to HPH1 and the MSCP.

The Hyde Park Hayes 3 (HPH3) building and Hyde Park Hayes 4 (HPH4) plot do not form part of the site either and sit on the western edge of the Hyde Park Hayes site. HPH3 has been the subject of application reference 72360/APP/2021/1709 which granted Prior Approval in September 2021 for the change of use from offices to 113 flats. HPH4 has been the subject of application references 76655/APP/2021/3039 and 76655/APP/2023/779 and has been granted permission in April 2022 and June 2023 for the re-development of the site to provide a residential development comprising 131 units.

Residential properties are located to the north of the site along Keith Road, south along Dawley Road and west along Bourne Avenue, Waltham Avenue, and Guinness Close. The Yodel warehouse is also located to the north and has been the subject of two planning applications (refs. 27189/APP/2020/2181 and 27189/APP/2021/2782), granting permission

for 150 residential units and 376 no. Shared-Living units. The Premier Inn hotel is also located to the north-east of the site and has consent under application reference 78950/APP/2024/2084 for alterations to the hotel, resulting in an increase in hotel rooms from 150 to 159 and reduction in restaurant space.

The City Circle UK coach storage site, Selco Builders warehouse site and Hayes Asda Superstore is located to the east of the site. Further commercial uses are located to the south, including Nippon Express, Attewell Ltd and Geiger UK. Further outside of the Hyde Park Hayes site, a roundabout intersecting Dawley Road, North Hyde Road and Bourne Avenue is located to the west. Millington Road runs through the site, connecting the roundabout on the west to Station Road to the east. North Hyde Road also bounds the site to the north.

The Hyde Park Hayes site is an edge of centre location with urban and suburban characteristics, noting that Hayes Town Centre is designated circa 400m to the north-east of the application site. The site also sits just outside the Hayes Housing Zone.

According to the Council's GIS, the site is subject to potentially contaminated land. The site also forms part of the Council's declared Hillingdon Air Quality Management Area and Hayes Air Quality Focus Area, where air quality conditions exceed the EU annual mean limit value for nitrogen dioxide (NO<sub>2</sub>), have high human exposure and current planned measures are insufficient to resolve the poor air quality issues. Based on TfL's WebCAT planning tool, the site has a good Public Transport Accessibility Level (PTAL) rating of 4, abutting land to the east which has a PTAL rating of 5, benefitting from the improved transport connections at Hayes & Harlington Crossrail station located 500m to the East.

A Strategic Industrial Location is located circa 200m to the north of the site, alongside the designated Botwell: Thorn EMI Conservation Area, Old Vinyl Factory, Grade II Listed Enterprise House, Locally Listed 'His Master's Voice' building and Locally Listed Thorn/EMI Building.

## **2. The Proposed Development**

The scheme proposes to demolish two existing office buildings (HPH2 and HPH5), the multi-storey car park (MSCP) and the at-grade car parking space to facilitate the construction of 4 no. buildings measuring up to 11 stories in height, delivering up to 662 residential units and 282 car parking spaces (112 of which will be retained commercial spaces). The residential blocks vary in height and are sited on North Hyde Road (Block A) to the north and Millington Road to the south (Blocks B, C and D), arranged around HPH1 which has consent for a change of use from offices to 75 no. residential flats.

Construction works for new foundations and associated excavations will be required, and the excavation of a basement level is also proposed for part of the site. The existing HPH5 building has a basement level, which will be retained in the future Block C. A single-level

basement will be excavated within the footprint of the MSCP and will be part of the future Block D. Car parking space will be provided in the basements and under-podium levels of Block C and Block D.

The development proposes to deliver open space, public realm, new pedestrian links, and active frontages.

Vehicle access to the site is currently provided via Millington Road. The development will retain the current road access but proposes to narrow road lanes segregating vehicular and pedestrian movement. The development proposes cycle storage and works at the existing ground level where new landscaping finishes will be installed.

### **3. Reason for Screening Opinion**

Schedule 1 of the EIA Regulations sets out development types for which EIA is mandatory. Schedule 2 of the EIA Regulations sets out developments for which EIA may be required. Schedule 2 Paragraph 10(e) of the EIA Regulations relates to EIA development at airports.

The proposed development falls under Schedule 2 (10b) which relates to 'Urban development projects' where (ii) the development includes more than 150 dwellings.

Development falling within Schedule 2 should normally meet certain thresholds to trigger the need to screen whether EIA is applicable for development, and subsequent planning application requires an environmental statement.

EIA is only applicable for developments likely to have significant environmental effects. Some developments may be below the prescribed thresholds but still trigger the need for an EIA.

National Planning Practice Guidance states:

*“...projects listed in Schedule 2 which are located in, or partly in, a sensitive area also need to be screened, even if they are below the thresholds or do not meet the criteria.”*

The regulations assist with identifying sensitive sites, which are generally nationally important locations. The application site is located within the Hillingdon Council borough boundary within close proximity to Hayes Town Centre. The site is not within an environmentally 'sensitive area' as defined under Regulation 2(1) of the EIA Regulations.

The determination of significance is a subjective process, but in the context of EIA, it is crucial to consider the scale of a development's impact and the sensitivity of the environmental receptor that is impacted. For instance, a small-scale effect on a highly sensitive receptor or a more considerable impact on a less sensitive receptor may result in

a determination of likely significant environmental effects. Only impacts with more than local importance will likely give rise to significant environmental effects.

### **3.1 Assessment of the Environmental Effects (Consideration Against EIA Regulations Schedule 3 Selection Criteria)**

Schedule 3 of the EIA Regulations sets out the 'selection criteria' that must be taken into account in determining whether or not a Schedule 2 development is likely to give rise to significant impacts on the environment and, therefore, whether or not it would require an EIA. These are (1) Characteristics of Development, (2) Location of Development, and (3) Types and Characteristics of the Potential Impact.

#### ***(1) Characteristics of Development:***

The characteristics of development must be considered with particular regard to:-

- (a) the size and design of the whole development;*
- (b) cumulation with other existing development and/or approved development;*
- (c) the use of natural resources, in particular land, soil, water and biodiversity;*
- (d) the production of waste;*
- (e) pollution and nuisances;*
- (f) the risk of major accidents and/or disasters relevant to the development concerned, including those caused by climate change, in accordance with scientific knowledge;*
- (g) the risks to human health (for example, due to water contamination or air pollution)*

The development, whilst tall in scale would be located within the setting of a range of other tall buildings (whether that be existing or with planning permission secured) used for residential purposes that are generally similar appearance. The maximum height of the development, at 11 stories would exceed the height of existing or approved development within the immediate area but is sited such that the impact in design and visual terms is unlikely to be significant beyond the local context and would not appear particularly unusual or incongruous within the context of the surrounding area. It would be required that any planning application is accompanied by a Townscape and Visual Impact Assessment, a Daylight and Sunlight Report and a Microclimate Report, which would be adequate in assessing the extent to which the development would impact on key public views and important receptors, as well as daylight, sunlight, overshadowing and microclimate. It is considered that the development, in combination with other neighbouring urban development projects, would be unlikely to have environmental significance beyond a localised impact.

The Applicant would be required to submit a Transport Assessment with the full planning application. This assessment must demonstrate the capacity for the anticipated increase in movements to and from the site by all modes on the existing highway network accounting for existing and consented development in the surrounding area. A Travel Plan would be

required in support of a planning application to demonstrate how the impact of trips to and from the site will be managed. It is considered that the development, in combination with other neighbouring urban development projects, would be unlikely to have environmental significance beyond a localised impact.

There would not be unusual use of natural resources in the construction and future operation of the site that is not already associated with typical developments of this nature. This criterion is considered not applicable to the proposed development.

There would not be unusual production of waste arising from the completed development. This proposed development is not considered to give rise to any adverse effects concerning waste. A Waste Management Plan would be required in support of any planning application to ensure the appropriate disposal of waste, management and recycling during the construction and operational phases of the development. Waste during the construction process may also be controlled through the preparation of a Construction Management Plan that may be secured by planning condition.

The site is subject to noise generating uses including the City Circle UK coach storage site, Selco Builders warehouse site and Hayes Asda Superstore located to the east. Further commercial uses are located to the south, including Nippon Express, Attewell Ltd and Geiger UK. The development itself would generate noise during construction but is unlikely to generate significant noise impacts once completed and operational/occupied. The development would, however, be required to mitigate against impacts generated by neighbouring commercial uses on the proposed residential units. It is considered that noise impacts are unlikely to be significant and can be appropriately assessed through a noise impact assessment which would include any appropriate mitigation measures, the implementation of which can be secured by planning condition.

The site forms part of the Council's declared Hillingdon Air Quality Management Area and Hayes Air Quality Focus Area, where air quality conditions exceed the EU annual mean limit value for nitrogen dioxide (NO<sub>2</sub>), have high human exposure and current planned measures are insufficient to resolve the poor air quality issues. As such, the full application would need to be supported by an Air Quality Assessment accounting for the nature of the use and associated traffic generation. This is considered sufficient to assess the scope of impact in terms of air quality and submission of an EIA would not be required to address this matter.

Similarly, the full application would need to be supported by an Energy and Sustainability Assessment accounting for the generation of greenhouse gas (GHG) emissions. This is considered sufficient to assess the scope of impact in terms of GHG emissions and submission of an EIA would not be required to address this matter.

The risk of major accidents and/or disasters in relation to the development will be considered throughout the design and construction of the scheme, thereby preventing any likely significant effects. Mitigation measures and safety features will be incorporated into the

scheme's design to reduce the risk of major accidents or disasters, particularly concerning fire. The full application will include an independent Fire Statement produced by a third party suitably qualified assessor and Construction Management Plan. The Met Police Crime Prevention Design Team, the London Fire and Emergency Planning Authority, and Local Highways Authority will be consulted at the planning validation stage of the process. Given the proximity to Heathrow Airport an Aviation Impact Assessment would be required in support of the planning application, this would need to address measures to limit any risk to aviation operations at the airport. Furthermore, consultation would be carried out with Heathrow Airport and National Air Traffic Services (NATS) during the planning process. The scope of risk can be appropriately assessed through an Aviation Impact Assessment and would not require assessment through the EIA process.

The development site is within potentially contaminated land, and as such a Land Contamination Assessment would be required in support of any application. This would be adequate in assessing the potential risks which are considered to not be significant accounting for the nature of the use.

The development has the potential to lead to some significant adverse impacts on socioeconomics relating to demand for key health and social infrastructure, however, these potential adverse effects are expected to be mitigated through Section 106 agreements or CIL, as well as by the on-site provisions of public realm and play space, which could result in negligible effects on socioeconomics.

Appropriate conditions could reasonably be applied to limit any risk to human health. The proposed use which would be for C3 residential would not release notable pollutants or hazardous, toxic, or noxious substances.

Therefore, the development is not considered to be EIA development under these criteria.

## ***(2) Location of Development:***

The environmental sensitivity of geographical areas likely to be affected by development must be considered, with particular regard, to:-

- (a) the existing and approved land use;*
- (b) the relative abundance, availability, quality and regenerative capacity of natural resources (including soil, land, water, and biodiversity) in the area and its underground;*
- (c) the absorption capacity of the natural environment, paying attention to the following areas:*
  - (i) wetlands, riparian areas, river mouths;*
  - (ii) coastal zones and the marine environment;*
  - (iii) mountain and forest areas;*
  - (iv) nature reserves and parks;*
  - (v) European sites and other areas classified or protected under national legislation;*

- (vi) areas in which there has already been a failure to meet the environmental quality standards, laid down in Union legislation and relevant to the project, or in which it is considered that there is such a failure;
- (vii) densely populated areas;
- (viii) landscapes and sites of historical, cultural, or archaeological significance.

The 2.4ha site lies on the south-western periphery of Hayes Town Centre and forms part of the wider Hyde Park Hayes (HPH) commercial estate. The wider estate comprises three large office buildings called Hyde Park Hayes 1 (HPH1), Hyde Park Hayes 2 (HPH2) and Hyde Park Hayes 5 (HPH5), and sit alongside a multi-storey car park (MSCP). The site is underoccupied but is lawfully used for offices. Planning permission has also been granted for residential use of plots HPH1, HPH3 and HPH4.

The site does not form part of any wetland, coastal zone, mountain area, or natural reserves and parks. The site is not a 'sensitive area' for the purposes of Regulation 2(1). It does not constitute a Site of Special Scientific Interest (SSSI), National Park, Schedule Monument or Area of Outstanding Natural Beauty (AONB), nor is it designated for nature conservation. The development would be confined to the identified site boundary. The application site consists primarily of previously developed land consisting of concrete hardstanding with small areas of amenity grassland and boundary hedgerows and is likely to have limited ecological value. The potential for the site to accommodate wildlife and habitats for protected species, such as bats, will be robustly assessed within an Ecological Survey and Report to accompany the full application, detailing species present and potential impacts and the mitigation for such local impacts.

The designated Botwell: Thorn EMI Conservation Area, Old Vinyl Factory, Grade II Listed Enterprise House, Locally Listed 'His Master's Voice' building and Locally Listed Thorn/EMI Building are located some 100m to the north of the site. Given the scale of development proposed, there is likely to be an impact on the setting and significance of these heritage assets. Whilst accounting for this, it is considered that the impact can be appropriately assessed through the preparation of a Heritage Impact Assessment and Townscape and Visual Impact Assessment, which assesses the impact of the development on the setting and significance of this designated heritage asset. The site does not lie within an Archaeological Priority Zone and any impact on archaeology may be appropriately assessed at application stage through the preparation of an Archaeological Assessment.

The application site is within Flood Zone 1, meaning it has less than 1 in 1,000 annual probability of river or sea flooding. The site is not within a Critical Drainage Area. The development would not therefore present any significant risk in terms of flooding. A Drainage Assessment and Plans (including SUDS details) and Flood Risk Assessment would be required in support of any planning application and can adequately address any relative risk.

Therefore, the development is not considered to be EIA development under these criteria.

### **(3) Characteristics of the Potential Impact:**

The likely significant effects of the development on the environment must be considered in relation to the previously discussed criteria (Characteristics of the Development and Location of Development), regarding the impact of the development on the factors specified in regulation 4(2), taking into account:-

- (a) the magnitude and spatial extent of the impact (for example geographical area and size of the population likely to be affected);*
- (b) the nature of the impact;*
- (c) the transboundary nature of the impact;*
- (d) the intensity and complexity of the impact;*
- (e) the probability of the impact;*
- (f) the expected onset, duration, frequency and reversibility of the impact;*
- (g) the cumulation of the impact with the impact of other existing and/or approved development;*
- (h) the possibility of effectively reducing the impact.*

The magnitude and spatial extent of the development impact are likely to affect only the local area. The development may cause visual, air quality, and traffic impacts. A Townscape and Visual Impact Assessment, Air Quality Assessment, Transport Impact Assessment, Construction Management Plan, Travel Plan, and Service and Delivery Plan will be required to support the planning application. These will be examined by the Council's specialists during the planning process. The proposed development is unlikely to cause notable transboundary impacts. Any impacts associated with the construction and operation of the proposed development would be confined to the site and land within the immediate vicinity. Construction works would be of a temporary nature and would be mitigated by a Construction Management Plan. Whilst there would be waste generation during the construction and operational phases, this is unlikely to be significant and can be appropriately managed at Construction Phase through a Construction Management Plan and at operational phase through a Waste Management Plan. Waste generation would not be significant in EIA terms and would not give rise to the need for an EIA.

The cumulative impact of the scheme in conjunction with surrounding developments in the immediate vicinity have been considered. Cumulative transport impacts will be assessed in the Transport Impact Assessment, Construction Management Plan, Travel Plan, and Service and Delivery Plan that will accompany the full application.

If mitigation measures are not appropriately addressed in the technical drawings and documents supporting the full planning application, there is potential to mitigate significant local effects (e.g. noise, air quality, traffic, etc.) through mechanisms such as planning conditions or a S106 legal agreement.

Therefore, the development is not considered to be EIA development under these criteria.

#### **4. Conclusion and Recommendation**

The proposal has been assessed against Schedules 1 and 2 of the EIA Regulations.

This urban development project 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 Local Planning Authority is of the opinion that the proposed development will not be likely to have significant effects on the environment as interpreted by the Town and Country Planning (Environmental Impact Assessment) Regulations 2017 (as amended) and thereby **does not constitute EIA development requiring an Environmental Statement**. This is not to say that the proposed development will not have environmental effects of a localised nature, which must be considered in determining any planning application(s).

The determination of this application falls within the scope of Officer's delegated powers.

<b>SIGNED:</b>	Michael Briginshaw
<b>DATED:</b>	11 <sup>th</sup> July 2025