

# HDP Masterplan

Hayes Bridge Retail Park, LB Hillingdon

**DRAFT SUPPLEMENTARY HTVIA TECHNICAL NOTE | JULY 2025**

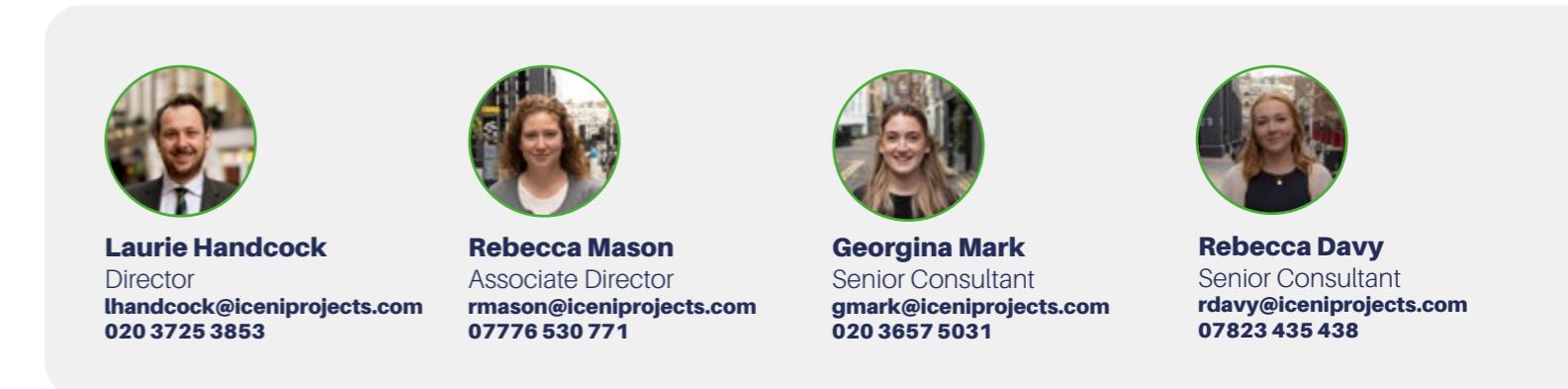
On behalf of Colt



# i | Table of Contents

HDP MASTERPLAN | HAYES BRIDGE RETAIL PARK & HEATHROW INTERCHANGE

<b>1   INTRODUCTION .....</b>	1
Overview .....	2
<b>2   CANALSIDE CONSERVATION AREA .....</b>	3
GLA Response .....	4
Visibility Study .....	5
Visibility Study: Summary .....	9
Photographs of the Conservation Area .....	11
<b>3   CONCLUSION .....</b>	12
Conclusion .....	13
 <b>APPENDIX 1   METHODOLOGY .....</b>	14
Heritage Assessment .....	15
Townscape & Visual Assessment .....	16
 <b>APPENDIX 2   LEGISLATION, POLICY &amp; GUIDANCE .....</b>	18
Heritage & Townscape Policy Summary .....	19
National Policy and Guidance .....	20
Other Relevant Guidance .....	20
 <b>APPENDIX 1   ACCURATE VISUAL REPRESENTATIONS (AVRS) .....</b>	21
Existing, Proposed and Cumulative Verified Views .....	22



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# Section 1

# Introduction.

# 1 | Introduction

## Overview

1.1 This Supplementary HTVIA Technical Note has been prepared on behalf of Colt ('the Applicant') in response to the GLA feedback relating to the full planning application at Hayes Bridge Retail Park and Heathrow Interchange, UB4 0RH ('the Site') within the London Borough of Hillingdon (planning ref no. 78343/APP/2025/719). It provides additional assessment on the potential heritage, townscape and visual impacts of the proposed development, particularly in relation to the Canalside Conservation Area.

1.2 The methodology used in this assessment is set out in **Appendix 1**. In line with the GLA's Practice Note on Heritage Assessment, the methodology for heritage assessment is completely separate from the methodology for townscape and visual impact assessment, both of which are compliant with respective industry best practice guidance. Please refer to **Appendix 2** for a summary of the relevant planning policy, legislation, and guidance.

1.3 The baseline was prepared using ongoing desk-based research and fieldwork undertaken in May 2024.

1.4 The report is produced by Iceni Projects. Specifically, it is authored by: Rebecca Davy BA(Hons) MSc IHBC - Senior Consultant, Built Heritage & Townscape; and Georgina Mark BA(Hons) MSt(Cantab) - Senior Consultant, Built Heritage & Townscape. Rebecca Mason BA(Hons) MSc MA IHBC, Associate Director - Built Heritage & Townscape has provided expert review and guidance.

1.5 The Site comprises Hayes Bridge Retail Park and Heathrow Interchange. It is located on the border of LB Hillingdon and LB Ealing, in between the Hayes (Hillingdon) 'District' town centre, the Uxbridge Road (Hillingdon) town centre, and the Southall (Ealing) 'Major' town centre.

1.6 The Site is occupied by big-box retail units and industrial space, with a large area of associated car parking. It contains no heritage assets. The Site is situated adjacent to an area of fine grain residential character and amongst an area of industrial character. More widely, yet still close to the Site, exists an area of open green space and the emerging Southall Waterside Masterplan (ref. 171562VAR).

1.7 Colt secured planning permission from the London Borough of Hillingdon (LBH) in 2022 for the redevelopment of the former Trinity Data Centre, Veetec Building, and Tudor Works sites at Beaconsfield Road in Hayes to deliver two data centre buildings (alongside substation and tank rooms) which together provide more than 37,000sqm of floorspace (ref. 38421/APP/2021/4045).

1.8 Since the granting of planning permissions for Buildings 1 and 2 (ref. 38421/APP/2021/4045), Colt has acquired Heathrow Interchange and Hayes Bridge Retail Park. The southern boundary of Heathrow Interchange immediately abuts the northern boundary of the Site that Colt is presently redeveloping.

1.9 The description of the proposed development is as follows:

*"Hybrid planning application for a four-phased redevelopment to deliver a data centre campus comprising of: Phase 1 - Full planning permission for (a) a data centre building; (b) energy, power, and water infrastructure; (c) site access and internal roads including a vehicular and pedestrian link between Uxbridge Road and Bullsbrook Road; (d) site security arrangements and security fencing; (e) hard and soft, green and blue, infrastructure; and (f) other ancillary and auxiliary forms of development; Phase 2 - Outline planning permission for (a) an Innovation Hub; (b) hard and soft, green and blue, infrastructure; and (c) other ancillary and auxiliary forms of development (all matters reserved); Phase 3 - Outline planning permission for (a) a data centre building; (b) energy, power, and water infrastructure; (c) internal roads; (d) site security arrangements and security fencing; (e) hard and soft, green and blue, infrastructure; and (f) other ancillary and auxiliary forms of development (all matters reserved); and Phase 4 - Outline planning permission for (a) a data centre building; (b) energy, power, and water infrastructure; (c) internal roads; (d) site security arrangements and security fencing; (e) hard and soft, green and blue, infrastructure; and (f) other ancillary and auxiliary forms of development (all matters reserved)."*

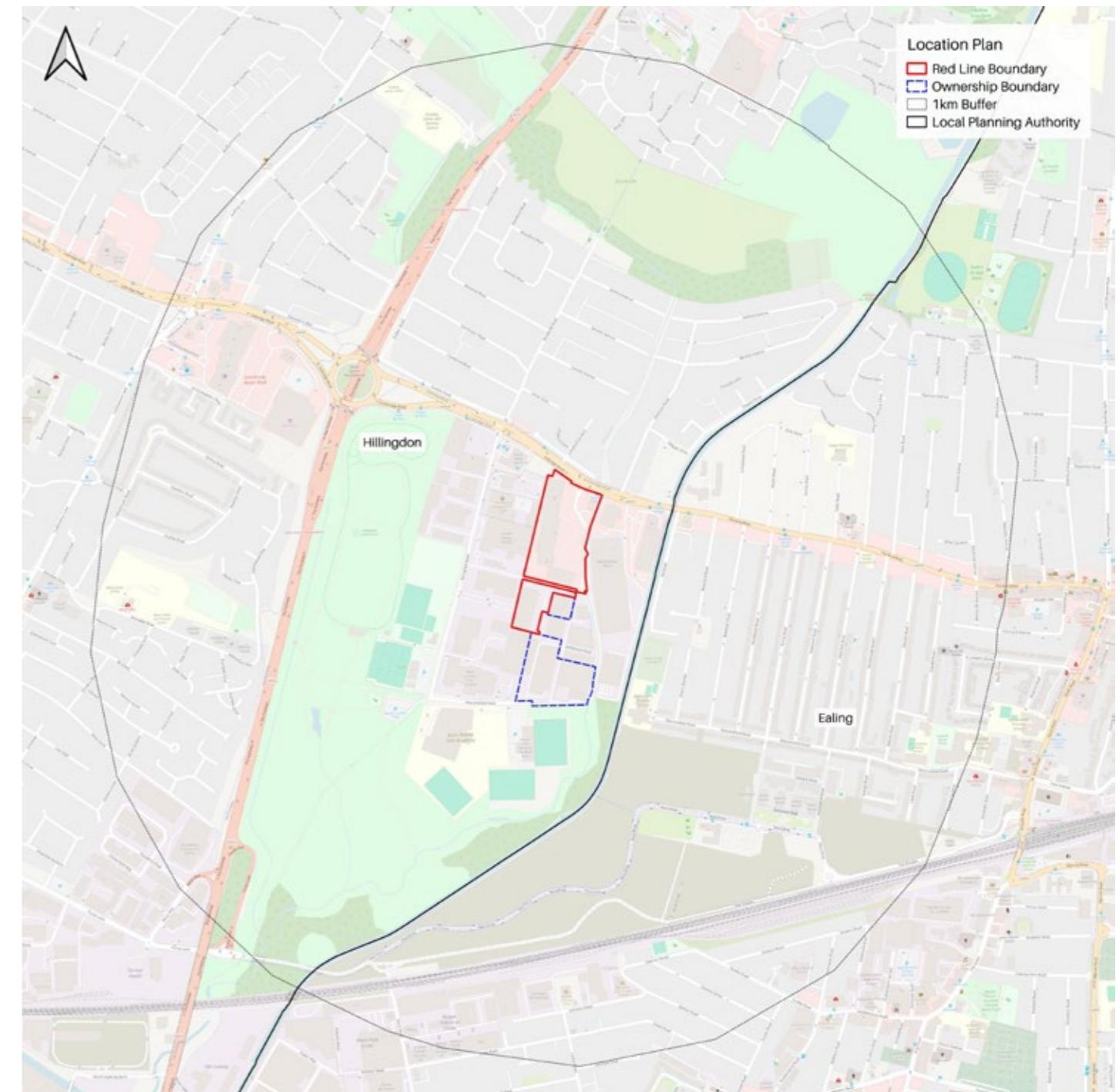


Figure 1.1 Site Location (approximate site boundary)

Section 2

## **Canalside Conservation Area.**

## 2 | Canalside Conservation Area

### GLA Response

2.1 The GLA Planning Report dated 09 June 2025 is highly supportive of the proposed development. In relation to urban design, the GLA support the general design quality, layout, and height of the proposals. The response expresses that the HTVIA provides an acceptable explanation for locating the proposed tall buildings outside of a designated tall building zone, and that the proposed development thus meets the criteria set out in London Plan Policy D9(C). The statement clarifies that the proposed development "would not adversely impact immediate and mid-range townscape views."

2.2 *However, concerns were raised in relation to heritage, quoted here:*

*"35. London Plan Policy HC1 states that proposals affecting heritage assets, and their settings should conserve their significance, avoid harm, and identify enhancement opportunities. The NPPF states that when considering the impact of the proposal on the significance of a heritage asset, great weight should be given to the asset's conservation and the more important the asset, the greater the weight should be. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use. While the site is not in a conservation area and contains no designated or non-designated heritage assets, it is in the setting of the Canalside Conservation Area.*

*36. The effects of the proposed development on the conservation area are shown in Views 2, 6 and 10 of the Heritage, Townscape and Visual Impact Assessment. Due to the height and mass, the proposals are considered to cause very low level of less than substantial harm (in Views 2 and 6 only) to the significance of the conservation area, due to the introduction of a further urbanising element in the tree-lined landscape of the canal.*

*37. As harm would be caused, the development not comply with London Plan Policy HC1 which seeks to avoid harm. In accordance with the NPPF, harm must be weighed against the public benefits of the proposal. A public benefits balancing exercise would be undertaken at Stage 2 once the Council have completed their assessment of the impact on designated and non-designated assets and secured the final package of public benefits."*

2.3 The following study on the Canalside Conservation Area seeks to address the concerns raised about the potential impacts on significance of the asset and demonstrate the proposed developments compatibility with London Plan Policy HC1, Local Plan Policy DMHB1 and HE1, and the NPPF.

2.4 In summary, it is considered that on account of the scale, character and existing setting of the Conservation Area, the proposed development would have a neutral impact and thus preserve the significance of the designated asset. The asset's setting is not characterised by views towards it, or from it. However, kinetic views along the canal's route, experienced as part of activities associated with the asset's function as an active waterway, do contribute to its significance. Importantly, the GLA feedback does not highlight which elements or views contribute to the significance of the asset and as set out in GPA3, views do not automatically contribute to setting; views that make no contribution are *"a matter of amenity rather than of setting."* As the following study will demonstrate, the content of such views varies considerably along the large and narrow conservation area to include areas of green character and areas of urban character. Increasingly, there is an emerging character of large-scale contemporary developments stretching across the canal. The proposed development seeks to build upon this emerging character, replacing tired industrial sheds which detract from the setting of the asset, with a new high-quality development.

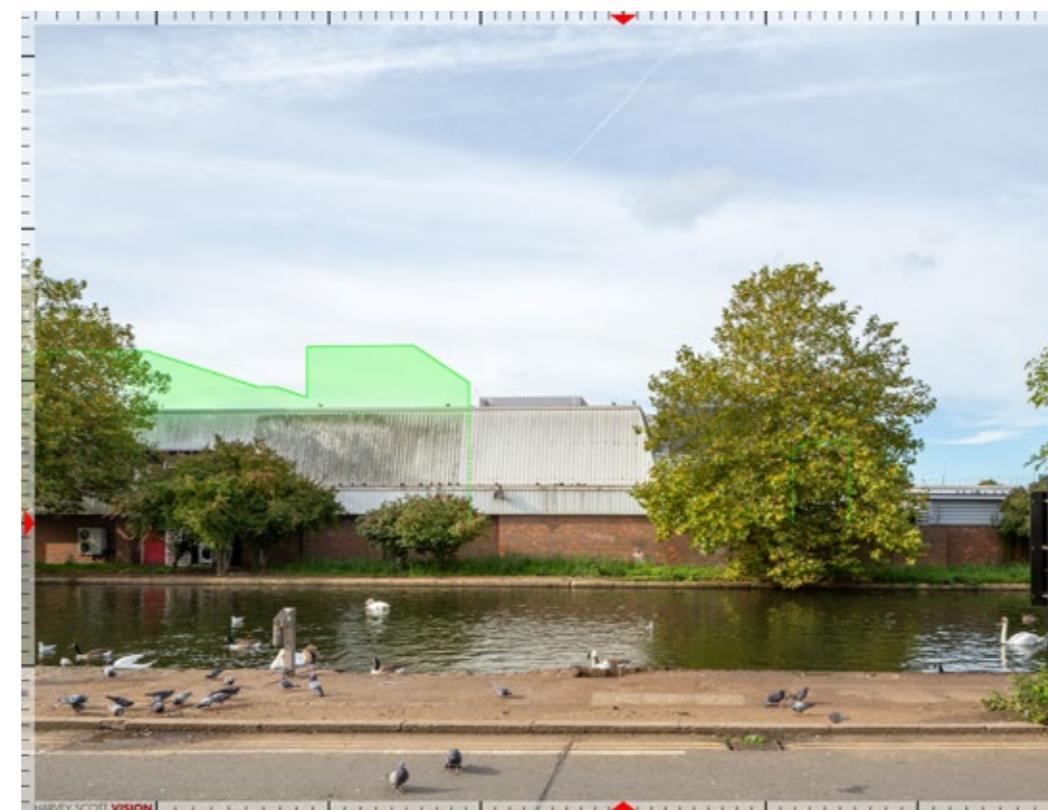


Figure 2.1 TVIA View 2 (Canal Path)

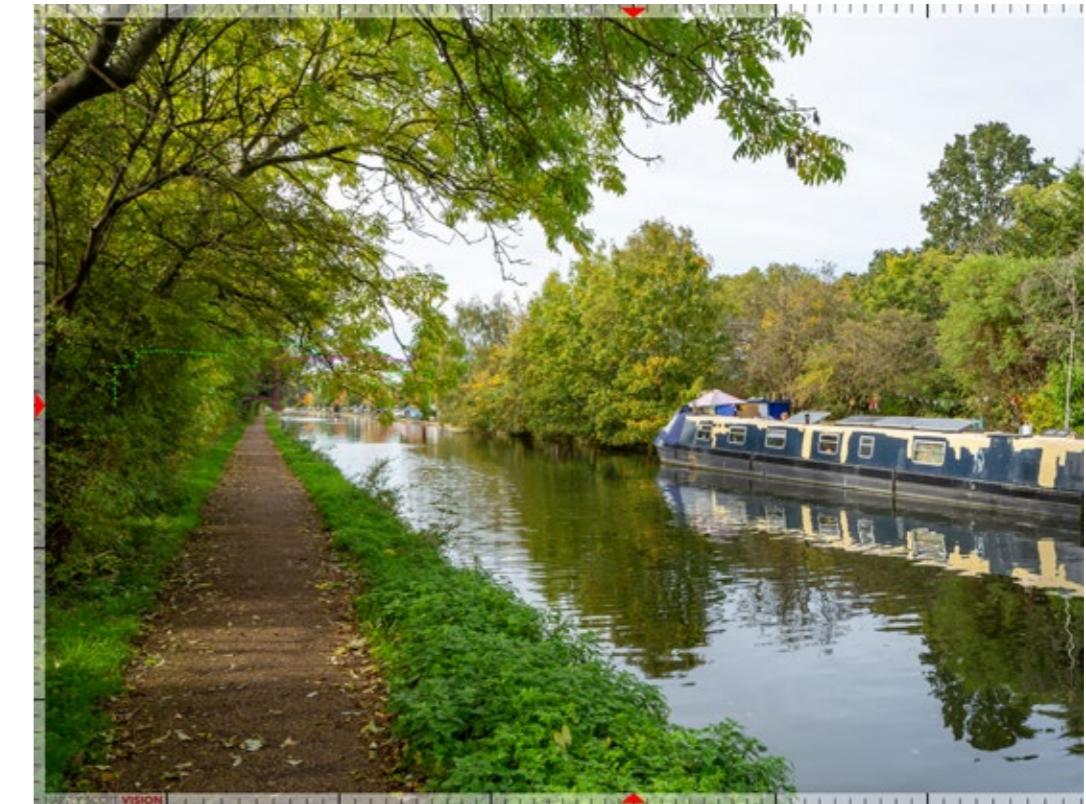


Figure 2.1 TVIA View 2 (Canal Path)



Figure 2.3 TVIA View 10 (The Broadway)

## 2 | Canalside Conservation Area

### Visibility Study

2.5 Figure 2.4 is a supplementary viewpoint plan showing 22 viewpoints designed to capture the kinetic visual experience of the conservation area.

2.6 The Site is highlighted in red for ease of reference, but it is crucial to note that the actual proposed development will consist of high-quality and contextual materials designed to blend in with the surrounding context while introducing significant improvements upon the existing tired big-box units.

2.7 Furthermore, while Vu.City is a useful tool for assessing changes to scale, form and massing, it is very limited in the detail it can show. As such, when considering the views, it should be noted that the model does not include the full detailing or materiality.

2.8 Likewise, the townscape context can appear 'sanitised', less cluttered and more open than in reality. Therefore, existing photographs are provided following the visibility study to show a more accurate condition of the canal and the surrounding townscape.

2.9 The following views are presented with leaves on the trees, as this is considered more representative of the conservation area's character. Even in winter, the area maintains a high level of tree screening due to the enclosed nature of the canal. Additionally, trees within conservation areas are afforded greater protection, making it unlikely that this verdant context will change in the future.

2.10 Importantly, as the visibility study will demonstrate, the proposed development does not rely on tree coverage for screening. Instead, the development and accompanying landscaping plans are designed to integrate with and enhance the existing canalside setting.

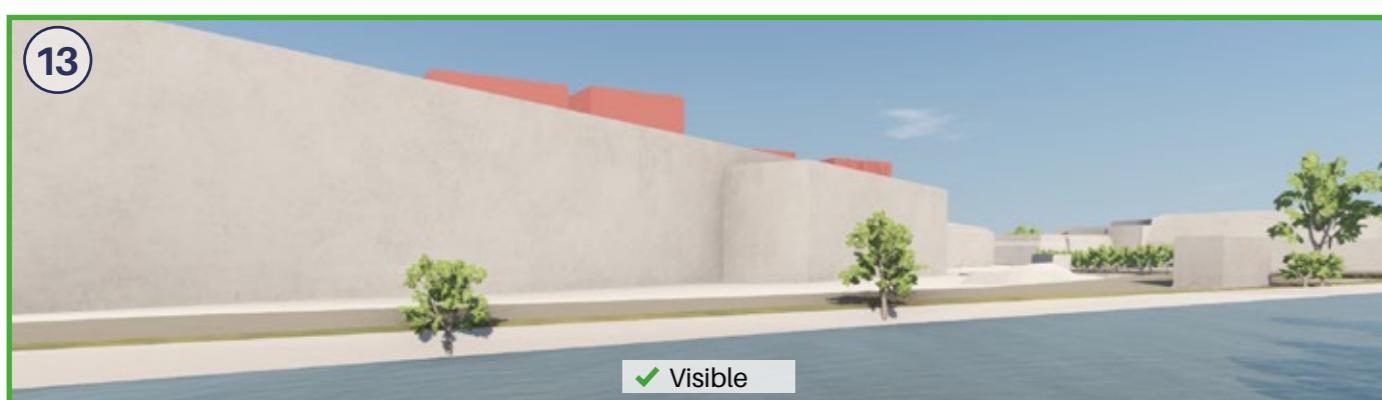


Figure 2.4 Plan of viewpoints to test the visual impacts of the proposed development on the Conservation Area

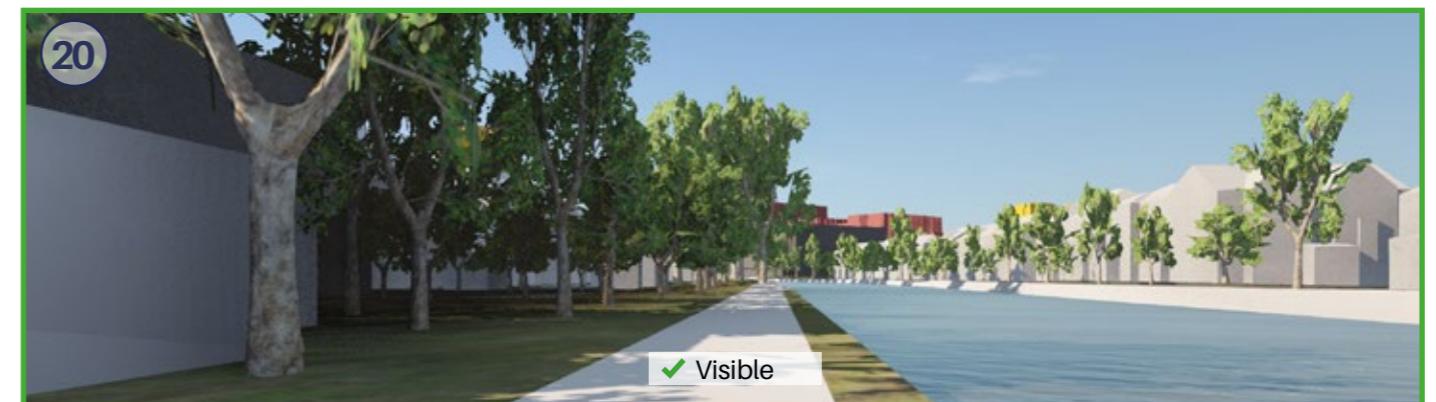
## 2 | Canalside Conservation Area



## 2 | Canalside Conservation Area



## 2 | Canalside Conservation Area



## 2 | Canalside Conservation Area

### Visibility Study: Summary

2.11 Overall, this study demonstrates that the proposed development would have a very limited visibility across the large conservation area. The majority of kinetic views show no visual impact, significantly outweighing the relatively few views where the development is visible. The conservation area is roughly 2.5km in length, with only a small section (approx. 700m) in the middle where the development is visible.

2.12 Furthermore, where the development is visible, aside from a couple of locations directly opposite the Site, it appears as a distant background element. In these cases, it aligns contextually with the height, form, and massing of the surrounding built environment.

2.13 The development is situated in a part of the Conservation Area where the canal corridor is naturally less verdant. The bridge over Broadway marks a key junction in the canal network, leading into a more urban environment. This central section of the Conservation Area thus has a more urban character compared to its northern and southern stretches, which pass through public parks and open green spaces.

2.14 Contrary to the GLA's suggestion, the development does not increase the sense of urbanisation. Instead, it is strategically positioned in an area where the character and significance of the Conservation Area are less reliant on natural landscape features.

2.15 The VuCity views also do not fully capture the qualitative improvement the proposed development offers over the existing industrial-scale retail units. The Site is already visible in these views, but the current buildings detract from the setting, presenting a monotonous mass of corrugated metal sheds. In contrast, the proposed development introduces high-quality materials, varied articulation, and architectural interest, offering a significant enhancement to the existing built context.

2.16 Additionally, the extensive and high-quality landscaping proposed for the Site would address the current lack of green character along this section of the canal. These interventions would enhance biodiversity and provide meaningful urban greening benefits, contributing positively to the setting of the otherwise verdant conservation area.



Figure 2.5 Plan of viewpoints showing the very narrow field of visibility from within the Conservation Area

## 2 | Canalside Conservation Area

2.17 Therefore, we would disagree with the conclusion that the development would cause 'less than substantial harm' to the Conservation Area. Even if as suggested this is at a "very low level". The proposed scheme represents a substantial architectural improvement upon the existing condition of the Site.

2.18 The Grand Union Canal Conservation Area derives its significance from its historic character and appearance, particularly its role as a nationally important transport route. This significance is tied to its physical composition: the linear historic waterway, the towpaths, banks, and bridges. These features are central to the special interest of the Conservation Area, all of which will be preserved by the proposed development. Existing views towards the Site do not specifically contribute to the significance of the asset and, as set out in Historic England's GPA3, "views out from heritage assets that neither contribute to significance nor allow appreciation of significance are a matter of amenity rather than of setting."

2.19 The character of the setting of the Conservation Area as a whole is highly varied on account of its size. While some sections pass through verdant public parks, others have a more urban, functional quality reflective of the canal's working past. The Site lies within one of the less verdant, and more industrial stretches, where traces of the canal's gritty commercial history are still evident. This variation in character is an important aspect of the Conservation Area's overall significance.

2.20 The proposed development is not situated directly on the canal but lies within its broader setting. Where it is visible, it appears only as a background element and does not result in any direct impact on the canal itself. Importantly, visibility alone is not inherently harmful. As outlined in Historic England's staged approach in GPA3, the assessment of impact must consider the nature, quality, and context of the change introduced, rather than relying solely on the fact of visibility.

2.21 In this case, the proposed scheme represents a substantial aesthetic and architectural improvement over the existing condition, which consists of low-quality industrial sheds and extensive hardstanding used for surface car parking. The new development introduces high-quality design, varied massing, and significant urban greening, which will enhance biodiversity and improve the overall setting of this section of the canal.



Figure 2.6 In views where the proposed development will be visible, it will not change the fundamental characteristics of the Conservation Area.

## 2 | Canalside Conservation Area

### Photographs of the Conservation Area



Figure 2.7 Yeading Brook, an offshoot of the Canal



Figure 2.8 Bankside, looking towards the Site



Figure 2.9 Bankside



Figure 2.10 In sections the Canal loses its verdant character due to big-box industrial units



Figure 2.11 There are a range of building types, heights and materials on the canal



Figure 2.12 The canal is vulnerable to misuse, improper waste disposal, and vandalism

# Section 3

# **Conclusion.**

## 3 | Conclusion

### Conclusion

3.1 This Supplementary HTVIA Technical Note has been produced by Iceni on behalf of Colt ('the Applicant') in response to the GLA's commentary regarding the full planning application at Hayes Bridge Retail Park and Heathrow Interchange, UB4 0RH ('the Site').

3.2 To summarise, the GLA praised the impact of the proposed development in relation to urban design and townscape, but raised questions on the impact to the nearby Canalside Conservation Area. This Technical Note has sought to provide additional information to demonstrate that there will be **no harm** to the Conservation Area.

3.3 The significance of the Conservation Area primarily lies in its character, rooted in the Grand Union Canal's historic role as a nationally important transport route and expressed through its physical composition of waterways, banks, tow-paths, and bridges.

3.4 The Site does not contribute to its setting, and the proposed development's simple, high-quality design ensures that its historic character as an urban canal remains legible and the significance of the asset is preserved.

3.5 In response to the GLA's comment that the proposed development would cause a "very low level" of less than substantial harm to the Conservation Area, the visibility study demonstrates that the proposed development will have a very limited presence within the Conservation Area's setting, with the majority of kinetic views showing no visual impact. In the few views where the development is perceptible, it appears as a distant background element, well-integrated into the urban form in terms of height, scale, and massing.

3.6 The comment that the development introduces a harmful "urbanising element" overlooks the existing condition of the Site and its immediate context. The site lies within one of the more industrial stretches of the Conservation Area, where the existing townscape consists of low-quality industrial sheds and expansive hardstanding. Far from intensifying urbanisation, the proposal replaces a visually and functionally poor environment with a development of higher architectural quality, improved articulation and landscaping. It is important to stress that the proposed development is not directly on the canal and does not alter any of the features that contribute to the significance of the Conservation Area.

3.7 While visibility is acknowledged in two out of the ten verified views, visibility in itself does not equate to harm. The proposed development maintains the legibility of the canal corridor and preserves

3.8 the integrity of its setting. Therefore, we consider the claim of "less than substantial harm" to be unsubstantiated and inconsistent with the evidence presented in the HTVIA and this supplementary analysis.

In line with London Plan Policy HC1 and the NPPF, the proposal conserves the significance of the Conservation Area and preserves, if not enhances, its setting. As such, there is no harm to be weighed against public benefits. Nonetheless, the proposal does deliver clear public benefits, most notably the replacement of poor-quality industrial units with high-quality architecture, meaningful landscaping, and enhanced biodiversity, all of which support sustainable placemaking objectives without compromising the character or significance of the Conservation Area as a heritage asset.



Figure 3.1 CGI of the Proposed Development from The Broadway prepared by Studio NWA

# Appendix 1

# **Methodology.**

# Appendix 1 | Methodology

## Heritage Assessment

This report provides an assessment of the significance of identified heritage assets and the potential effects of the proposed development. It has been informed by:

- Relevant legislation, and national and local planning policy (see Section 2); and
- Best practice guidance set out in:
  - Principles of Cultural Heritage Impact Assessment in the UK (IEMA/IHBC/CIfA, 2021)
  - Conservation Principles, Policies and Guidance (Historic England, 2008)
  - Good Practice Advice in Planning Notes (Historic England, various).

Under the requirements of the above policy and guidance, the process of heritage impact assessments can be summarised as involving three parts:

- Understanding the cultural significance of identified designated and non-designated heritage assets and their setting;
- Understanding the nature and extent of potential effects on significance and settings of identified heritage assets; and
- Making a judgement on the impact that the Proposed Development may have on significance and setting.

There are two ways in which the Proposed Development can affect heritage assets:

- by physical changes to the fabric, use and visual appearance of designated or non-designated heritage assets (known as direct effects); and
- by changes to the setting of designated or non-designated heritage assets in the vicinity (known as indirect effects).

### Understanding Significance

Heritage assets are defined in Annex 2 of the NPPF as: '*A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing).*'

The setting of a heritage asset is defined as: '*the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral*' (NPPF, Annex 2).

Non-Designated Heritage Assets ('NDHAs') are defined as buildings, structures and places which have a degree of heritage significance but do not meet the criteria for designation: '*Only a minority [of buildings] have enough heritage significance to merit identification as non-designated heritage assets*' (PPG paragraph 039).

NPPF paragraph 207 requires the significance of any heritage asset that may be affected by the Proposed Development to be described in a proportionate manner. The methodology used here for understanding the significance draws from the approach set out in Historic England's Conservation Principles and NPPF Annex 2 by defining heritage interests. As defined in the PPG (Historic Environment, para 06), the heritage interest may be:

- Archaeological;
- Architectural and artistic; and/or
- Historic.

It is important to note that understanding significance is primarily a descriptive exercise. However, guidance by IEMA, IHBC and CIfA identifies that 'importance' can be defined and scaled as 'high', 'medium' or 'low' or any other simple scale that offers a form of gradation. This is done in broad terms, as per Table H1. The ability to scale assets, including differentiating those of 'highest significance' is also established in the NPPF (i.e. para.213).

As identified in NPPF paragraphs 207 and 208, significance can also derive from the setting of a heritage asset. HE's GPA3 guidance gives general advice on understanding setting and how it may contribute to significance. This assessment follows the staged approach set out in GPA3 guidance to identifying the level of contribution that setting makes to the significance of heritage assets.

### Assessing Effects

Legislative and policy requirements for the assessment of effects on heritage assets require the assessor to establish whether the value is preserved, better revealed/enhanced or harmed as a result of the Proposed Development.

Beneficial effects occur when the Proposed Development would enhance the value or contribution of the setting to value of heritage assets.

Should harm arise to the significance or contribution of setting to significance of designated heritage assets, there is a requirement in NPPF paras.212-215 to determine whether the level of harm amounts to 'substantial harm' or 'less than substantial harm'. Any harmful impact to the significance of a designated heritage asset should require and clear and convincing justification and be weighed against the public benefits of the Proposed Development. Great weight should be given to asset's conservation, the greater the harm, the greater the benefits that will be needed to justify approval.

For any harm to NDHAs, NPPF paragraph 216 requires balanced judgement with regard to scale of harm or loss and significance.

As established in Bramshill (2021) and Whitechapel Bell Foundry (2021), when assessing effects, it is possible to undertake an internal heritage balancing exercise where relevant heritage harms and heritage benefits can be balanced to come to a 'net' position.

Significance	Designation of Receptor
Very High	Site acknowledged of international importance World Heritage Site
High	Grade I or Grade II* Listed Asset Scheduled Monument
Medium	Grade II Listed Asset Conservation Area
Low	NDHAs of higher local importance (including local listing) Designated Heritage Assets compromised by poor preservation
Very Low	NDHAs of lower local importance or compromised by poor preservation.

Table H1: Heritage Significance

# Appendix 1 | Methodology

## Townscape & Visual Assessment

The purpose of the townscape and visual appraisals is to determine the likely townscape and visual effects of the proposal by considering a combination of the townscape or viewer's sensitivity, and the magnitude of change that will be experienced.

The methodology used by Iceni Projects to assess the likely townscape and visual effects of the proposal is based on best practice guidance set out by the Landscape Institute in:

- Guidelines for Landscape and Visual Impact Assessment (GLVIA, Third Edition, 2013);
- Townscape Character Assessment Technical Information Note (TIN 05/17, 2018); and
- Visual Representation of Development Proposals, Technical Guidance Note (TGN 06/19, 2019).

GLVIA states in para. 1.1 that when identifying landscape/townscape and visual effects there is a '*need for an approach that is in proportion to the scale of the project that is being assessed and the nature of the likely effects. Judgement needs to be exercised at all stages in terms of the scale of investigation that is appropriate and proportional.*'

GLVIA recognises within para. 2.23 that professional judgement is at the core of LVIA/TVIA, and that while some change can be quantified, '*much of the assessment must rely on qualitative judgements*'. The Landscape Institute's Technical Committee has advised that the 2013 revision of GLVIA '*places greater emphasis on professional judgement and less emphasis on a formulaic approach*'.

## Townscape Character

Townscape is defined in GLVIA at para.2.7 as '*the landscape within the built-up area, including the buildings, the relationship between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces.*'

The assessment of townscape character provides an understanding of the distinctive qualities and characteristics that make up an area of townscape, including an understanding of how a place has evolved over time. Character analysis is supported by materials such as maps, illustrations and photographs.

### Townscape Sensitivity

Establishing townscape sensitivity involves combining judgments about: (i) the value of the townscape character; and (ii) the susceptibility of the townscape to the change caused by the proposal.

The value of a townscape character area is defined in TIN 05/17 as its '*relative importance*' to '*different stakeholders*'. Value can be influenced by a range of factors including its intactness/condition, scenic quality, rarity, representativeness, conservation interests (i.e. heritage or environmental designations), recreational value, perceptual qualities or communal associations.

The susceptibility of townscape character areas to change is the ability of the townscape receptor to accommodate change without undue consequences for the maintenance of the aspects of the baseline condition that are of townscape value.

Value and susceptibility to change will be described in line with Tables T1 and T2. Overall sensitivity will be calculated by combining the two resulting judgements.

### Visual Sensitivity

Assessments of visual effects focuses on the likely effects to visual receptors, i.e. people experiencing townscape views, and considers changes in visual amenity as a result of the proposal.

Establishing visual sensitivity involves combining judgments about: (i) the value of the view; and (ii) the susceptibility of the visual receptor to the change caused by the proposal.

The value attached to views relates to planning designations or their identification in tourist guidebooks, literature, art etc.

For visual receptors (i.e. people), susceptibility to change depends on their circumstances (location, time of day, season, length of exposure to view) and reason for being at this viewpoint (i.e. passing through while commuting or using the area for recreation).

Value and susceptibility to change will be described in line with Tables V1 and V2. Overall sensitivity will be calculated by combining the two resulting judgements.

Townscape Value	Typical Criteria
High	Often featuring or contributing positively to national heritage designations (i.e. conservation areas, listed buildings), protected view corridors/skylines, designated green spaces or award-winning design. Generally of high quality urban design or amenity value and in good condition, with very few detracting features (if any). A rare example of, or representative of, a particular characteristic townscape element or feature.
Medium	Often featuring or contributing positively to local heritage designations (i.e. locally listed buildings, areas of townscape value), locally identified view corridors, or locally designated green spaces. In relatively good condition, with areas of high quality urban design or amenity value, or containing some particularly characteristic features. Generally few detracting features overall.
Low	Generally without designations, of low quality and in poor condition with scope for enhancement in terms of appearance and amenity. May contain some positive features, but these do not characterise the whole.
Very Low	Of very low quality and in very poor condition with notable scope for enhancement in terms of appearance and amenity.

Table T1: Townscape Value

Townscape Susceptibility to Change	Typical Criteria
High	Townscape with a little ability capacity to accommodate the type of change proposed, owing to the interaction of the proposed development with the prevailing character, built form, topography etc, and the limited presence of screening effects (if applicable)..
Medium	Townscape with a good capacity to accommodate the type of change proposed as it might be reflective of the scale and character of parts of the surrounding townscape. There are opportunities for enhancement that proposals may address and/or some existing screening effects (vegetation, density of development, orientation of streets etc.).
Low	Townscape with a very good capacity to accommodate the type of change proposed, as the proposed development may comprise only a small part of the wider townscape, or being in-keeping with the overarching character of the surroundings. There may be distinct opportunities for enhancement and/or a high level of existing screening effects (vegetation, density of development, orientation of streets etc.).

Table T2: Townscape Susceptibility to Change

Visual Value	Typical Criteria
High	Designated or protected viewpoint, vista or panorama. Views related to highly graded heritage designations (i.e. World Heritage Sites, Grade I or II* listed buildings or registered parks and gardens, or of high importance to a conservation area), identified tourist spots or with well-known cultural associations.
Medium	Locally identified viewpoint, vista or panorama. Views related to heritage designations (i.e. conservation areas, Grade II listed buildings, locally listed buildings) or from within designated green/amenity spaces.
Low	General townscape view without designation, although may have some amenity value for local residents.
Very Low	General townscape view without designation, and likely of no amenity value for local residents.

Table V1: Visual Value

# Appendix 1 | Methodology

## Magnitude of Change

The magnitude of change is considered to be a combination of (i) the size and scale of the potential change; (ii) the geographical extent of the area affected; and (iii) the duration of the change of the proposal in operation and its reversibility. Magnitude of change will be described in line with Table M1.

## Overall Effect

Table E1 provides a matrix for determining the overall effect based on the sensitivity of the receptor and the magnitude of impact. Consideration is given to the extent mitigation and/or enhancement has been achieved through design and whether the qualitative nature of the resultant effect is, therefore, 'beneficial', 'adverse' or 'neutral'.

Many urban developments provide an opportunity to enhance the condition, appearance and functionality of an existing townscape. Urban developments of quality, therefore, often have mitigation built into them by design and are designed to be visible. This can differ somewhat from the approach to Landscape and Visual Impact Assessments (as outlined in GLVIA3) where, generally, the visibility of a scheme can be inherently harmful when it is built development in a rural landscape.

Beneficial effects occur when the Proposed Development would give rise to:

- enhancement of the overall townscape quality or reinforcement of the key characteristics of townscape character; and/or
- enhancement of visual amenity of receptors.

Adverse effects occur when the Proposed Development would give rise to:

- harm to the overall townscape quality or the key characteristics of townscape character; and/or
- harm to the visual amenity of receptors.

As per GLVIA para. 5.37, it is possible for effects to be neutral and this a matter of professional judgement. These include:

- the degree to which the proposal fits with, or preserves, an existing character;
- where a fine balance occurs between beneficial and adverse effects, 'neutral' is considered the centre point of the nine-point scale. This assessment is on occasion adopted where a discernible impact is identified but other benefits are also delivered through the Proposed Development, for example, high-quality design in its own right even if contrasting to existing character.

The meaning of 'neutral' is distinct from the meaning of 'negligible' and these terms should not be conflated by the reader.

## Cumulative Effect

The assessment takes the following approach as set out in GLVIA: "the additional changes caused by a proposed development in conjunction with other similar developments" (paragraph 7.3). This "additional" approach focuses on the additional effects of the project being assessed, on top of the cumulative baseline (as per paragraph 7.18) and has been selected to ensure that the scope of the assessment is reasonable and proportionate to the nature of the project (as per paragraph 7.5 and paragraph 7.18).

## Visualisation

The visualisations within this report have been prepared in general conformance with the Landscape Institute's TGN 06/19. This advocates a proportionate and reasonable approach, which includes professional judgement, in order to aid informed decision making.

In this case, Type 4 visualisations (verified views or AVRs) were prepared by Harvey Scott Vision. Their methodology is included at Appendix 3.

The AVRs are produced as a mixture of shaded wirelines (AVR level 1) and renders (AVR level 3).

Visual Susceptibility to Change	
High	Users of public rights of way, open spaces or outdoor recreational facilities where the purpose of the recreation is the enjoyment of visual amenity, such as visitors to heritage assets (such as National Trust properties, Conservation Areas), tourist spots or parks with generally open or unspoilt views.
Medium	Users of public rights of way, open spaces or outdoor recreational facilities where visual amenity is secondary to activity (e.g. sports pitches, golf courses, shopping). Open views but from less sensitive areas. Residents of an area more likely to notice change in their surroundings when travelling to or from home.
Low	Users of public rights of way, open spaces or outdoor recreational facilities where the view is restricted or incidental to the activity. People in transit (pedestrians, cyclists, motorists, public transport) or undertaking activities (i.e. commuting, working) where any views are incidental to the activity or capacity to take in views is restricted.

Table V2: Visual Susceptibility to Change

Magnitude of Impact	
High	Total loss, major alteration or fundamental change to key characteristics or features of the baseline.
Medium	Partial loss, material alteration or visible but contextual change to key characteristics or features of the baseline.
Low	Minor loss, alteration or discernible but non-material change to key characteristics or features of the baseline.
Very Low	Barely distinguishable or very limited change from baseline conditions.
No Change	No change from baseline conditions

Table M1: Magnitude of Impact

Overall Effect	Magnitude of Impact				
	Sensitivity	High	Medium	Low	Very Low
High	Major	Moderate	Moderate / Minor	Minor	No Effect
Medium	Moderate	Moderate	Minor	Minor / Negligible	No Effect
Low	Moderate / Minor	Minor	Minor / Negligible	Negligible	No Effect
Very Low	Minor	Minor / Negligible	Negligible	Negligible	No Effect

Table E1: Overall Effect

Appendix 2

## **Legislation, Policy, and Guidance.**

## Appendix 2 | Legislation, Policy, and Guidance

### Heritage & Townscape Policy Summary

#### Legislation

3.9 Where any development may have a direct or indirect effect on designated heritage assets, there is a legislative framework to ensure the proposals are considered with due regard for their impact on the historic environment: the Planning (Listed Buildings and Conservation Areas Act) 1990 ('the Act').

3.10 Section 72(1) of the Act states that in relation to Conservation Areas, special attention shall be paid to the desirability of preserving or enhancing the character or appearance of that area.

#### Local Policy

3.11 The local Statutory Development Plan includes the following documents relevant to this report:

- LB Hillingdon Local Plan Part 1: Strategic Policies (adopted November 2012)
- LB Hillingdon Local Plan Part 2: (adopted January 2020).
- London Plan (2021)

3.12 Specific policies which are relevant to this heritage, townscape and visual impact assessment are summarised in **Table 2.1**, adjacent.

3.13 Other policies which are relevant to the emerging proposal as a whole include the following:

*London Plan:*

- Policy E4: Land for Industry, Logistics and Services to Support London's Economic Function;
- Policy E5: Strategic Industrial Locations; and,
- Policy E8: Sector Growth Opportunities and Clusters.

*Local Plan Part 1:*

- Policy E1: Managing the Supply of Employment Land
- Policy E2: Location of Employment Growth

*Local Plan Part 2:*

- Policy DME1: Employment Uses on Designated Employment Sites

Statutory Development Plan		
Policy Document	Relevant Policy	Summary
LB Hillingdon Local Plan Part 1: Strategic Policies (adopted November 2012)	Strategic Objective 1: Heritage	Conserve and enhance the borough's heritage and their settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.
	Policy HE1: Heritage	The Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes Registered Parks and Gardens and historic landscapes, both natural and designed. The Council will encourage the reuse and modification of heritage assets, where appropriate, when considering proposals to mitigate or adapt to the effects of climate change. Where negative impact on a heritage asset is identified, seek alternative approaches to achieve similar climate change mitigation outcomes without damage to the asset.
	Policy BE1: Built Environment	All new developments should be designed to be appropriate to the identity and context of Hillingdon's buildings, townscape, landscapes and views, and make a positive contribution to the local area in terms of layout, form, scale and materials and seek to protect the amenity of surrounding land and buildings.
LB Hillingdon Local Plan Part 2: (adopted January 2020).	Policy DME 1: Employment Uses on Designated Employment Sites	This policy offers support for employment proposals on S1Ls.
	Policy DMHB 1: Heritage Assets	The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where: <ul style="list-style-type: none"> <li>i. It sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;</li> <li>ii. It will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;</li> <li>iii. Opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.</li> </ul>
	Policy DMHB 8: Registered Historic Parks, Gardens and Landscapes	Development within, or adjacent to a registered or historic park, garden or landscape, must respect its special character, environmental quality, important views and vistas. Development proposals should also make provision (based on detailed research) for the restoration and long term management of the park, garden or landscape.
London Plan (2021)	Policy DMHB 10: High Buildings and Structures	This policy requires that proposals are contextual. These buildings must be situated in Uxbridge or Hayes town centres or designated areas, and have high public transport accessibility. They should be proportionate in height, form, and massing to their surroundings, integrate well with the local street network and open spaces, and local views. High architectural quality and design innovation are essential, with attention to their skyline contribution, street-level design, materials, lighting, and night-time effects.
	Policy D3: Optimising site capacity through a design-led approach	Policy D3 requires that <i>'all development must make the best use of land by following a design-led approach that optimises the capacity of sites...[Meaning] ensuring that development is of the most appropriate form and land use for the site'</i> . This includes: enhancing local context by positively responding to local distinctiveness through layout, orientation, scale, appearance and shape; providing active frontages, and responding to the existing character of a place.
	Policy D9: Tall Buildings	Tall buildings should be in suitable locations, either identified in local plans, or, as recently established in the Master Brewer Case, in locations where a tall building would meet the criteria set out in Part C. This includes: making a positive contribution to the skyline, spatial hierarchy and local townscape; supporting the pedestrian scale and vitality of the street; being of exemplary architectural quality and avoiding harm to heritage assets; and demonstrating the area capacity for the quantum of development.
	Policy E5: Strategic Industrial Locations	The site is located within a Strategic Industrial Location. This policy specifically encourages the intensification of industrial land uses (such as a data centres) within S1Ls. One way of delivering intensification of floorspace is inherently through the increase of building heights. It follows that this policy must therefore inherently expect a degree of townscape change and intensification.
	Policy HC1: Heritage conservation and growth	This policy requires boroughs to develop evidence that demonstrates a clear understanding of London's historic environment. It further requires Boroughs to use this knowledge to inform the effective integration of London's heritage in regenerative change. Part C states: <i>'Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process'</i> .

Table 2.1: Summary of Local Policy

## Appendix 2 | Legislation, Policy, and Guidance

### National Policy and Guidance

#### National Planning Policy Framework (February 2025)

3.14 The NPPF affirms, in paragraph 135, the need for new design to function well and add to the quality of the surrounding area, establish a strong sense of place, and respond to local character and history, while not preventing or discouraging appropriate optimisation, innovation or change (such as increased densities).

3.15 Paragraph 139 requires development that is not well-designed to be refused, whilst significant weight should be given to development which reflects local design policies and/or is outstanding, innovative and helps raise the design standards in the area.

3.16 Paragraph 207 states that local planning authorities should require applicants to describe the significance of heritage assets affected and any contribution made by their setting. The level of detail provided should be proportionate to the significance of the asset.

3.17 Paragraph 210 emphasises that local planning authorities should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation.

3.18 Paragraphs 212 - 215 address the balancing of harm against public benefits. If a balancing exercise is necessary (i.e. if there is any harm to the asset), great weight should be applied to the statutory duty where it arises, and any harm to significance should require a clear and convincing justification. Where substantial or less than substantial harm will arise as a result of a proposed development, this harm should be weighed against the public benefits of a proposal, including for less than substantial harm, securing its optimum viable use (para.215). In the case of substantial harm, this must be necessary to achieve substantial public benefits, or a number of criteria set out in paragraph 214 apply.

#### Planning Practice Guidance (Last Updated June 2021)

3.19 Paragraph 002 states that conservation is an active process of maintenance and managing change that requires a flexible and thoughtful approach.

3.20 Paragraph 006 sets out how heritage significance can be understood in the planning context as archaeological, architectural, artistic or historic.

3.21 Paragraph 018 explains that, where potential harm to designated heritage assets is identified, it needs to be categorised as either less than substantial harm or substantial harm (which includes total loss) in order to identify which policies in the NPPF (paragraphs 207-208) apply. It goes on to state that whether a proposal causes substantial harm will be a judgment for the decision-maker, having regard to the circumstances of the case and the policy in the NPPF. In general terms, substantial harm is a high test, so it may not arise in many cases.

3.22 The PPG also provides clear guidance in paragraph 020 on the meaning of 'public benefits', particularly in relation to historic environment policy, including paragraphs 207 to 208 of the NPPF. The PPG makes clear that public benefits should be measured according to the delivery of the three key drivers of sustainable development: economic, social and environmental outcomes, all of which are reflected in the objectives of the planning system, as per Paragraph 8 of the NPPF.

### Other Relevant Guidance

#### Historic Environment Good Practice Advice in Planning

##### GPA 2: Managing Significance in Decision-Taking in the Historic Environment [March 2015]

3.23 This document provides advice on numerous ways in which decision-taking in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to its significance. The advice suggests a structured staged approach to the assembly and analysis of relevant information and is as follows:

- Understand the significance of the affected assets;
- Understand the impact of the proposal on that significance;
- Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
- Look for opportunities to better reveal or enhance significance;
- Justify any harmful impacts in terms of the sustainable development objective of conserving significance and the need for change;
- Offset negative impacts on aspects of significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

3.24 The advice reiterates that heritage assets may be affected by direct physical change or by change in their setting. The document sets out the recommended steps for assessing significance and the impact of development proposals upon it, including examining the asset and its setting and analysing local policies and information sources.

##### GPA 3: The Setting of Heritage Assets (2nd Edition) [December 2017]

3.25 This advice note focuses on the management of change within the setting of heritage assets. It replaces The Setting of Heritage Assets: Historic Environment Good Practice Advice in Planning Note 3 - 1st edition, (2015) and Seeing the History in the View: A Method for assessing Heritage Significance within Views (English Heritage, 2011).

3.26 This note provides assistance concerning the assessment of the setting of heritage assets and the statutory obligation on decision-makers to have special regard to the desirability of preserving listed buildings and their settings; and that settings can contribute to the significance of a heritage asset.

3.27 This note gives general advice on understanding setting and how it may contribute to the significance of heritage assets. It also provides a staged approach to taking decisions on the level of the contribution which setting and related views make to the significance of heritage assets.

3.28 Particularly for developments that are not likely to be prominent or intrusive, the assessment of effects on setting may often be limited to the immediate surroundings.

3.29 An analysis should be made to assess whether the setting of an affected heritage asset makes a contribution to its significance, and the extent and/or nature of that contribution. Both setting, and views which form part of the way a setting is experienced, may be assessed additionally for the degree to which they allow significance to be appreciated.

#### National Design Guide (2021) and National Model Design Code (2021)

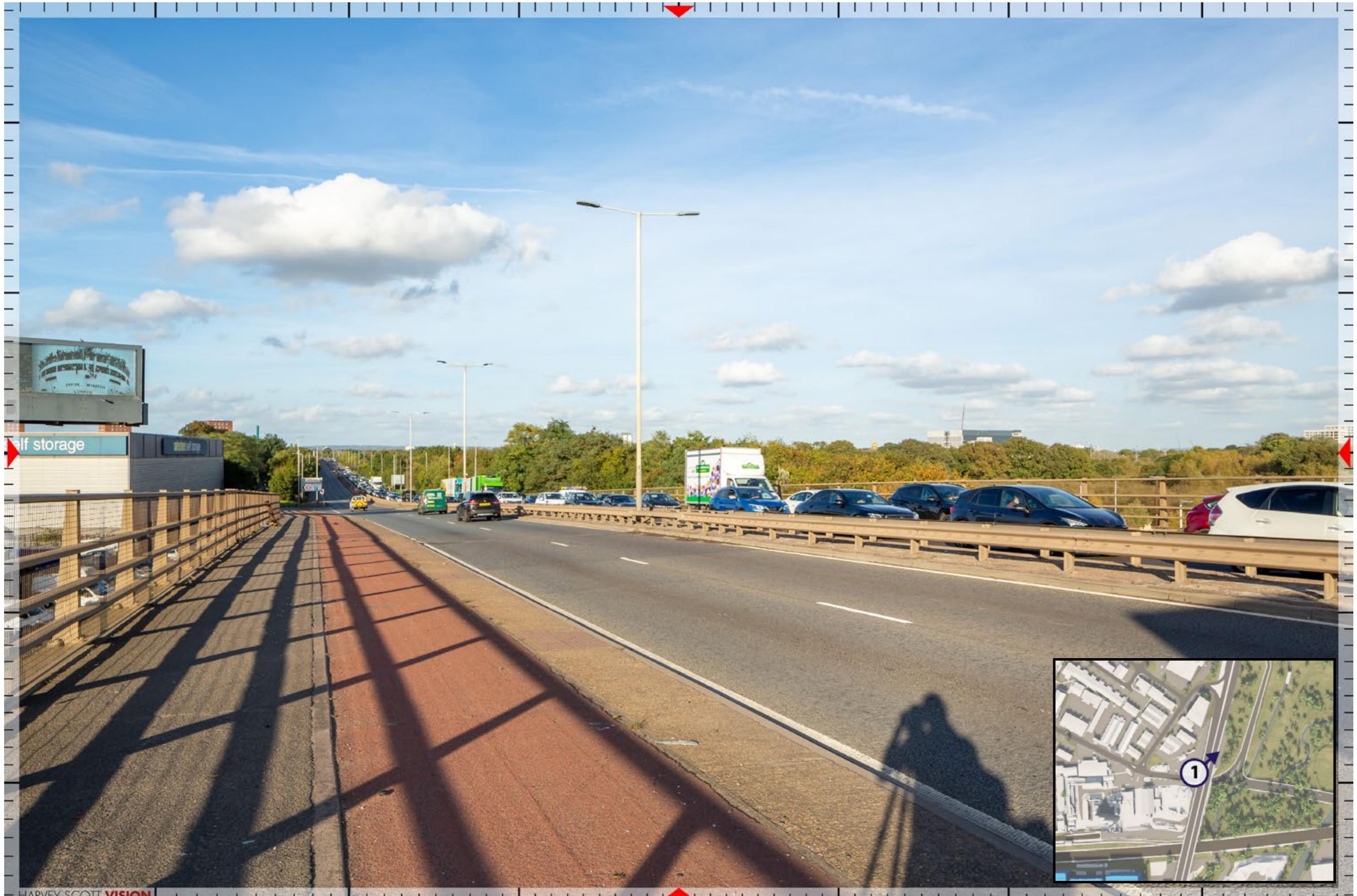
3.30 The contents of these documents is relevant to an understanding of the design intention behind the emerging proposal. However, the purpose of these documents is to inform the preparation of design codes and the documents are not to be used as a tool to assess proposed developments in isolation.

#### Hillingdon Townscape Character Study (2023)

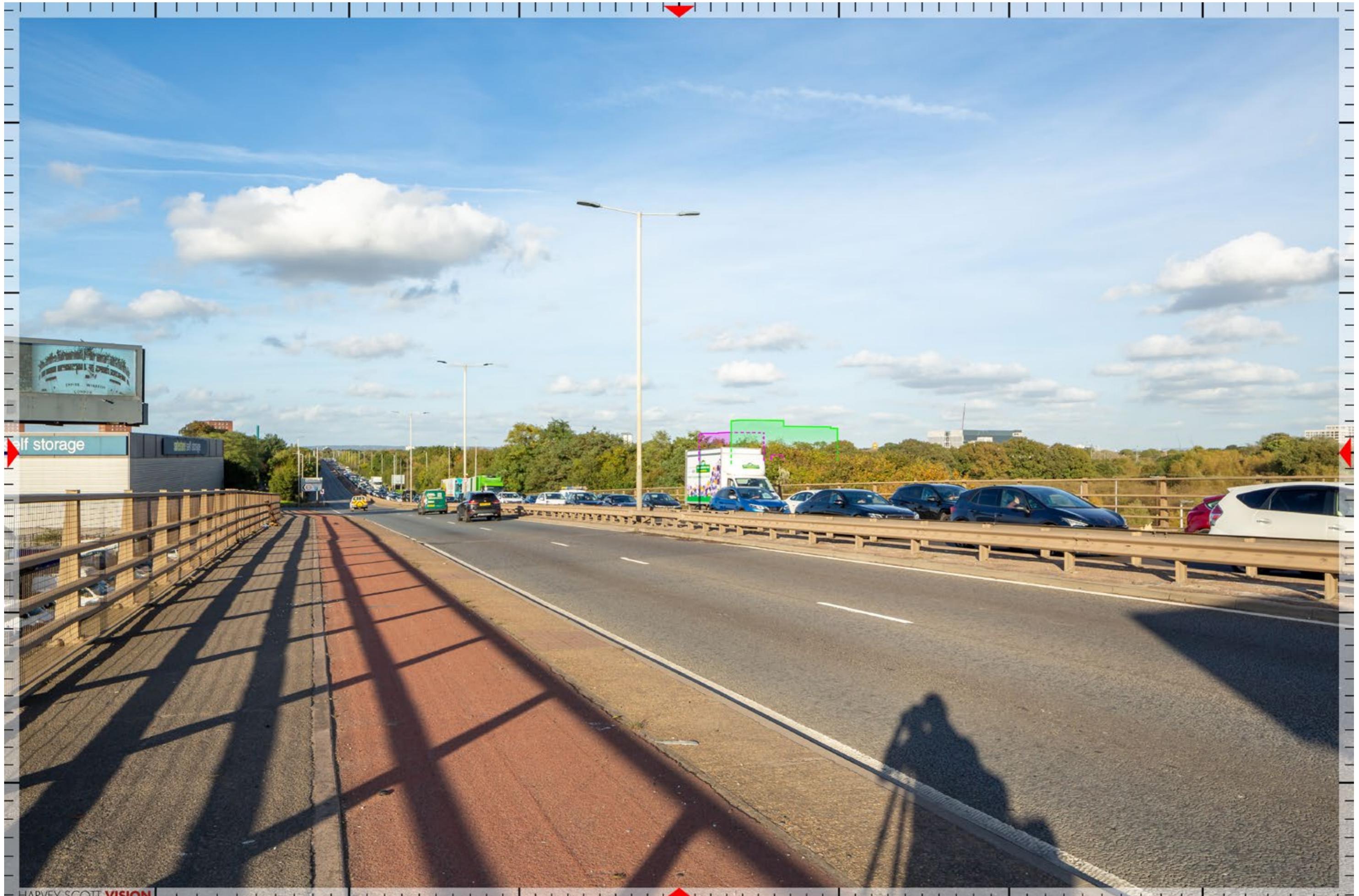
3.31 The Hillingdon Townscape Character Study is an evidence-base document published to inform the development of the new Local Plan. The contents of this document is intended to inform this new Local Plan and is not to be used as a tool to assess proposed developments. Nevertheless, this document has been referred to in the forthcoming assessment to establish a baseline understanding of the Site's context, in line with that of LB Hillingdon.

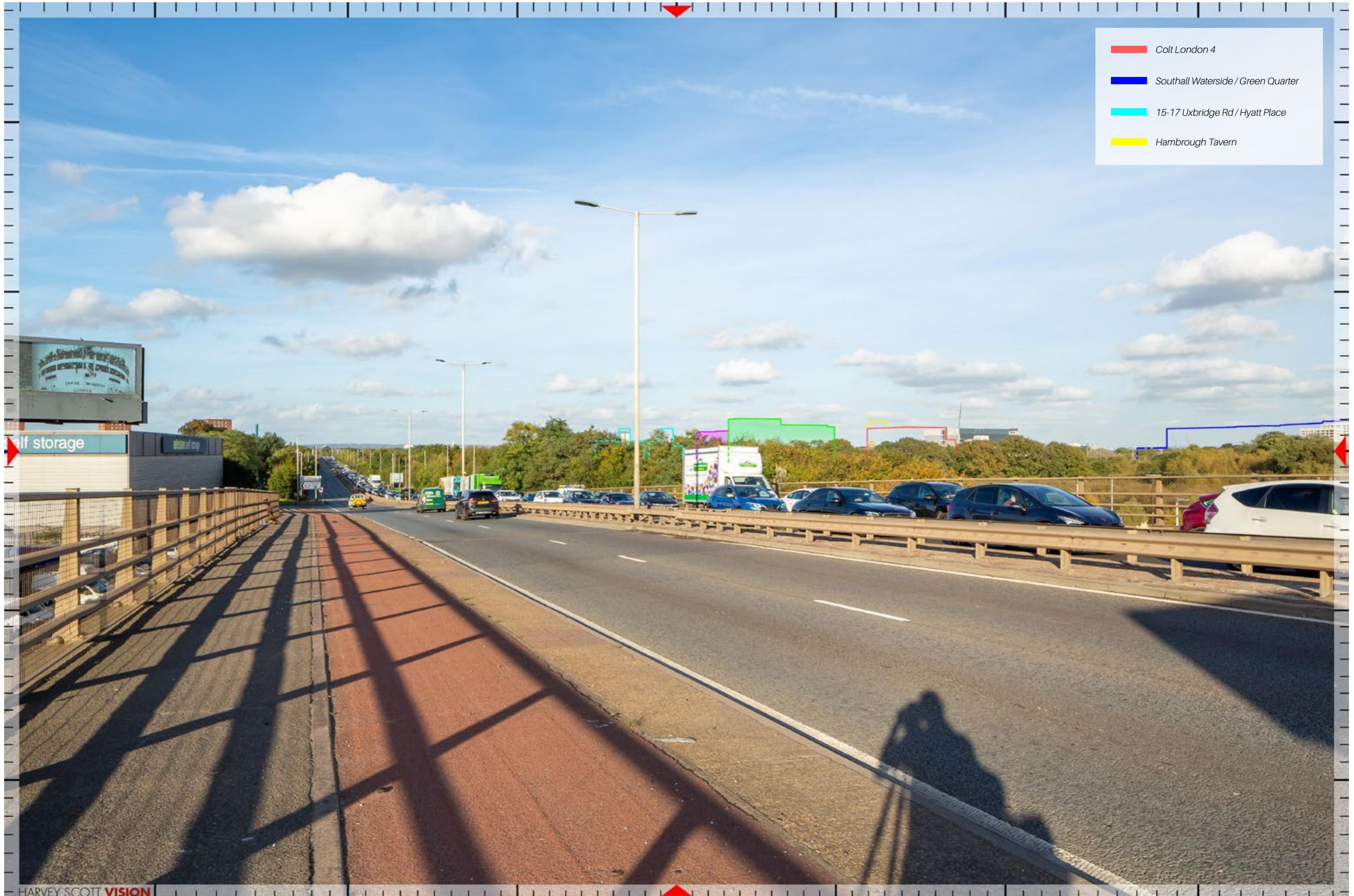
Appendix 3

# **Accurate Visual Representations (AVRs).**



Viewpoint 1 | Existing







HARVEY SCOTT VISION

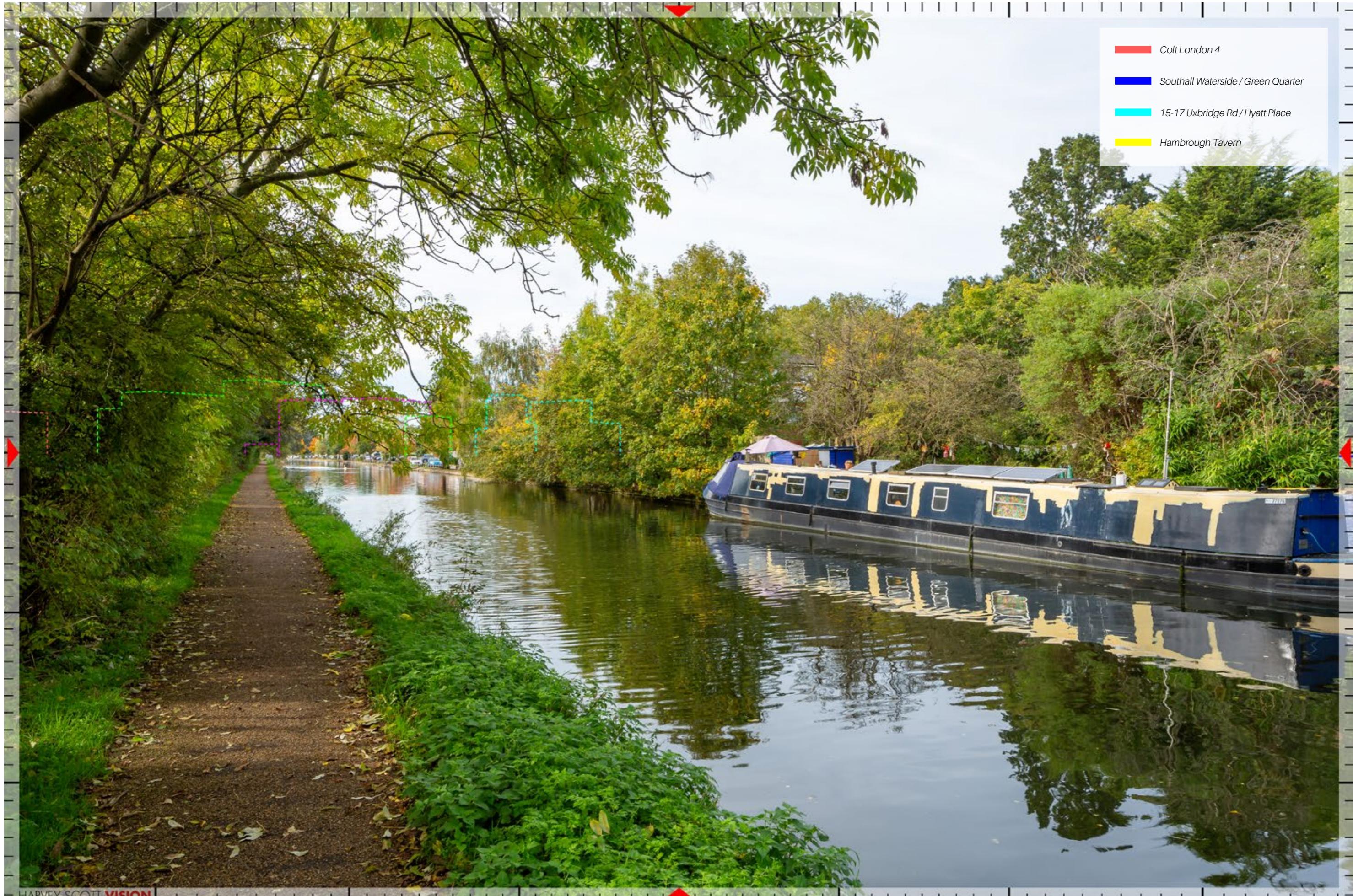
Viewpoint 2 | Existing



Supplementary HTVIA Technical Note | 25



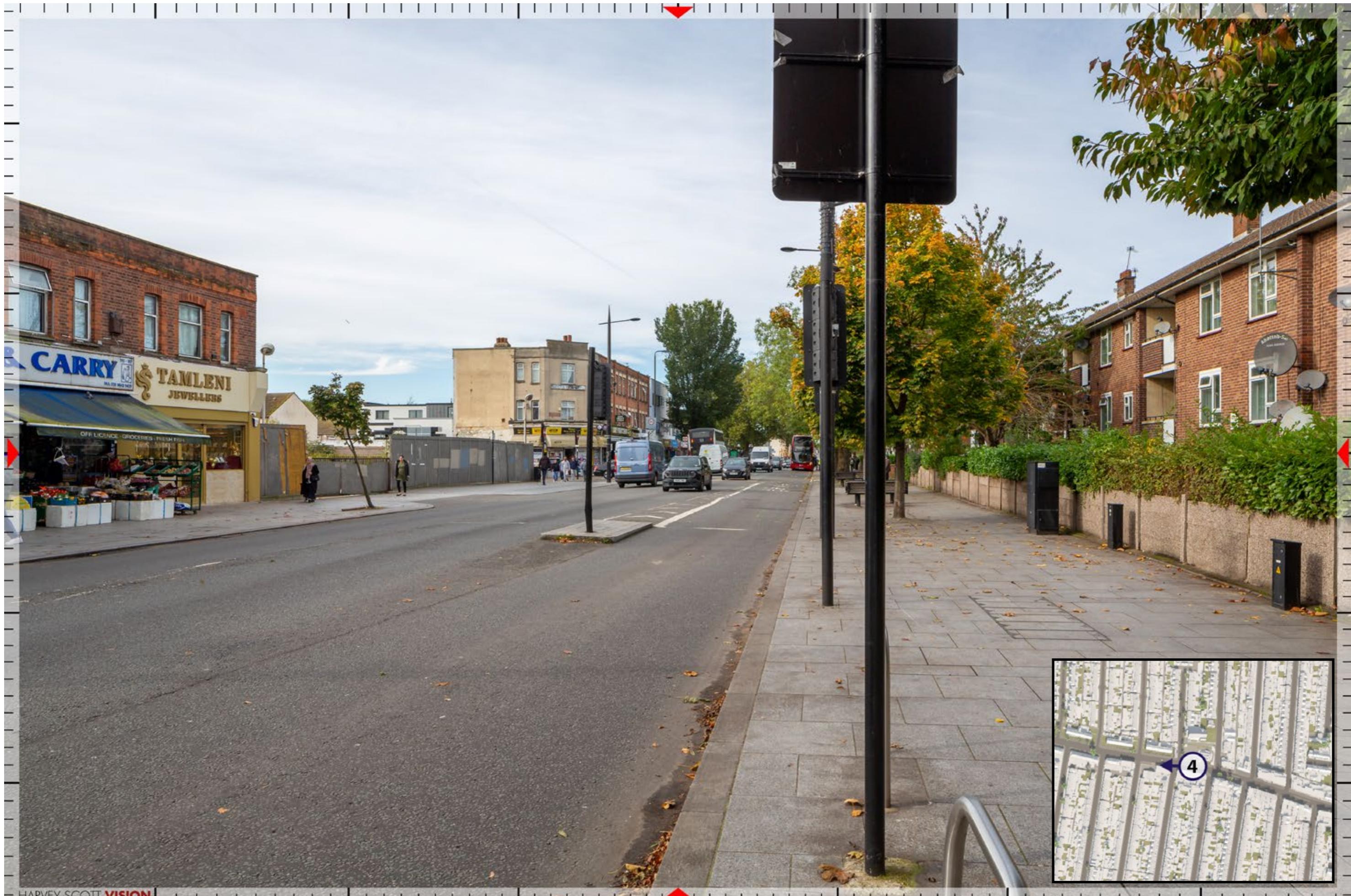
Viewpoint 2 | Proposed

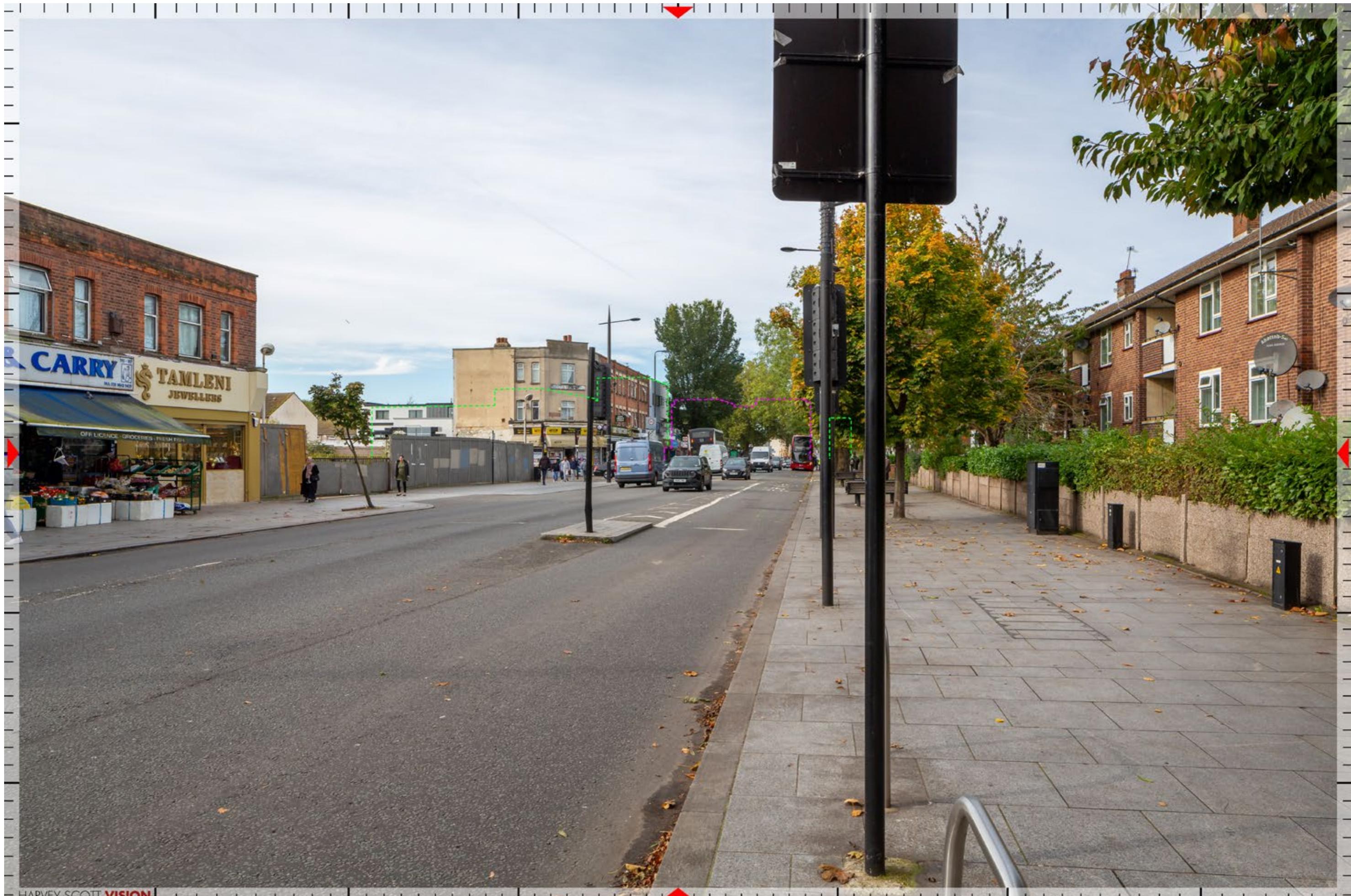




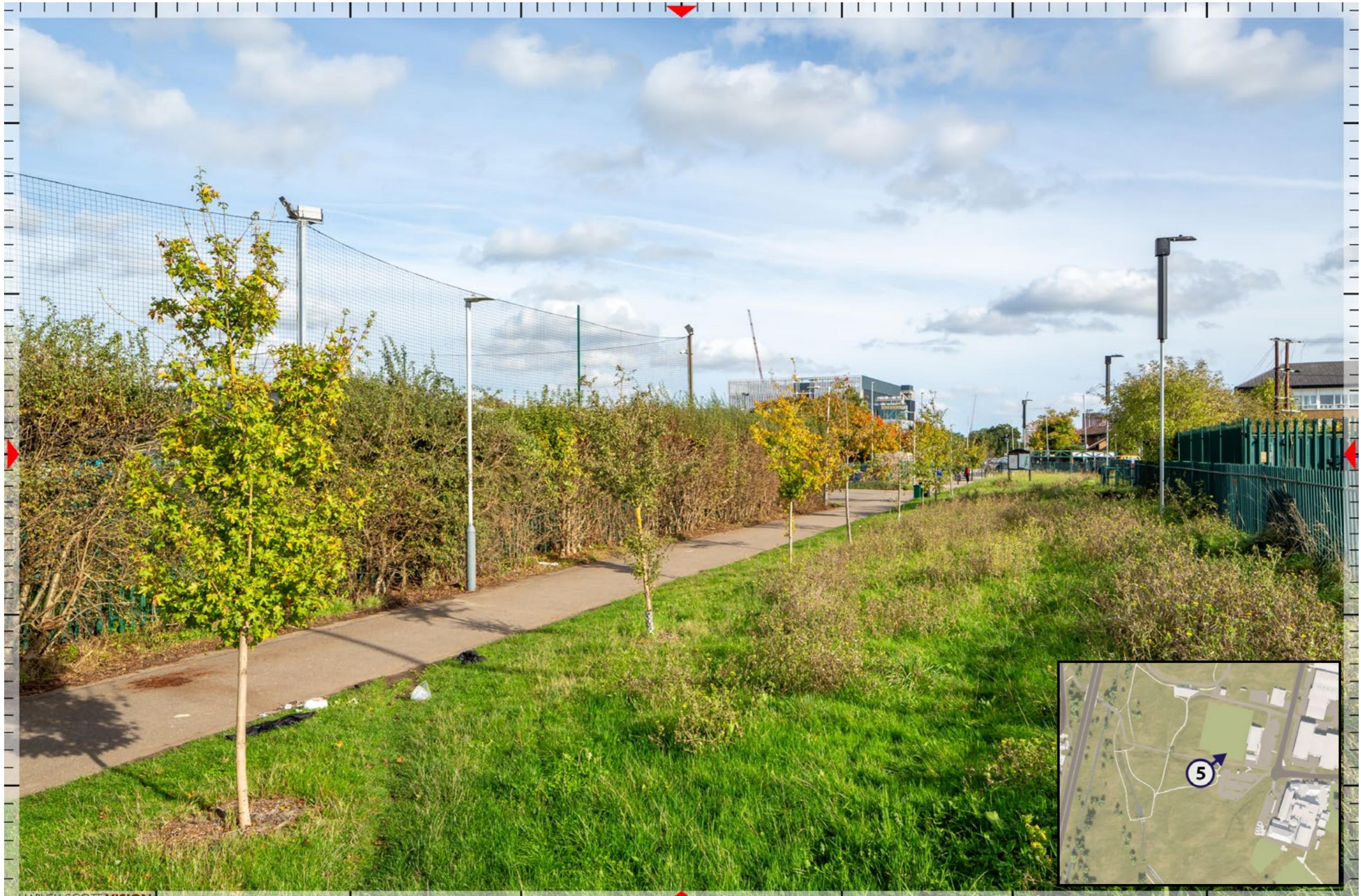


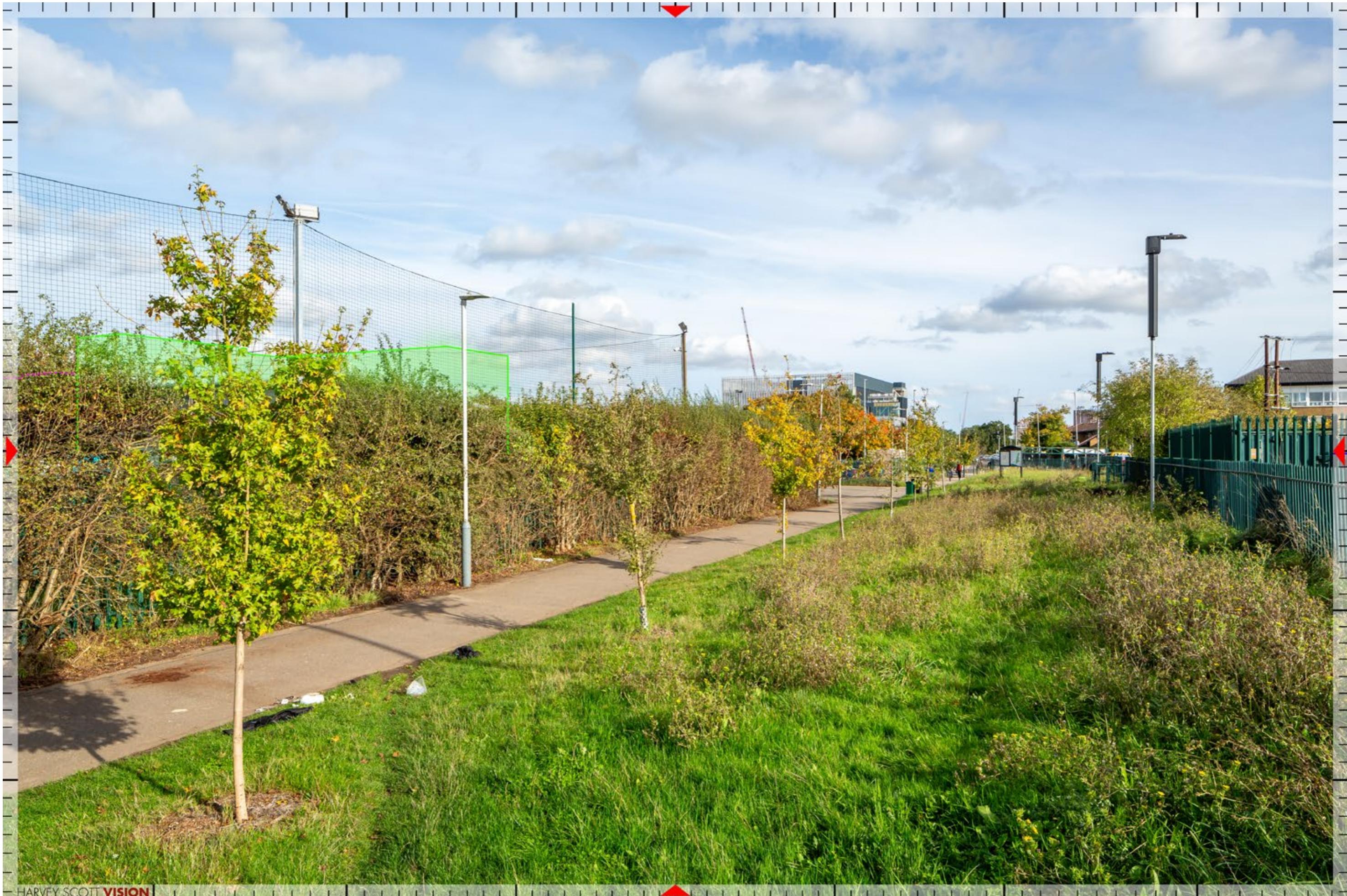


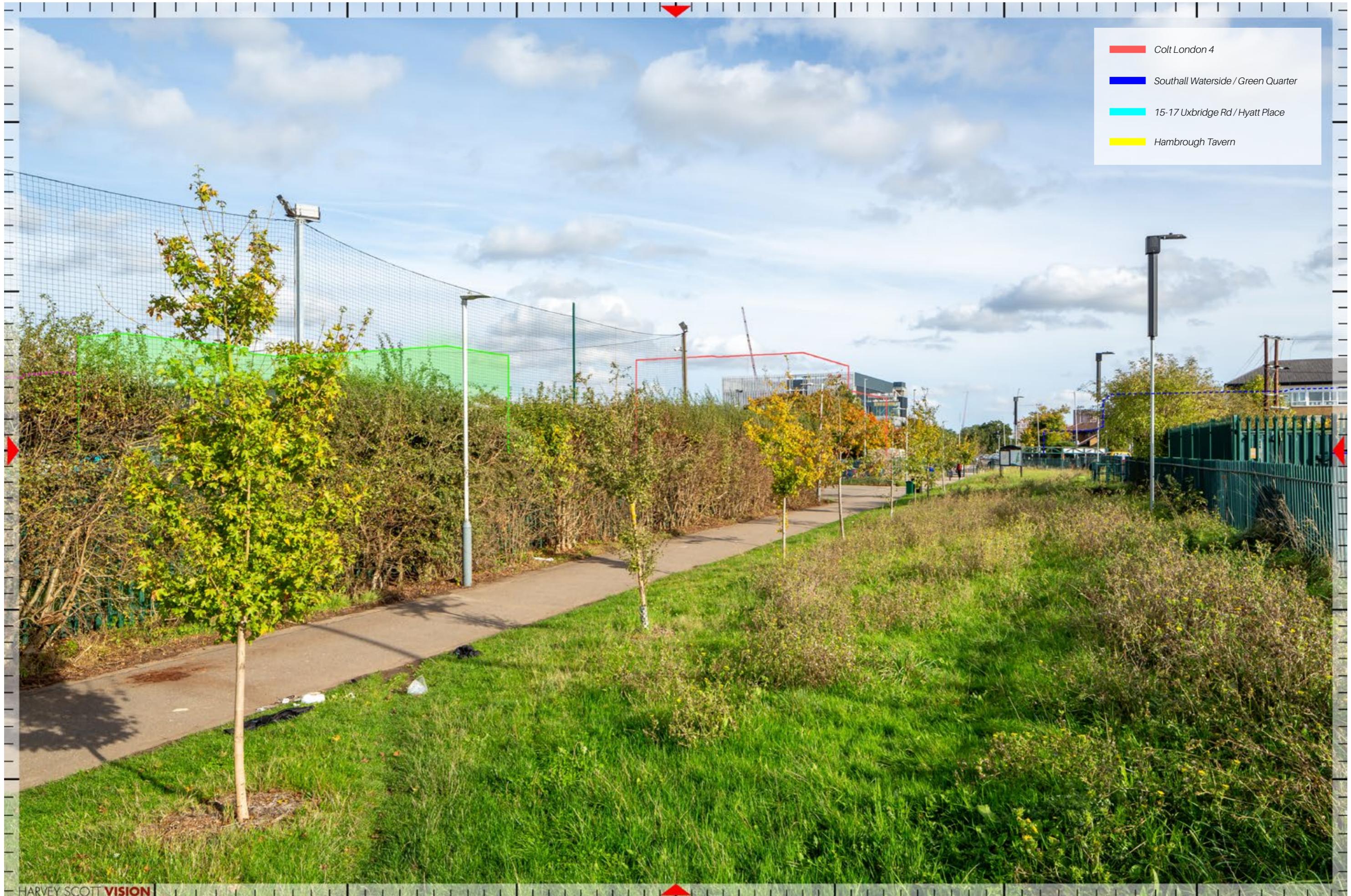






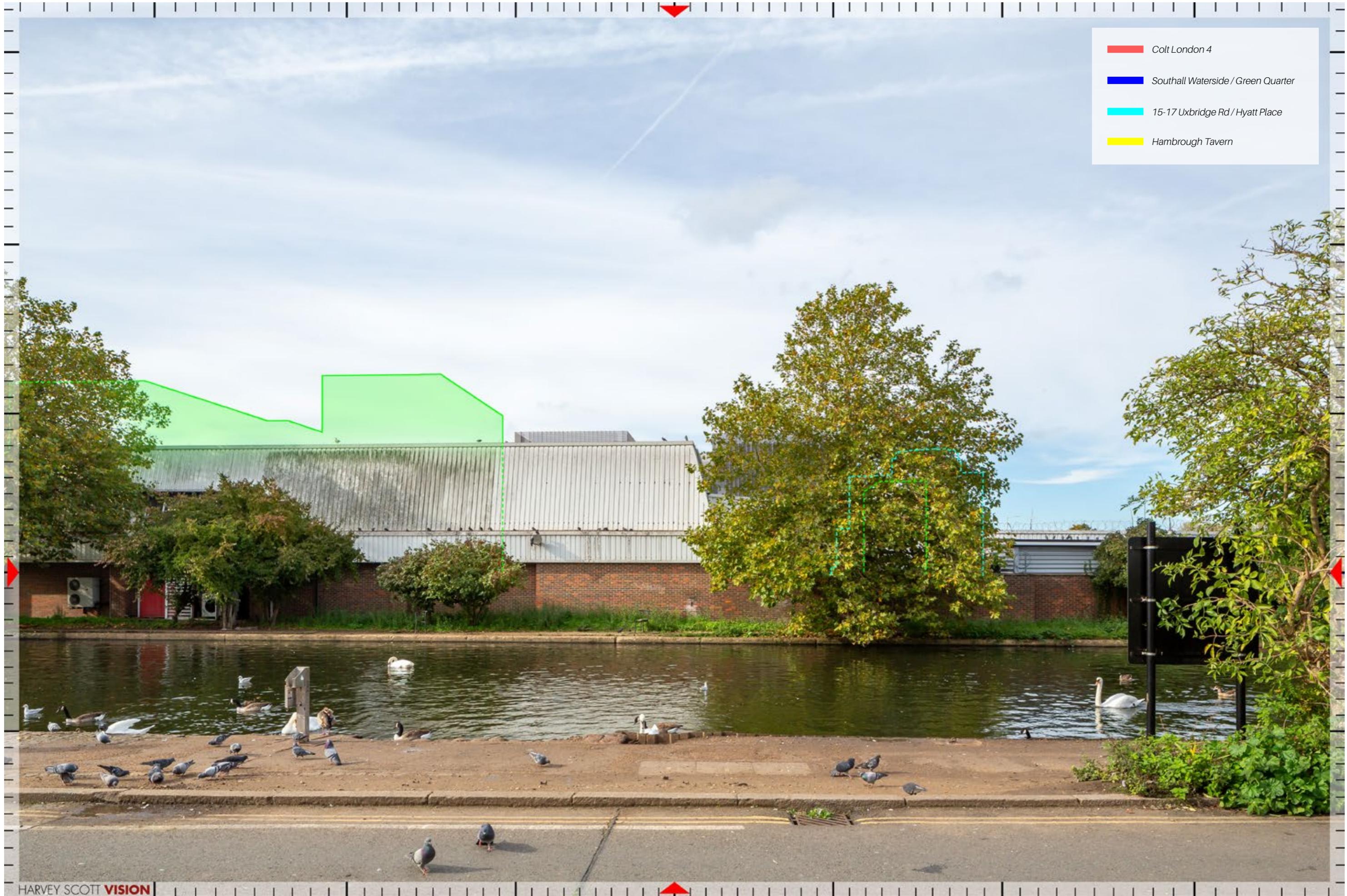


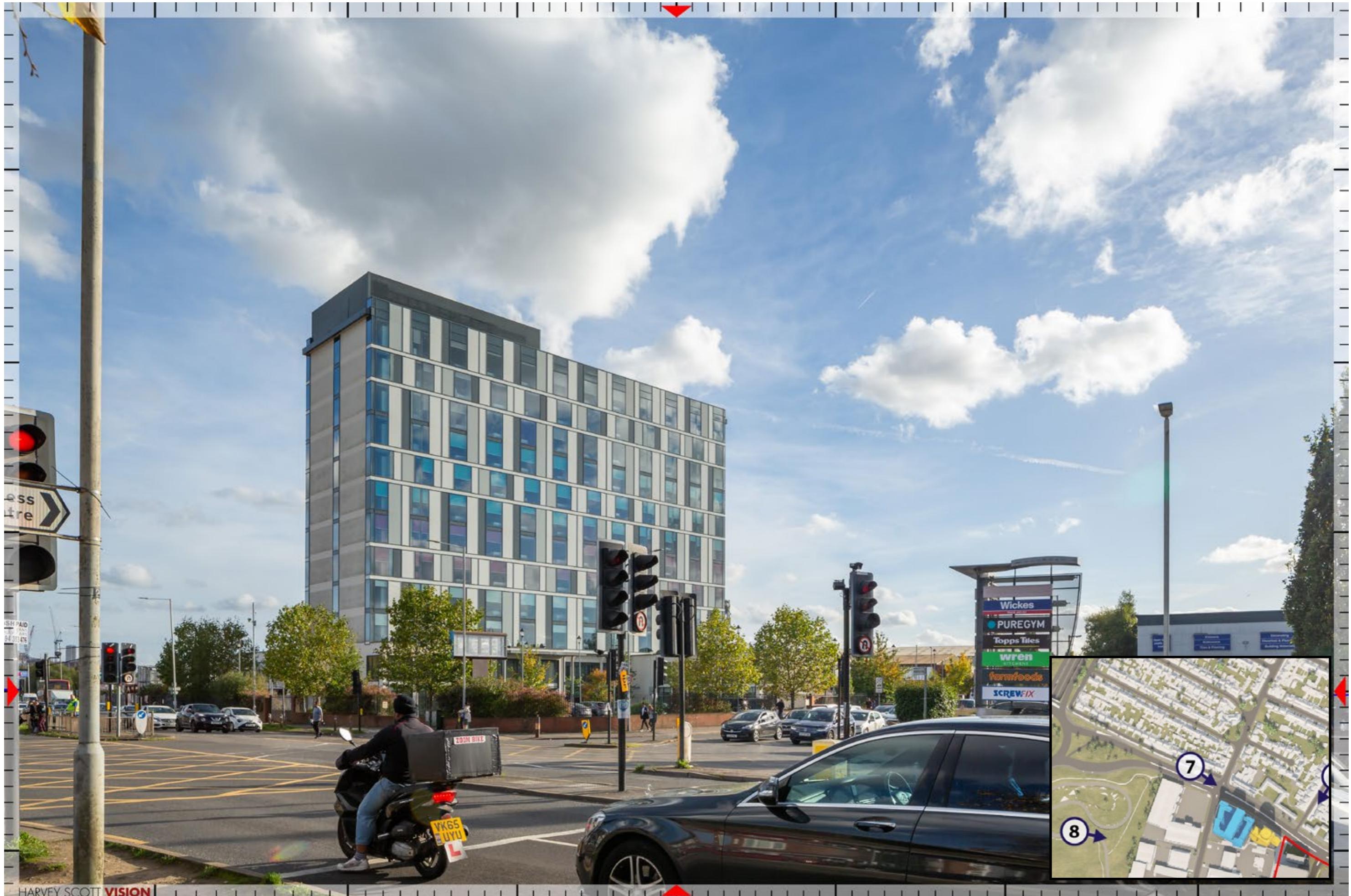








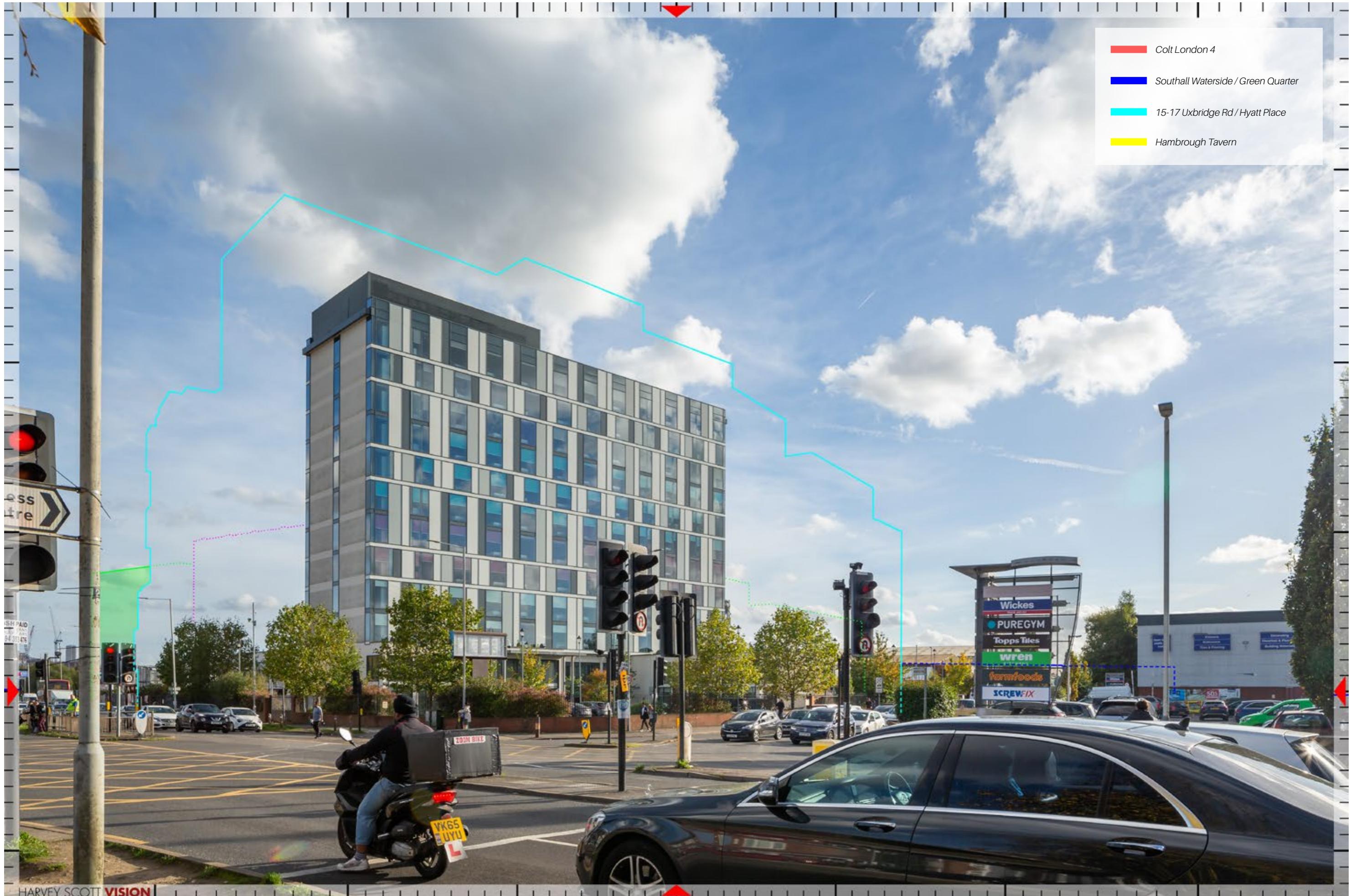


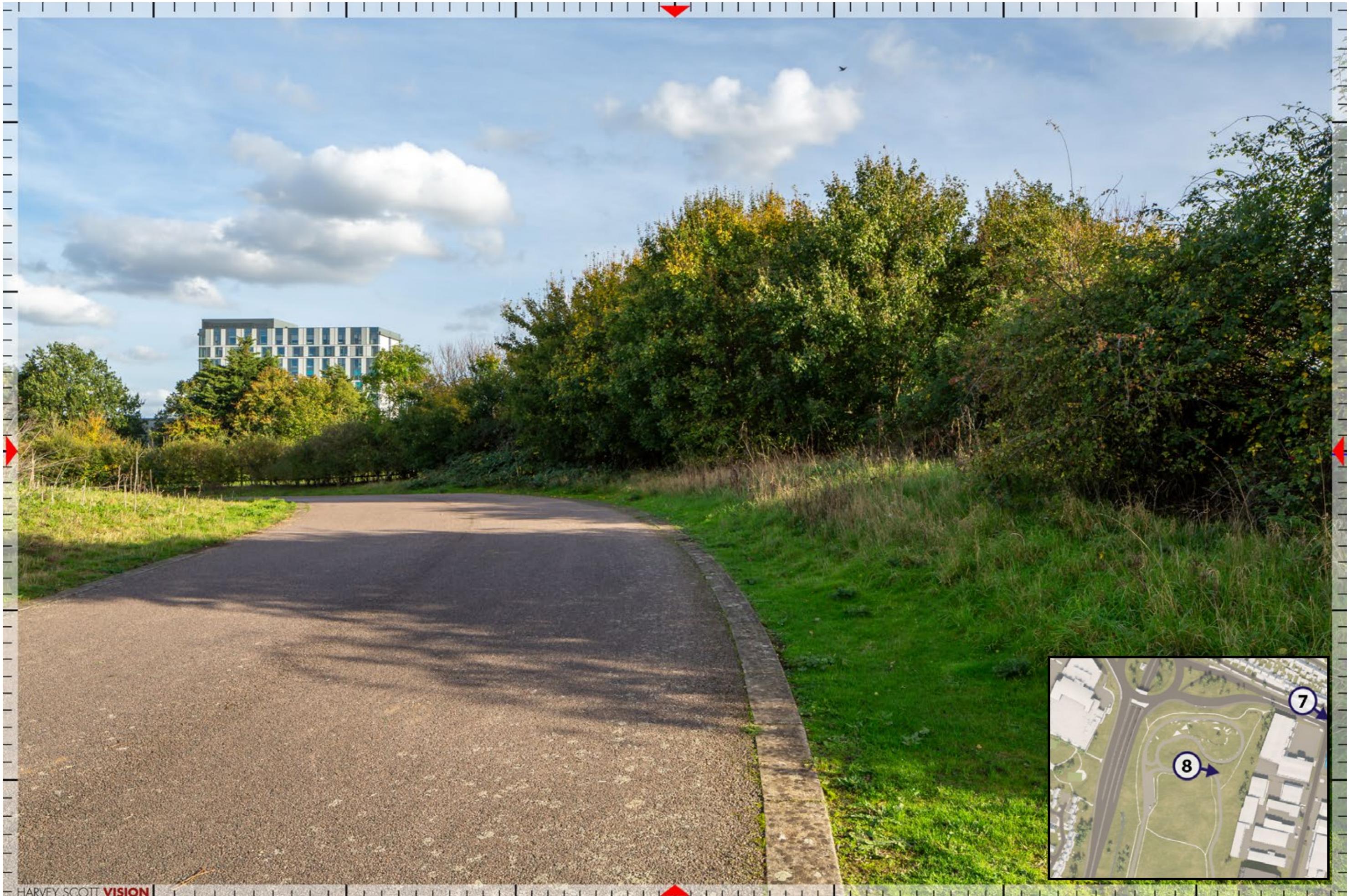


Viewpoint 7 | Existing

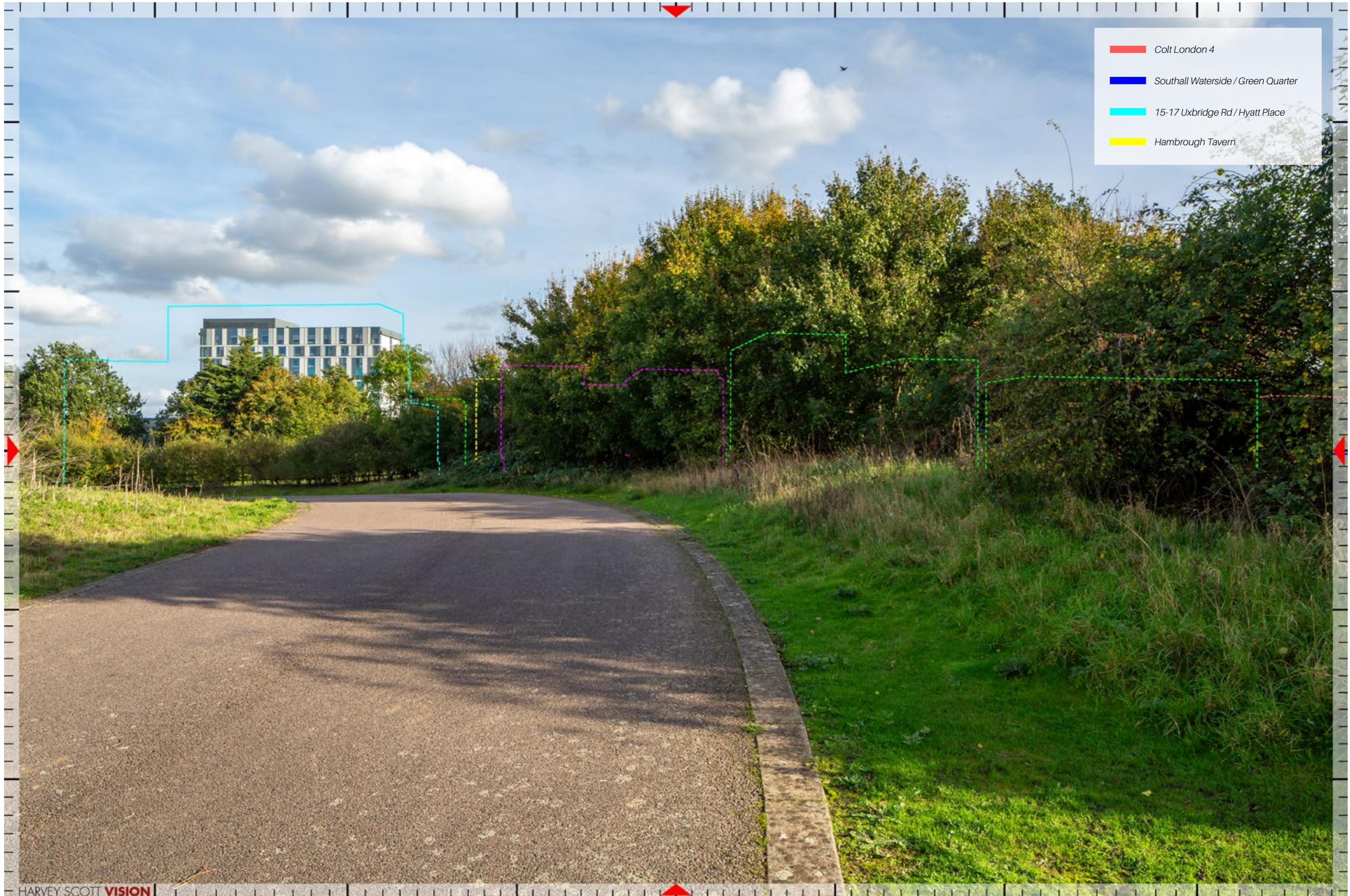


Viewpoint 7 | Proposed





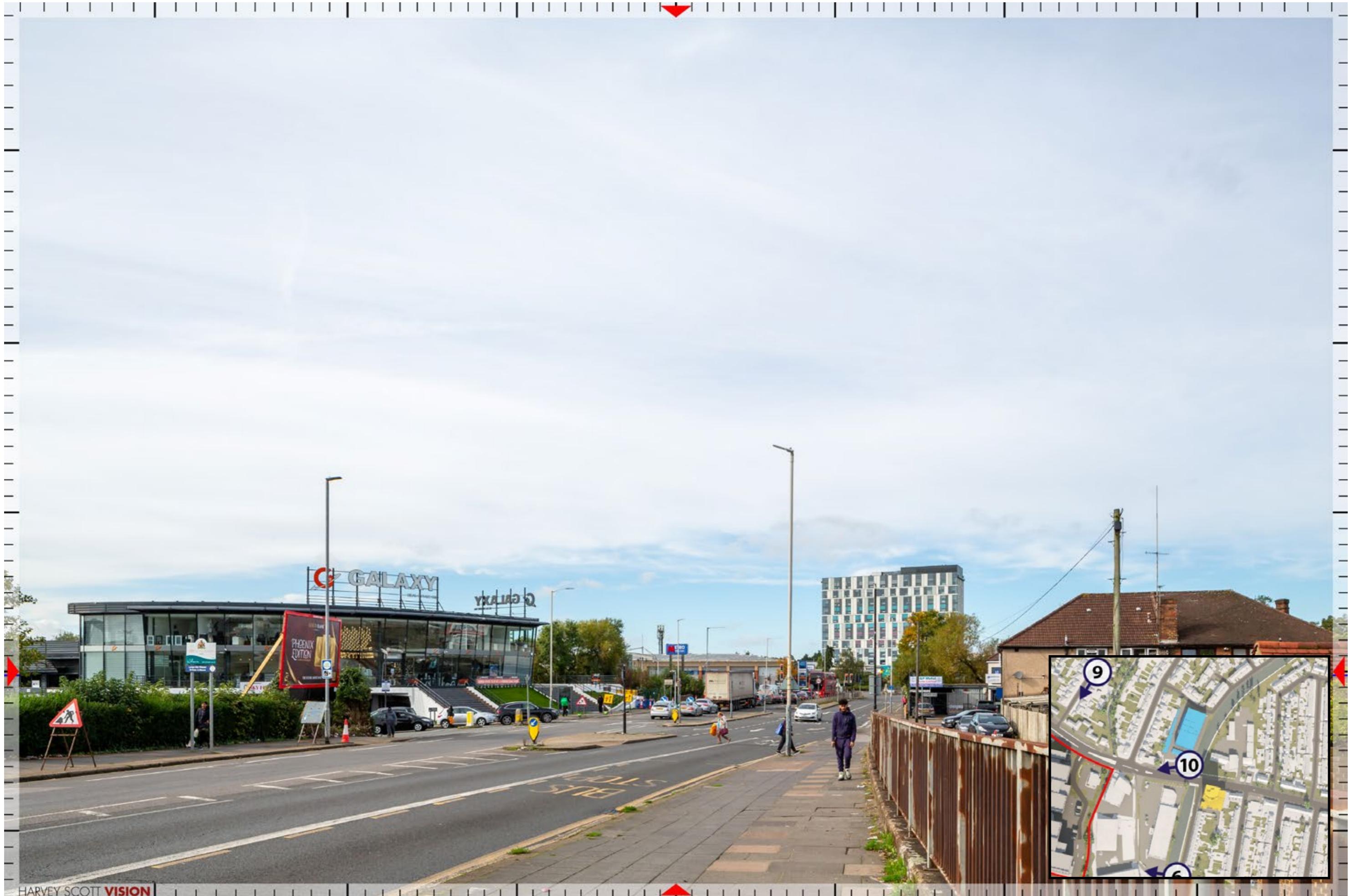












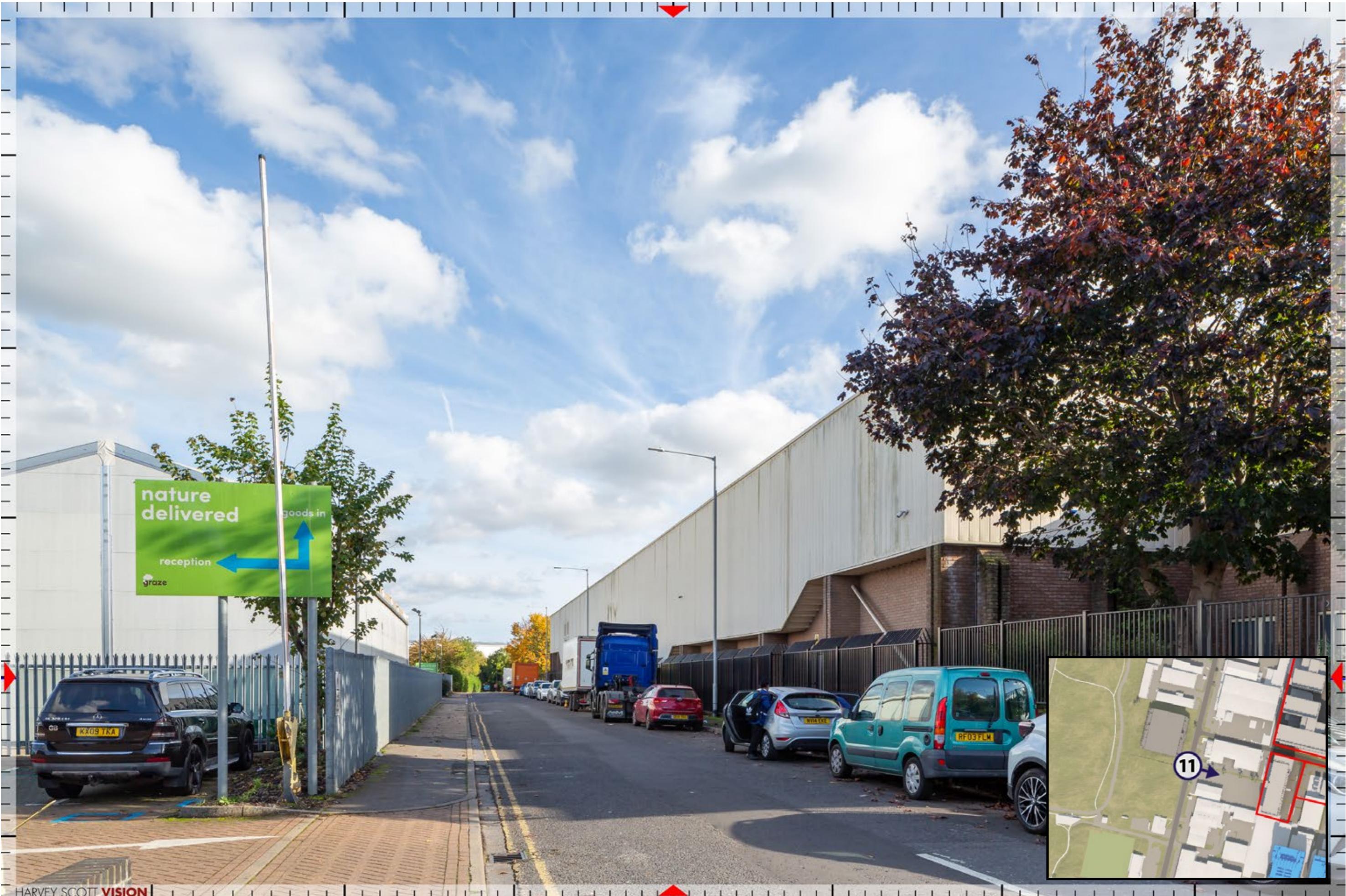
HARVEY SCOTT VISION

Viewpoint 10 | Existing

Supplementary HTVIA Technical Note | 49







Viewpoint 11 | Existing





Appendix 3

# **Visualisation Methodology Statement.**



Delivery | Design | Engagement | Heritage | Impact Management | Planning  
Sustainable Development | Townscape | Transport

**Edinburgh:** 11 Alva Street | Edinburgh | EH2 4PH

**Glasgow:** 177 West George Street | Glasgow | G2 2LB

**London:** Da Vinci House | 44 Saffron Hill | London | EC1N 8FH

**Manchester:** This is The Space | 68 Quay Street | Manchester | M3 3EJ

**Birmingham:** The Colmore Building | 20 Colmore Circus Queensway | Birmingham | B4 6AT

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