

HYDE PARK HAYES

PLANNING STATEMENT

25 JULY 2025



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EXECUTIVE SUMMARY

1. This Planning Statement has been prepared in support of an Outline Planning Application (with all matters reserved except for access) submitted on behalf Columbia Threadneedle Investments (“the Applicant”) and proposing the redevelopment ‘Hyde Park, Hayes’, London, UB3 4AZ (‘the Site’). This application follows extensive pre-application engagement with the London Borough of Hillingdon (LBH) and officers within the GLA.

2. The description of development (i.e. relating to the ‘Proposed Development’ or “the Proposals”) is as follows:

“Outline planning permission (with all matters reserved excluding access) for demolition of existing buildings (above basement level) and phased delivery of residential development (Class C3), flexible residential / commercial floorspace, new public realm, landscaping, play space, car parking, cycle parking and associated works.”

3. The Site is located in the Hayes area, in a highly accessible location and comprising an irregularly shaped landholding within the Hyde Park estate on Millington Road.
4. The Site is currently occupied by 2no. office buildings, a surface car parking area and a multistorey car park (‘MSCP’) providing 696 existing car parking spaces. The existing office buildings and MSCP are 3 to 5-storeys in height and provide circa 31,288m² of Class E floorspace.
5. The Site is bounded by North Hyde Road to the north and the Westlands Estate (including the Asda Hayes Superstore and Selco Warehouse) to the east. The Site’s southern boundary runs along Millington Road. The Site’s western boundary, also comprising part of Millington Road, provides connection with a large roundabout to the west (which is also benefits from exits on to Dawley Road, Bourne Avenue and North Hyde Road).
6. Off-site, the wider Hyde Park Estate also includes Building ‘HPH 1’ (currently occupied by a commercial occupier at ground floor and benefitting from Prior Approval for conversion to residential use on upper floors), Buildings ‘HPH3’ and ‘HPH5’ and a Premier Inn. To confirm, Buildings HPH3 and HPH5 have either been converted to residential use or are in the process of being redeveloped. As such, the immediately surrounding estate is changing to a more residential-led character.
7. The wider surrounding area is also importantly undergoing a period of transition, with several large-scale mixed use / residential-led redevelopment projects consented and / or being delivered locally. These include (but are not limited to): Weston Homes redevelopment proposals at ‘The Venue’, the redevelopment of the nearby Yodel site, the Nestle Square redevelopment project, Barratt London’s Hayes Village redevelopment project, Berkeley Homes’ Green Quarter redevelopment scheme, Greystar’s Crown Trading Centre redevelopment scheme and the Borough’s own redevelopment proposals at the Austin Road Estate.
8. The Proposals include demolition of existing buildings (above basement level) and seek outline planning permission for the development of the Site to deliver significant dwellings, alongside areas of car parking, landscaping, play space and associated works. At this stage, we envisage the Site being able to deliver up to 673 dwellings (with the maximum number of homes deliverable envisaged to be secured via planning condition in due course).
9. Approval of access is sought in detail at this stage, with all other matters reserved. In addition, an ‘Illustrative Scheme’ has been prepared and submitted as part of this application (totally 652 residential units) to demonstrate how a residential-led development of the scale and nature proposed via the proposed outline parameters can be suitably accommodated (albeit the specific scale, quantum and design of any detailed proposals in due course will be subject to separate Reserved Matters approvals in due course).

10. As set out in the submitted Financial Viability Assessment, prepared by Montagu Evans, the viability of the Proposed Development is very compromised, and currently the delivery of any affordable housing on-site would be significantly challenging. However, the Applicant is in the process of discussing the viability position (and options / next steps concerning affordable housing) with Borough officers, and the Council's independent third-party viability reviewer.
11. The submitted Parameter Plans, and Design Code are informed by key site opportunities and considerations, in addition to the suite of technical assessments forming part of this application.
12. The submitted Parameter Plans propose the following matters for approval:
 - Parameter Plan 1 – defines the maximum building footprint and identifies the “Proposed “Development Zone”.
 - Parameter Plan 2 – outlines areas for vehicular access, vehicle parking, pedestrian friendly zones, and new pedestrian crossings.
 - Parameter Plan 3 – shows the areas designated as public realm and streetscape, private front gardens and illustrative locations of public open space.
 - Parameter Plan 4 – sets out the maximum building heights within each zone (67.9m AOD maximum).
 - Parameter Plan 5 – illustrates the land use, majority residential Use Class C3 with a small section for flexible commercial space Use Class E.
 - Parameter Plan 6 – outlines the existing trees to be retained, trees to be removed and the proposed tree planting.
13. Whilst detailed design proposals will be submitted in due course under a separate Reserved Matters Application (“RMA”), a robust Design Code has been submitted as part of the current application – establishing a comprehensive design-related framework which should underpin the design of RMA proposals in the future.

Key Benefits of the Scheme

14. We have identified that the Proposed Development accords with key statutory development plan and national planning policies and guidance. It also comprises a sustainable form of development that would give rise to considerable social and environmental benefits to be factored into the overall planning balance including:
 - Delivery of significant and much-needed new housing on a highly-accessible, previously-developed site – in short, given that up to 673 residential dwellings are proposed to be delivered on-site, the Proposals are capable of making an undeniable contribution to local housing need.
 - Delivery of flexible ancillary residential / commercial uses at ground level at key-locations on-site, in addition to securement of other means of active frontage throughout the proposals. This approach will help to ensure a strong sense of place and street scheme throughout the scheme.
 - The securing of high-quality architecture in the future, at Reserved Matters stage, through establishment of robust design coding. The submitted Design Code provides a comprehensive framework to inform future redevelopment proposals.
 - The submitted Parameter Plans and Design Code will also ensure, and underpin, the delivery of high-quality and well-designed new homes on-site – as demonstrated through submission of our Illustrative Scheme, these parameters and design principles are capable of delivering an exemplary scheme at Reserved Matters stage

which performs well in relation to key design and environmental criteria (including wind microclimate and daylight, sunlight and overshadowing considerations).

- The proposals provide local employment and training opportunities through the flexible commercial unit proposed, there will also be opportunity for employment through temporary construction work. The proposals will therefore result in local economic benefits.
 - A significant reduction in car parking provision on-site, in accordance with key policy objectives. The proposals will also include 1,210 cycle parking spaces, therefore helping to promote sustainable transport modes.
 - The proposals will deliver significant new, accessible and permeable public realm through the Site, promoting pedestrian priority. The outline proposals are supported by a detailed landscaping strategy, seeking to ensure a high-quality landscaped approach in the future.
 - As supported by our Illustrative Scheme, the maximum parameters proposed are capable of delivering up to play 1,752m² child's play space (with specific details to come forward at Reserved Matters Application stage in due course).
15. Given the above suite of associated benefits, and the undeniable high-quality of the proposed scheme, we consider that the Proposed Development should be supported.

1.0 INTRODUCTION

- 1.1. This Planning Statement has been prepared on behalf of Columbia Threadneedle Investments (“the Applicant”) by Montagu Evans to assist in the consideration and determination of an Outline Planning Application (“the Application”). The Application seeks Outline planning permission for the redevelopment of Hyde Park, Hayes UB3 4AZ (“the Site”).

OVERVIEW OF SCHEME PROPOSALS

- 1.2. Outline planning permission is sought for the following Proposed Development:

“Outline planning permission (with all matters reserved excluding access) for demolition of existing buildings (above basement level) and phased delivery of residential development (Class C3), flexible residential / commercial floorspace, new public realm, landscaping, play space, car parking, cycle parking and associated works.”

- 1.3. The Proposed Development comprises delivery of the following key elements:

- Demolition of existing buildings (above basement level – as the basement car parking level below Building HPH5 is proposed to be retained);
- Delivery of a high quality residential-led redevelopment scheme
- Delivery of significant new landscaping and public realm; and
- Provision of cycle parking and car parking provision on-site.

- 1.4. It is envisaged that the maximum number of homes deliverable on-site (in our view, up to 673 new homes, will be reserved via planning condition in due course). To sense-check the robustness of the currently submitted outline parameters and design coding / principles, an illustrative scheme has been submitted as part of this application, demonstrating one of the way that the Site could potentially be redeveloped in the future. The Illustrative Scheme essentially allows the robustness and effectiveness of the Parameter Plans and Design Code to be ‘sense checked’ against relevant planning policy requirements and other material considerations.

- 1.5. This application submission follows extensive pre-application consultation with the Local Planning Authority (LPA), Greater London Authority (GLA), Design Review Panel (DRP) and other wider stakeholders. Further details regarding pre-application engagement are set out at **Section 3.0**.

APPLICATION FORMAT

- 1.6. This Application seeks Outline Planning Permission, with all matters reserved aside from access. A series of Parameter Plans and a Design Code are submitted for approval in support of this application. These establish the proposals’ parameters in terms of land use, height, key routes and the broad location / layout of future buildings on-site. To confirm, the following Parameter Plans are submitted for approval:

- Parameter Plan 1 - Building Zones (drawing ref: A12440 TPB ZZ ZZZ DR A 041001 S2 P04);
- Parameter Plan 2 - Access and Movement (drawing ref: A12440 TPB ZZ ZZZ DR A 041002 S2 P04);

- Parameter Plan 3 - Hard and Soft Landscape (drawing ref: A12440 TPB ZZ ZZZ DR A 041003 S2 P03);
- Parameter Plan 4 - Building Heights (drawing ref: A12440 TPB ZZ ZZZ DR A 041004 S2 P03);
- Parameter Plan 5 - Land Use (drawing ref: A12440 TPB ZZ ZZZ DR A 041005 S2 P03);
- Parameter Plan 6 – Trees (drawing ref: A12440 TPB ZZ ZZZ DR A 041006 S2 P03);
- Parameter Plan 3D – Max Building Heights (drawing ref: A12440 TPB ZZ ZZZ DR A 041007 S2 P01);

1.7. As set out previously, the Parameter Plan are accompanied by a Design Code document, in addition to an 'Illustrative Scheme' for officer consideration.

KEY SCHEME BENEFITS

1.8. The Proposals include the following:

- Delivery of significant and much-needed new housing on a highly-accessible, previously-developed site – in short, given that up to 673 residential dwellings are proposed to be delivered on-site, the Proposals are capable of making an undeniable contribution to local housing need.
- Delivery of flexible ancillary residential / commercial uses at ground level at key-locations on-site, in addition to securement of other means of active frontage throughout the proposals. This approach will help to ensure a strong sense of place and street scheme throughout the scheme.
- Creation of high-quality architecture in the future, at Reserved Matters stage, through establishment of robust design coding. The submitted Design Code provides a comprehensive framework to inform future redevelopment proposals.
- The submitted Parameter Plans and Design Code will also ensure, and underpin, the delivery of high-quality and well-designed new homes on-site – as demonstrated through submission of our Illustrative Scheme, these parameters and design principles are capable of delivering an exemplary scheme at Reserved Matters stage which performs well in relation to key design and environmental criteria (including wind microclimate and daylight, sunlight and overshadowing considerations).
- The proposals provide local employment and training opportunities through the flexible commercial unit proposed, there will also be opportunity for employment through temporary construction work. The proposals will therefore result in local economic benefits.
- A significant reduction in car parking provision on-site, in accordance with key policy objectives. The proposals will also include 1,210 cycle parking spaces, therefore helping to promote sustainable transport modes.
- The proposals will deliver significant new, accessible and permeable public realm through the Site, promoting pedestrian priority. The outline proposals are supported by a detailed landscaping strategy, seeking to ensure a high-quality landscaped approach in the future.
- As supported by our Illustrative Scheme, the maximum parameters proposed are capable of delivering up to play 1,752m² child's play space (with specific details to come forward at Reserved Matters Application stage in due course).

PURPOSE AND FORMAT OF THE PLANNING STATEMENT

- 1.9. The purpose of this Planning Statement is to assess the Proposals in relation to key planning policies and other material considerations. This Planning Statement should also be read in conjunction with the suite of other documents and assessments submitted in support of this application (and a list of these is detailed on the accompanying covering letter).
- 1.10. The remainder of this Planning Statement comprises the following sections:
- Chapter 2 – Site and Surroundings
 - Chapter 3 – Proposed Development
 - Chapter 4 – Planning Policy Framework
 - Chapter 5 – Planning Policy Assessment
 - Chapter 6 – Summary and Conclusion

2.0 SITE AND SURROUNDINGS

- 2.1. This Section describes the application site ("the Site") and its context, including an overview of the planning history of the Site and the surrounding area.

THE SITE

- 2.2. The Site is located in the Hayes area, within Hillingdon's Pinkwell Ward, and comprises an irregularly shaped landholding within the Hyde Park Estate on Millington Road. The Site is currently occupied by 2no. office buildings, a surface car parking area and a multistorey car park ('MSCP') providing 696 existing car parking spaces. The existing office buildings and MSCP are 3 to 5-storeys in height and provide circa 31,288m² of Class E floorspace.
- 2.3. The Site is bounded by North Hyde Road to the north and the Westlands Estate (including the Asda Hayes Superstore and Selco Builders Warehouse) to the east. The Site's southern boundary runs alongside the southern edge of Millington Road. The Site's western boundary, also comprising part of Millington Road, provides connection with a large roundabout (which is also benefits from exits on to Dawley Road, Bourne Avenue and North Hyde Road).
- 2.4. Whilst the Site comprises existing commercial uses (alongside car parking), it notably abuts 2no. adjacent development plots – commonly referred to as 'HP3' and building 'HP4'. These plots currently benefit from either planning permission or Prior Approval to deliver residential uses in the future (under Refs: 72360/APP/2021/1709 and 76655/APP/2021/3039 respectively).
- 2.5. Building 'HPH1' (which is located to the immediate east and is also included within the Applicant's ownership) benefits from Prior Approval granted on 11 April 2025 for Change of use from offices (Use Class E) to residential (Use Class C3) on upper floors to create 75no. self-contained flats (LPA Ref. 67351/APP1202412746). Building HPH1 is currently occupied by a commercial tenant at ground floor level.
- 2.6. The Site has strong levels of public transport accessibility given the presence of various local rail and bus services. As such, the Site has a Public Transport Accessibility Level of 4 (good). The Site also lies in proximity of the M4 (which lies circa 850m to the south) and Heathrow Airport (2.6km to the south).
- 2.7. The character of the surrounding area is mixed use: the adjacent Westlands Estate comprises a mixture of industrial and retail uses, whereas various terraced and semi-detached residential premises can be found locally to the north (on the opposite side of North Hyde Road), to the east (beyond Station Road) and to the south-west (on Dawley Road).
- 2.8. The wider surrounding area is also importantly undergoing a period of transition, with several large-scale redevelopment projects consented and / or being delivered locally. These include (but are not limited to): Weston Homes redevelopment proposals at 'The Venue', the redevelopment of the nearby Yodel site, the Nestle Square redevelopment project, Barratt London's Hayes Village redevelopment project, Berkeley Homes' Green Quarter redevelopment scheme, Greystar's Crown Trading Centre redevelopment scheme and the Borough's own redevelopment proposals at the Austin Road Estate.

LOCAL HERITAGE CONSIDERATIONS

- 2.9. The Site does not comprise any listed buildings and it is not located in a Conservation Area. The nearest Conservation Area is the Botwell: Thorn EMI, Conservation Area to the North of the Site across from the railway line. The Botwell Nestle

Conservation Area is further East along Nestles Avenue. The Site falls within Flood Zone 1 (i.e. lowest probability of flooding). There are no Tree Preservation Orders (TPOs) on the Site.

ON-SITE PLANNING HISTORY

- 2.10. A search of London Borough of Hillingdon's (LBH) online records reveals the following planning history for the Site outlined in the table below:

LPA Ref.	Proposal	Decision	Date
67351/APP1202412746	Change of use from offices (Use Class E) to residential (Use Class C3) to create 75no. self-contained flats under Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)	Approval	11 April 2025
67351/APP/2024/2617	Removal of external metal framework system from existing office facade and associated works	Approval	10 January 2025
67351/ADV/2019/32	Installation of LED signage behind the front glazing	Approval	18 June 2019
67351/APP/2019/1681	Application for a non-material amendment to planning permission Ref: 67351/APP/2018/610 dated 13/04/2018 (New entrance enclosure to north elevation, installation of ramp and associated alterations to south elevation, roof terrace and alterations to building facade) to allow the existing cladding panels to be painted grey	Approval	17 May 2019
67351/APP/2019/1449	Details pursuant to condition 4 (Landscape Scheme) of planning permission Ref: 67351/APP/2018/610 dated 13/04/2018 (New entrance enclosure to north elevation, installation of ramp and associates to south elevation, roof terrace and alterations to building facade)	Approval	30 April 2019
67351/APP/2019/1113	Removal of timber refuse screen and installation of a timber refuse area and 4 covered cycle shelters	Approval	01 April 2019
67351/APP/2018/4139	Non-Material Amendment to Planning Permission reference: 67351/APP/2018/610 (New entrance enclosure to north elevation, installation of ramp and associated alterations to south elevation, roof terrace and alterations to building facade) for alterations to roof terrace including removal of switch room, reduction in size of lift enclosure and reduction in setback of the proposed screening	Approval	23 November 2018
67351/APP/2018/2566	Details pursuant to conditions 3 (Materials) and 4 (Landscape Scheme) of planning permission Ref: 67351/APP/2018/610 dated 13/04/2018 (New entrance enclosure to north elevation, installation of ramp and associates to south elevation, roof terrace and alterations to building facade)	Approval	11 July 2018

- 2.11. The established lawful use of the office buildings on-site and the ancillary MSCP is therefore Class E (Commercial, Business and Service).

RELEVANT NEIGHBOURING PLANNING HISTORY

- 2.12. It should be noted that application reference 67351/APP1202412746 permitted the conversion of the upper floors of building HPH1 from office to residential accommodation with a retained office tenant at ground floor level. This change of use has not yet been implemented. As illustrated on the Site Location Plan, building HPH1 is included within the Applicant's ownership, however, it is excluded from the current application site boundary.

2.13. The following planning applications at Buildings HPH3 and HPH4 are also considered to be of relevance:

Building	LPA Ref.	Proposal	Decision / Date
HPH3	67702/APP/2018/920	Prior approval change of use from office (Class B1(A)) to residential (Class C3) to provide 157 units.	Approved 23 May 2018
HPH3	73998/APP/2020/3589	Change of use from office (Use Class B1(a)) to residential (Use Class C3) to provide 114 residential units (Prior Approval).	Approved 01 April 2021
HPH4	76655/APP/2021/3039	Re-development of the vacant Site to provide a residential development comprising 131 (C3) residential units, with associated amenity areas, landscaping, car parking and all ancillary and enabling works.	Approved 19 January 2022

PRE-APPLICATION ENGAGEMENT

London Borough of Hillingdon

- 2.14. An initial pre-application meeting took place with the Council on 30 January 2024 for the construction of a data centre on-site. In the pre-application response (LPA Ref. 67702/PRC/2023/158) dated 20 March 2024, Council officers instead considered the Site to be more appropriate for residential development. Indeed, officers noted the character of Hayes is transforming *“from a declining industrial area into a contemporary residential quarter”*.
- 2.15. Therefore, a second pre-application meeting with the Council took place on 29 August 2024 to discuss the broad principles of redeveloping the Site for residential purposes (LPA Ref. 67702/PRC/2024/123).
- 2.16. A third pre-application meeting took place with the Council on 13 November 2024, whereby more detailed outline parameter / design approaches were discussed.
- 2.17. A further Design / Heritage and Townscape focused meeting then took place on 11 December 2024.
- 2.18. Following this, a fourth pre-application meeting took place with the Council on 11 February 2025, to refine the emerging redevelopment proposals.
- 2.19. A fifth pre-application meeting then took place with the Council on 10 April 2025, where the emerging design code, and other more detailed design matters, were discussed.

- 2.20. A sixth pre-application meeting took place with the Council on 16 May 2025, whereby responses to previous officer comments were presented and discussed.
- 2.21. A seventh pre-application meeting took place with the Council on 9 July 2025. During this meeting, the latest iteration of the scheme (and how this had responded to earlier officer comments) was presented and discussed.
- 2.22. Therefore, overall, the Proposals are the result of extensive and collaborative pre-application engagement undertaken with the Borough's planning, design and technical officers.

Design South-East Design Review Panel

- 2.23. A Design Review Panel ("DRP") meeting took place on 27 February 2025 with 'Design South East', whereby an earlier iteration of the scheme was presented for comment. At this stage, feedback received from the DRP broadly included the following:
- Design and Character - it was suggested that greater height differentials would help to make the development more distinctive. A 'finer grain' of development was also recommended.
 - Public Realm, Landscaping and Play Space – consideration regarding who will use the proposed public spaces was requested, with greater emphasis encouraged on the network of public realm spaces to be proposed.
 - Creating a Sense of Community – greater pedestrian permeability was encouraged through the Site, including recommendations that the north-south route through the Site should be more legible and connected with the existing street pattern to the north.
 - Transport and Parking - the panel were supportive of the reduction in car parking on the Site noting that 0.2 cars per dwelling was commendable and that it was sensible to reuse the existing basement level below Building HPH5.
- 2.24. Further to the above, the scheme was amended in various ways. The design evolution of the proposals is set out in further detail within the submitted Design and Access Statement.

Greater London Authority ("GLA")

- 2.25. A pre-application meeting took place with the GLA on 4 April 2025. The GLA pre-application response broadly supported the principle of residential land use on-site subject to a detailed justification for the loss of office floorspace in this part of the Borough being provided at application stage. Additionally, the broad urban design principles were supported including the approach to height and massing. Furthermore, the approach to strategic transport matters was broadly acceptable, particularly the removal of the majority of the existing parking on site was considered positively.
- 2.26. A separate sustainability focused meeting took place with GLA Officers on 23 April 2025 to discuss circular economy and whole life carbon principles. These approach to assessing these matters at application stage was broadly agreed.

Public Consultation

- 2.27. A public consultation event was held on 21 May 2025, attendees included Ward Councillors, Cabinet Members, members of the public and other local stakeholders. During this event, feedback was received from the public which has informed

elements of the scheme (notably the Design Code and how aspects of the Site's history could be referenced within future Reserved Matters Application proposals in the future).

- 2.28. Further information on public consultation can be found in the Statement of Community Engagement, prepared by Consult Communications.

3.0 PROPOSED DEVELOPMENT

3.1. The Application seeks Outline Planning Permission for the following:

“Outline planning permission (with all matters reserved excluding access) for demolition of existing buildings (above basement level) and phased delivery of residential development (Class C3), flexible residential / commercial floorspace, new public realm, landscaping, play space, car parking, cycle parking and associated works.”

3.2. The Proposed Development comprises the following key elements:

- Demolition of existing buildings (albeit the basement level below Building HPH5 will be retained);
- Delivery of a high quality residential led, mixed-use development comprising significant new dwellings and up to 150m² of flexible ancillary residential / commercial floorspace. At this stage, we propose that up to 673 new dwellings be provided on-site (and envisage that these matters can be secured through planning condition in due course).
- Provision of a mix of housing typologies, including 42% one-bedroom apartments; 42% two-bedroom apartments; 16% three-bedroom apartments (it is envisaged that this proposed mix be secured through planning condition in due course).
- Establishment of a variety of site parameters including:
 - Various maximum building heights throughout the scheme (from 3-11 storeys);
 - Provision of up to 272 no. car parking spaces including 130 residential spaces (equating to 0.2 spaces per residential dwelling) and 142 commercial spaces (for the retained commercial operators on the Site);
 - Creation of a new pedestrian crossing over North Hyde Road; and
 - Provision of high-quality landscaping including public open space and child’s play space.

3.3. This Application seeks Outline planning permission, with all matters reserved aside from access. A series of Parameter Plans and a Design Code are submitted for approval in support of this application. These establish the proposals’ parameters in terms of land use, height, key routes and the broad location / layout of future buildings on-site.

PROPOSED PARAMETERS

3.4. The submitted Parameters Plans which are informed by site constraints proposes the following matters for approval:

- Parameter Plan 1 - Building Zones (drawing ref: A12440 TPB ZZ ZZZ DR A 041001 S2 P04);
- Parameter Plan 2 - Access and Movement (drawing ref: A12440 TPB ZZ ZZZ DR A 041002 S2 P04);
- Parameter Plan 3 - Hard and Soft Landscape (drawing ref: A12440 TPB ZZ ZZZ DR A 041003 S2 P03);
- Parameter Plan 4 - Building Heights (drawing ref: A12440 TPB ZZ ZZZ DR A 041004 S2 P03);

- Parameter Plan 5 - Land Use (drawing ref: A12440 TPB ZZ ZZZ DR A 041005 S2 P03);
- Parameter Plan 6 – Trees (drawing ref: A12440 TPB ZZ ZZZ DR A 041006 S2 P03);
- Parameter Plan 3D – Max Building Heights (drawing ref: A12440 TPB ZZ ZZZ DR A 041007 S2 P01);

3.5. The Demolition Plans accompanying this application confirm all existing buildings to be demolished (with the exception of the basement level within existing Building HPH5 which will be retained).

DESIGN CODE

3.6. The Design Code, prepared by TP Bennett defines key design principles necessary to guide future development and to ensure individual buildings and spaces achieve the overall goals of the masterplan concept. The Design Code covers urban design, architecture, landscape, streets and sustainability, it will be used to inform the detailed designs of the future Reserved Matters Applications.

ILLUSTRATIVE MATERIAL

3.7. As set out previously, the application is supported by submission of an Illustrative Scheme (totalling 652 units). This shows one of the ways that the proposed Parameter Plans and Design Code could be interpreted to deliver a high-quality residential-led scheme on-site (albeit the specific design of any detailed proposals in due course will be subject to Reserved Matters approvals in due course). To confirm, the Illustrative Scheme is not submitted for formal approval and is not intended to comprise an 'approved document'.

3.8. The illustrative scheme comprises delivery of the following key elements:

Residential Accommodation

3.9. The illustrative scheme will deliver a total of up to 652 residential units (Use Class C3) across the Site and will comprise of the following unit mix:

- 42% x 1bed dwellings
- 42% x 2bed dwellings
- 16% x 3bed dwellings

3.10. The above would comprise a mix of duplexes and flatted blocks up to 11 storeys (67.9m AOD maximum).

3.11. Duplex units, at various ground floor locations, will be afforded private external amenity in the form of a front garden. In addition to this, and as set out below, there will be a number of open green spaces including a gateway, social heart and nurture garden within the development to which the residents can use as communal amenity.

3.12. All residential units will be designed to meet Nationally Described Space Standards.

Ancillary Residential / Commercial Floorspace

- 3.13. The proposals also include provision for up to 150sqm (GIA) of flexible 'ancillary residential / commercial' floorspace (Class C3 / Class E) within the scheme, likely located within the northern part of the Site at ground level. It is envisaged that this will take the form of either an ancillary resident' lounge area or small-scale commercial unit, which will provide active frontage and a focal point within the part of the Site. Flexible use is sought at this stage, as it is currently not clear who the operator of this space will be in the future. It is envisaged that this will be confirmed at Reserved Matters Application Stage.

Open Space

- 3.14. As illustrated on the Illustrative Masterplan, the scheme will deliver a number of new open green spaces within the Site which have been purposefully integrated into the design of the scheme. Approx. 5,626m² of publicly accessible open space is proposed.

Play Space

- 3.15. The Illustrative Scheme proposes high-quality play space through provision of 1,752m² child's play space. As set out in the Design and Access Statement, the intended play strategy is developed in a multifaceted way, providing play potential for all different age groups at different times of day. Older and more active play would be positioned in the Social Heart - the more open and active area with greater footfall. Younger play would be focused in the Nurture Garden, the more enclosed square at the base of the site. This positioning of the play space addresses the feedback from the Design Review Panel as discussed at Paragraph 3.15 of this Statement.

Trees

- 3.16. The proposed tree removal strategy has been carefully considered, with every effort made to retain existing trees and limit the number of tree removals. The Proposals include the removal of 12 no. individual trees, 15 no. noted trees and 5 no. small groups of trees. Further detail is provided in the Arboricultural Impact Assessment.

Landscape

- 3.17. The Proposals seek to deliver a high quality landscaping strategy throughout the Site comprising a new Gateway space, Social Heart and Nurture Garden areas from a landscaping perspective.
- 3.18. Together, these varied spaces ensure the public realm caters to a broad spectrum of activities and experiences, from arrival and orientation, to socialising and quiet reflection, supporting a vibrant and inclusive community. High-quality landscape planting is to be incorporated as illustrated in the Design and Access Statement, prepared by TP Bennett.

Car Parking Provision

- 3.19. The total number of parking spaces accommodated by the illustrative proposal is 272.
- 3.20. This provision includes 130 residential spaces (equating to 0.2 spaces per residential dwelling) and 142 commercial spaces (for the retained commercial operators on the Site).

- 3.21. This approach comprises a significant reduction in car parking provision compared to the existing context (i.e. the 696no. car parking spaces on-site including within the MSCP). Further details concerning these matters are included within the submitted Transport Assessment.

Cycle Parking

- 3.22. As illustrated within the Design and Access Statement, prepared by TP Bennett, covered and secure cycle parking has been introduced in a number of locations.
- 3.23. Approx. 1,210 no. cycle parking spaces is proposed including 18 no. short-stay spaces for visitors and 1,192 no. long-stay spaces for proposed residents. This is envisaged to be split across various cycle parking types – including 75% two-tier cycle stands, 20% Sheffield stands and 5% wider Sheffield stands.
- 3.24. Please refer to the Transport Statement, prepared by TTP, for further information on cycle parking.

4.0 PLANNING POLICY CONTEXT

- 4.1. Section 70(2) of the Town and Country Planning Act 1990 and Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications must be determined in accordance with the Development Plan unless material considerations indicate otherwise.

NATIONAL PLANNING POLICIES AND GUIDANCE

- 4.2. The revised National Planning Policy Framework (“the NPPF”) was published on 7 February 2025. The NPPF sets out the Government’s approach to planning matters and, is a material consideration in the determination of planning applications

- 4.3. Paragraph 2 of the NPPF states:

“Planning law requires that applications for planning permission must be determined in accordance with the development plan [including the Local Plan and Neighbourhood Plans], unless material considerations indicate otherwise. The National Planning Policy Framework ... is a material consideration in planning decisions”.

- 4.4. The NPPF explains that the purpose of the planning system is to contribute to the achievement of sustainable development (Paragraph 7). In order to achieve sustainable development, Paragraph 8 identifies three overarching objectives of the planning system; an economic objective, a social objective and an environmental objective.

- 4.5. At the heart of the NPPF is the presumption in favour of sustainable development (paragraph 11). For decision-making this means:

- *“Approving development proposals that accord with an up-to-date development plan without delay”; or*
- *“Where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:*
 - *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”*

- 4.6. The NPPF and the National Planning Practice Guidance (2014), (“the NPPG”), published on 6 March 2014 provide guidance on the implementation of planning policies. The NPPF requires Local Planning Authorities to approach planning decisions in a positive and creative way and to work proactively with applicants, in order to secure developments that will improve the economic, social and environmental conditions of the area (Paragraph 38).

THE DEVELOPMENT PLAN

Adopted Local Plan

- 4.7. The key Statutory Development Plan documents comprise:

- The London Plan (2021);

- Local Plan Part 1: Strategic Policies (2012);
- Local Plan Part 2: Development Management Policies (2020); and
- Local Plan Part 2: Site Allocations and Designations (2020).

Emerging Local Plan

- 4.8. The London Borough of Hillingdon is currently consulting on its new Local Plan, with the Regulation 18 Consultation closing on 24 June 2024.
- 4.9. An updated Regulation 19 Consultation Draft Local Plan is expected to be published later this year, following which submission to the Secretary of State is due in August 2026 (with adoption anticipated in June – July 2027).
- 4.10. Given the early stage of the emerging Local Plan, this document currently carries limited weight and the adopted local plan policies (2020) take precedence alongside the NPPF. To date, the Site is not the subject of a site-specific allocation nor policy within the emerging Local Plan (albeit the Applicant has made previous representations in response to the above Regulation 18 consultation seeking for the Site to be included within the Hayes 'Housing Zone').

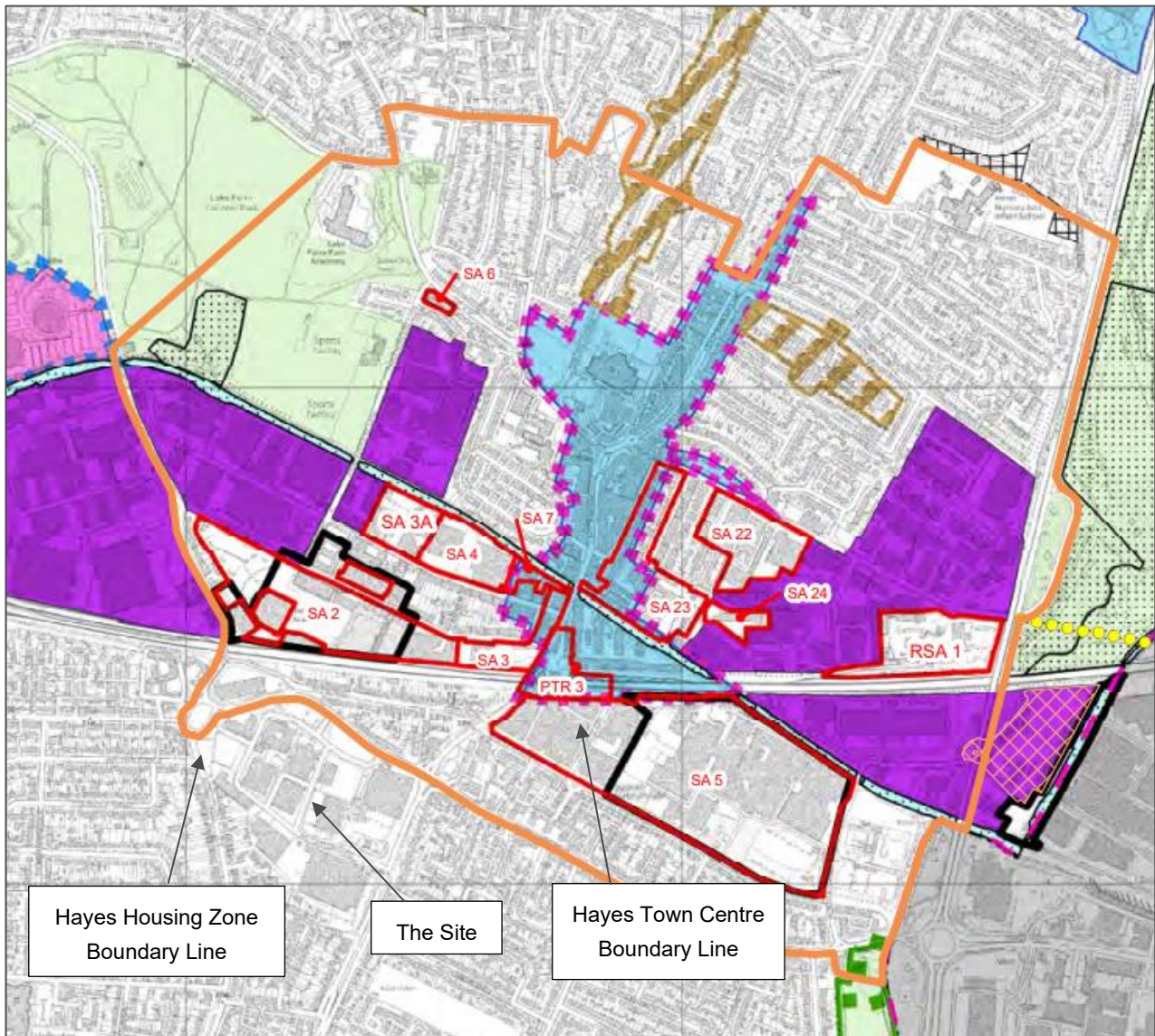
Emerging London Plan

- 4.11. On 9 May 2025, the Mayor of London published a consultation document which looked towards developing the next London Plan. This consultation document focussed on early policy-making principles and holds limited weight in planning decision-making currently.

SITE SPECIFIC DESIGNATIONS

- 4.12. At a Strategic level, the Site sits within the Hayes Opportunity Area as identified in the London Plan (2021). According to the local plan Policies Map (2020), the Site is not allocated/safeguarded for any particular form of development in the adopted Local Plan. The Site is situated within an 'Air Quality Management Zone' and within an aeronautical safeguarding zone for Heathrow Airport.
- 4.13. As set out previously, the Site does not comprise any listed buildings and it is not located in a Conservation Area. The nearest Conservation Area is the Botwell: Thorn EMI, Conservation Area to the North of the Site across from the railway line. The Botwell Nestle Conservation Area is further East along Nestles Avenue. The Site falls within Flood Zone 1 (i.e. lowest probability of flooding). There are no Tree Preservation Orders (TPOs) on the Site.
- 4.14. The Site is located just outside of the Hayes Housing Zone boundary, as illustrated by the Policy Map at Figure 1.

Figure 1 – Policy Map Extract



OTHER MATERIAL CONSIDERATIONS

- 4.15. A number of supplementary planning documents (SPDs) have been adopted by the Council. These are also a material consideration in respect of the Application. Those of relevance are:
- Open Space Strategy (2011);
 - Planning Obligations SPD (2014); and
 - Accessible Hillingdon SPD (2017).
- 4.16. A detailed planning policy assessment considering key site specific designations is at **Section 6.0** of this Statement.

5.0 PLANNING POLICY ASSESSMENT

BROAD PRINCIPLE OF DEVELOPMENT

- 5.1. The NPPF (2025) places considerable focus on the delivery of housing in a sustainable manner in order to meet local needs. Notably:
- Paragraph 124 of the NPPF promotes an effective use of land through making as much use as possible of previously developed or brownfield land.
 - Paragraph 125 of the NPPF states that local authorities should give substantial weight to the value of using suitable brownfield land within settlements for homes.
- 5.2. Policy GG2 'Making the best use of land' of the London Plan (2021) prioritises the development of brownfield land, particularly in Opportunity Areas. Part B of this policy also seeks to prioritise sites which are well-connected by existing or planned public transport. Part C promotes higher density development, particularly in locations that are well-connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 5.3. In general terms, the London Plan (2021) also identifies Hayes as an Opportunity Area with significant capacity for new homes and jobs.
- 5.4. Part 1 of the Local Plan (2012) sets out the Borough will work to ensure development makes the most efficient use of brownfield land.
- 5.5. In our view, the Site presents a highly accessible and sustainable brownfield development opportunity capable of delivering a high-quality residential-led, mixed-use scheme that will be in-keeping with the surrounding existing and emerging local character, thereby aligning with Policy GG2 and other key policies (and subject to other planning policy considerations being robustly addressed).

LOSS OF EXISTING USE

- 5.6. The existing office buildings and MSCP on-site are between 3 to 5 storeys in height and provide circa 31,288 (GIA) of Class E floorspace. The Proposed Development includes the demolition of Buildings HPH2, HPH5 (above basement level) and the MSCP.
- 5.7. Paragraph 128 of the NPPF (2025) states that:

"Local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans, where this would help to meet identified development needs. In particular, they should support proposals to:

- a) use retail and employment land for homes in areas of high housing demand, provided this would not undermine key economic sectors or sites or the vitality and viability of town centres, and would be compatible with other policies in this Framework; and*

- b) *make more effective use of sites that provide community services such as schools and hospitals, provided this maintains or improves the quality of service provision and access to open space”.*

5.8. Policy DME 2 ‘Employment Sites Outside Designated Employment Areas’ of the Local Plan Part 2 (2020) states:

“Proposals which involve the loss of employment floorspace or land outside of designated employment areas will normally be permitted if:

- i. the existing use negatively impacts on local amenity, through disturbance to neighbours, visual intrusion or has an adverse impact on the character of the area; or*
- ii. the site is unsuitable for employment reuse or development because of its size, shape, location, or unsuitability of access; or*
- iii. Sufficient evidence has been provided to demonstrate there is no realistic prospect of land being reused for employment purposes; or*
- iv. The new use will not adversely affect the functioning of any adjoining employment land; or*
- v. The proposed use relates to a specific land use allocation or designation identified elsewhere in the plan”.*

5.9. Part I of Policy E1 ‘Offices’ of the London Plan (2021) supports the redevelopment of surplus office space to other uses including housing.

5.10. The Site is not allocated for employment use in the adopted Local Plan (2020). Furthermore, the vast majority of useable office floorspace on the Site is vacant currently despite investment in renovations and sustained marketing efforts to attempt to attract new tenants. In short, the existing office buildings on-site have little chance of being occupied in their current form in the longer term.

5.11. In addition, whilst the MSCP technically comprises 13,819m² ancillary office floorspace (GIA), this building comprises car parking provision and generates no employment / jobs currently.

5.12. The Site has been subject to an extensive marketing campaign over a significant period of time which demonstrates that there is no occupational demand for the existing offices. As stated in the submitted Marketing Overview letter, prepared by Montagu Evans (at **Appendix 1.0**), given the supply/demand dynamics within the local office submarket, vacancy levels are expected to remain high at the Site and therefore headline rents are expected to fall or stagnate in the short to medium term. Overall, non-core office markets such as Heathrow and Hayes continue to experience the significant impacts of the post-Covid hybrid working model which has seen corporates consolidate their office footprints.

5.13. In summary, both local and regional policy allows for alternative uses to be considered on the Site, so long as it can be demonstrated the existing use of the Site is no longer required to meet the economic development needs of the area. The Applicant has provided evidence to this effect, and the principle of ‘losing the existing office use’ on-site is considered to be acceptable.

5.14. In addition, and as set out below, there is a fundamental need to increase housing delivery throughout the Borough, and London more widely, on highly-accessible, brownfield land – and as such, the nature of the redevelopment proposals (i.e. residential-led) is also considered to justify any perceived loss of office accommodation on-site.

PRINCIPLE OF RESIDENTIAL LAND USE

- 5.15. Housing delivery is a key objective of the NPPF (2025), and it advocates that a sufficient amount and variety of land should come forward to significantly boost the supply of housing (Paragraph 61). The NPPF also requires Authorities to demonstrate a minimum five year housing land supply (HLS).
- 5.16. Part B(1) of Policy H1 'Increasing Housing Supply' of the London Plan (2021) states that Boroughs should encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period and enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA. Part B(2) of this policy states that Boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station or town centre boundary.
- 5.17. Policy COM1 'Housing Provision 2011-2029' of the Local Plan Part 1 (2012) states that:
- "The delivery [of housing] will be met through completions, commitments, unplanned development and the allocation of strategic sites".*
- 5.18. The Council published its latest Housing Land Supply Statement ("HLSS") in March 2023. At this stage, it confirmed that the Borough had a 6.5 years housing land supply against a requirement of 1,123 units. This included an allowance of 295 units (26% of the requirement) is made for windfall sites.
- 5.19. In addition, the latest Housing Delivery Test ("HDT") for 2023 published on 12 December 2024 shows that LBH scored 91% thereby falling below the minimum requirement and consequentially triggering an action plan.
- 5.20. However, since the date of publishing the HLSS and HDT, the Borough's housing need position has shifted, Notably, an updated local housing need requirement based on the Government's revised standard methodology is now applicable, which confirms that 2,292 dwellings per annum will be required within the Borough. The increased annual housing need figures (from 1,123 to 2,292) result in the Council's housing supply arguably falling from 6.5 years to circa 3.2 years. As such, there is now a clear demonstrable need to identify additional land for housing delivery, and to approve housing development through windfall applications on sustainable, highly accessible, and previously developed sites.
- 5.21. As set out previously, the Site is situated adjacent to the identified 'Hayes Housing Zone', and comprises a highly accessible, brownfield location capable of delivering significant new housing within the short-to-medium term. The wider surrounding area is also importantly undergoing a period of transition, with several large-scale redevelopment residential redevelopment projects consented and / or being delivered locally (as described in detail within earlier sections of this Planning Statement).
- 5.22. Given the above circumstances, there is a strong case to redevelop the Site for residential use. In short, relevant planning policies direct housing to sustainable brownfield sites of this nature, and other material considerations (namely the Borough's increased housing need requirements) also support this approach.

HOUSING MIX

- 5.23. Paragraph 61 of the NPPF (2025) sets out the overall aim for delivering a sufficient supply of homes should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community.

- 5.24. Policy DMH 2 'Housing Mix' of the local plan (2020) states "The Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need".
- 5.25. Part C of Policy GG4 'Delivering the homes Londoners need' of the London Plan (2021) highlights the importance of creating mixed and inclusive communities, with good quality homes that meet high standards of design. The above is echoed by Policy SD1 'Opportunity Areas' of the London Plan (2021).
- 5.26. In summary, the proposed parameters allow for flexibility concerning how the proposals can come forward at Reserved Matters Application stage.
- 5.27. In any event, the Illustrative Scheme proposed as part of this application, confirms how a detailed scheme could potentially come forward in the future, underpinned by the proposed parameters and development principles. The Illustrative Scheme indicates that a housing mix including 42% one-bedroom apartments; 42% two-bedroom apartments; and 16% three-bedroom apartments could be appropriate on-site, whilst still allowing for residential housing numbers to be sensitively optimised as much as possible.
- 5.28. Overall, the housing mix included within the illustrative scheme is considered to broadly align with key policy aspirations and reflects the housing mixes of other nearby schemes. The Applicant would like to agree how this mix (or a mix resembling this) could potentially be secured via planning condition in due course.
- 5.29. We consider that the above-mentioned proposed housing mix percentages could be referenced indicatively within a planning condition attached to the outline permission (albeit with details of a final proposed mix to be confirmed either via an approval of details application within a RMA in the future).

AFFORDABLE HOUSING

- 5.30. Policy H2 'Affordable Housing' of the Local Plan Part 1 (2012) states that for sites with a capacity of 10 or more units the Council will seek to ensure that the affordable housing mix reflects housing needs in the Borough, particularly the need for larger family units.
- 5.31. The development proposes up to 673 residential dwellings. As set out in the submitted Financial Viability Assessment, prepared by Montagu Evans, the viability of the Proposed Development is very compromised, and currently the delivery of any affordable housing on-site would be significantly challenging (and considered to be unviable).
- 5.32. The Applicant is in the process of discussing the viability position with Borough officers, and the Council's independent third-party viability reviewer and the GLA and looks forward to discussing / reviewing next steps concerning these matters prior to determination of this application.

DESIGN AND BUILT FORM

- 5.33. High quality and inclusive design within new development is encouraged at all policy levels. The NPPF (2025) notes that good design is a key aspect of sustainable development and plays a crucial role in promoting better places for people. Paragraph 135 of the NPPF (2025) states that planning policies and decision makers should ensure that developments:

- a) *will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;*

- b) *are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;*
- c) *are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);*
- d) *establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;*
- e) *optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and*
- f) *create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.*

5.34. Policy BE1 'Built Environment' of the Local Plan Part 1 (2012) requires new development to *"improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods"*.

5.35. Policy DMHB 11 'Design of New Development' of the Local Plan Part 2 (2020) states:

A) All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:

i. harmonising with the local context by taking into account the surrounding:

- *scale of development, considering the height, mass and bulk of adjacent structures;*
- *building plot sizes and widths, plot coverage and established street patterns;*
- *building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;*
- *architectural composition and quality of detailing;*
- *local topography, views both from and to the site; and*
- *impact on neighbouring open spaces and their environment;*

ii. ensuring the use of high quality building materials and finishes;

iii. ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;

iv. protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and un-designated, and their settings;

v. landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

B) Development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

C) Development will be required to ensure that the design safeguards the satisfactory re-development of any adjoining sites which have development potential. In the case of proposals for major development sites, the Council will expect developers to prepare master plans and design codes and to agree these with the Council before developing detailed designs.

D) Development proposals should make sufficient provision for well-designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours”.

5.36. Policy D3 ‘Optimising site capacity through the design-led approach’ of the London Plan (2021) states “all development must make the best use of land by following a design-led approach that optimises the capacity of sites”.

5.37. As stated in the Design and Access Statement, prepared by TP Bennett, the illustrative proposals seek to deliver 652 dwellings with building heights varying from 3-11 storeys. The maximum height of 67.9m AOD proposed via the submitted Parameter Plans would enable up to 11 storey residential elements to be delivered on part of the Site.

5.38. A Design Code has been submitted alongside this application to allow flexibility for the future prospective purchaser whilst also ensuring good quality design. The Design Code sets out a variety of principles and design requirements which either ‘should’ or ‘must’ be considered within any detailed Reserved Matters proposals in due course. This document is the result of extensive discussion and testing with the Borough and DRP at pre-application stage and provides a robust framework which will ensure high-quality design principles are considered comprehensively at detailed design stage.

TALL BUILDING ASSESSMENT

5.39. Part A of Policy D9 ‘Tall Buildings’ of the London Plan (2021) states Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.

5.40. Part B sets out the following:

1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.

2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.

3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.

5.41. Part C identifies a series of impacts that need to be considered including visual impacts, functional impacts, environmental impacts and cumulative impacts.

5.42. Part D states that free to enter publicly accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.

- 5.43. Policy BE1 'Built Environment' of Part 1 of the Local Plan (2012) states tall buildings not adversely affect their surroundings including the local character, cause harm to the significance of heritage assets or impact on important views. Appropriate locations for tall buildings will be defined on a Character Study and may include parts of Uxbridge and Hayes subject to considering the Obstacle Limitation Surfaces for Heathrow Airport. Outside of Uxbridge and Hayes town centres, tall buildings will not be supported. The height of all buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape.
- 5.44. Given the detailed criteria set out in London Plan Policy D9, we have provided an assessment of the Proposals in relation to these matters below:

Policy D9 Criteria	Assessment
Visual Impacts (in accordance with Policy D9 Part 1)	<p>As set out within the submitted Heritage, Townscape and Visual Impact Assessment ("HTVIA"), a townscape and visual impact assessment of the proposed maximum outline parameter modelling (and for indicative purposes, the Illustrative Scheme) has been undertaken – essentially assessing the visual impacts of the proposals within 23 key views / viewpoints (a mixture of long-range, mid-range and immediate views, the scope and location of which was agreed with Council officers at pre-submission stage).</p> <p>The HTVIA concludes that:</p> <ul style="list-style-type: none"> - It is not considered that the Proposed Development represents a material change alter or impacts the existing viewing experience. - The introduction of a more varied skyline (through the proposals) with buildings of higher architectural quality (to be secured through the Design Code) and proportions which harmonious, coupled with a contextual material palette of brick and masonry (again to be secured through the Design Code) will represent an improvement to the appearance of the Site in the context of regenerative change across the wider local area. - The proposed development would form a positive element of townscape that would contribute to the overall character and enjoyment of the area. <p>The proposals will not result in any harm to the setting nor character of nearby heritage assets.</p>

	Full details of the visual impacts of the Proposals are set out in detail within the HTVIA.
Functional Impacts (in relation to Policy D9 Part 2)	<p>As set out in the Fire Statement, the proposed internal and external design and emergency exit routes have been designed to ensure the safety of all occupants. Thus, the proposal complies with part a.</p> <p>As set out in the Delivery and Servicing Plan, the proposal will be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Thus, the proposal complies with part b.</p> <p>As set out in the Transport Assessment, the proposal is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building. Indeed, the development proposes a reduction in car parking reflecting a projected decrease in vehicular movements to and from the Site. Thus, the proposal complies with parts c and d.</p> <p>As set out in the Economic Assessment, once complete and operational, the Proposed Development is also expected to generate approximately £15.1 million in annual residential expenditure. Thus, the proposal complies with part e.</p> <p>As set out in the Aviation Report, the proposal will not interfere with aviation, navigation or telecommunication, considering the Aeronautical Safeguarding Zone. Thus, the proposal complies with part f.</p>
Environmental Impacts (in relation to Policy D9 Part 3)	<p>As set out in the Wind and Microclimate Assessment, the proposal will not result in any adverse wind impacts and will not compromise comfort and the enjoyment of open spaces, including water spaces, around the building. Thus, the proposal complies with part a.</p> <p>As set out in the Air Quality Assessment, the proposal will not result in any adverse air quality impacts. Thus, the proposal complies with part b.</p> <p>As set out in the Noise Assessment, the proposal will not result in any adverse impacts from a noise perspective and will not detract from the comfort and enjoyment of open</p>

	spaces around the building. Thus, the proposal complies with part c.
Cumulative Impacts	<p>As set out in the Design and Access Statement, the proposed development has been purposefully designed to consider the cumulative visual, functional and environmental impacts of proposed tall buildings. Thus, the proposal complies with part a.</p> <p>A cumulative assessment has been undertaken as part of the HTVIA, setting out how any impacts of the proposals would be perceived when combined with those associated with other committed / emerging schemes (the list of which was agreed with the LPA at pre-submission stage). Overall, the cumulative scenario includes an intensification of residential development, associated with a change of character seen across the area.</p> <p>The Proposed Development broadly accords with the direction of travel of the townscape character area and introduced commensurate uses new public open space and a variety of uses which will contribute to a diverse and vibrant built environment</p>

- 5.45. As set out above, the Proposals are considered to respond robustly to the criteria set out in London Plan Policy D9, and as such, the proposed building heights and massing (as set out via the parameter plans) are considered to be appropriate and justified within their context. The proposed Parameter Plans seek to ensure that a range and variation of building heights will come forward on-site, which will result in visual interest and positive impact to the local skyline, whilst the submitted Design Code seeks to ensure that a high standard of architectural quality is delivered at Reserved Matters Stage (further cementing the appropriateness for ‘tall buildings’ in this instance.

DAYLIGHT, SUNLIGHT AND OVERSHADOWING

Impacts of Neighbouring Receptors

- 5.46. Policy ‘DMHB 11: Design of New Development’ of the Local Plan Part 2 (2020) states *“development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space”*.
- 5.47. Part C of Policy D6 ‘Housing Quality and Standards’ of the London Plan (2021) states *“Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating”*.

- 5.48. Part D notes that *“The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space”*.
- 5.49. As stated in the Daylight, Sunlight and Overshadowing Report, prepared by Anstey Horne, the majority of the windows (71% for vertical sky line) and rooms (76% for daylight distribution) tested within the neighbouring buildings will satisfy the BRE criteria for daylight (i.e. when tested using the maximum proposed parameters model, based on the submitted Parameter Plans).
- 5.50. Regarding sunlight levels within existing neighbouring / nearby residential properties, the vast majority of the rooms (93% for annual probable sunlight hours and 95% for winter probable sunlight hours) will achieve the BRE target for sunlight.
- 5.51. Therefore, the Proposed Development is considered to perform well overall against the BRE Guidelines in terms of its daylight and sunlight impacts on neighbouring receptors.

Internal Daylight and Sunlight Impacts and Overshadowing

- 5.52. An internal daylight and sunlight assessment of the maximum parameters model has been undertaken. This confirms that the proposed living spaces—especially those on outward-facing facades—benefit from excellent daylight penetration, while the communal amenity areas receive good levels of sunlight. Overall, the scheme optimises both daylight and sunlight access to create bright, healthy interiors for future occupants.
- 5.53. In conclusion, the layout of the proposed development aligns with the principles in the BRE Guidelines and its practical application to make efficient use of development sites. Furthermore, the facade mapping exercises within the proposed development demonstrate good levels of daylight and sunlight for the purpose of an Outline planning application. Overall, the development should therefore be considered acceptable in daylight, sunlight and overshadowing terms.

PUBLIC REALM AND LANDSCAPE

- 5.54. Paragraph 187 of the NPPF (2025) states that planning decisions should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, sites of biodiversity or geological value.
- 5.55. Part A of Policy D8 ‘Public Realm’ of the London Plan (2021) states development Plans and development proposals should encourage and explore opportunities to create new public realm where appropriate. Part B places emphasis on ensuring the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain.
- 5.56. Policy DMHB 14 ‘Trees and Landscaping’ of the Local Plan Part 2 states:
- A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.*
- B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.*

C) Where space for ground level planting is limited, such as high rise buildings, the inclusion of living walls and roofs will be expected where feasible.

D) Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an Arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision.

- 5.57. As stated in the Design and Access Statement, prepared by TP Bennett, the public realm strategy set out in the Illustrative Scheme has been purposefully designed to create a connected, welcoming and characterful environment that supports both social interaction and quiet retreat.
- 5.58. The proposed vision is to deliver a rich sequence of well-considered spaces that are pedestrian-friendly, intuitively navigable, and framed by generous greenery, encouraging walking, play and neighbourly exchange throughout the Site. Connected spaces are prioritised to knit the neighbourhood together, ensuring clear and attractive walking routes between homes, communal areas and wider surroundings. Streets and shared surfaces are designed to slow movement and prioritise pedestrians and cyclists, reinforcing a safe and inclusive environment for all. Generous front gardens and thoughtfully landscaped verges soften the interface between private dwellings and the public realm. These planted frontages enhance visual amenity and biodiversity, contributing to a greener streetscape that encourages social interaction while subtly delineating private space. This greening of the public realm establishes a pleasant, verdant character throughout the site.
- 5.59. Three distinct character spaces anchor the landscape framework and enrich the experience of moving through the Site:
- **The Gateway** - marking the entrance to the neighbourhood, this space provides an attractive, welcoming threshold defined by high-quality hard and soft landscaping. Carefully framed views, distinctive tree planting and clear sightlines set a positive first impression, signalling arrival and establishing a coherent identity.
 - **The Social Heart** - centrally positioned and easily accessible, this vibrant green space forms the social hub of the community. Designed with flexible species rich lawns, play features and seating areas, it invites informal gathering, outdoor play and community events. A richer palette of planting, including ornamental trees and colourful shrubs, adds seasonal interest and visual delight.
 - **The Nurture Garden** - located at the centre of the site, this more intimate and ecologically rich space offers a wilder character, with mature tree species, naturalistic planting and opportunities for nature-based play. Meandering paths, secluded seating and habitat-friendly features create a peaceful retreat for residents, promoting wellbeing and fostering biodiversity.
- 5.60. Together, these varied spaces ensure the public realm caters to a broad spectrum of activities and experiences, from arrival and orientation, to socialising and quiet reflection, supporting a vibrant and inclusive community.
- 5.61. Overall, the landscaping strategy aligns with local and regional planning policy and the development should therefore be considered acceptable in landscaping terms.

OPEN SPACE

- 5.62. Part 4 of Policy G4 'Open Space' of the London Plan (2021) highlights that open space, particularly green space, included as part of development should remain publicly accessible.
- 5.63. Hillingdon's Open Space Strategy (2011) sets out the Borough's overarching strategy for open space.
- 5.64. Policy EM4 'Open Space and Informal Recreation' of the Local Plan Part 1 (2012) states that *"Major developments will be expected to make appropriate contributions to the delivery of new opportunities, or to the improvement and enhancements of existing facilities"*.
- 5.65. Part A of Policy DMCI 4 'Open Spaces in New Development' of the Local Plan Part 2 (2020) states:

"Proposals for major new residential development will be supported where they make provision for new open space, or enhancements to existing open space, which meets the needs of the occupiers of the development and contributes to the mitigation of identified deficiencies in the quantity, quality and accessibility of open space. Regard will be had to Hillingdon's local recommended standards of provision for all relevant typologies of open space".
- 5.66. As illustrated in the Design and Access Statement, prepared by TP Bennett, the development proposes a high-quality open space that will be publicly accessible. Overall, this approach will deliver a combined total of 5,626m² of open space.
- 5.67. The proposed open space has been purposefully designed to enhance the visual aesthetic of the Site as well as residents' wellbeing. Overall, the open space strategy has been fully integrated into the design of the scheme and fully complies with planning policy and guidance.

PLAY SPACE

- 5.68. Policy EM5 'Sport and Leisure' of the Local Plan Part 1 (2012) outlines the Council's commitment to ensure that sufficient children's play space is provided to support proposals for new residential development, in accordance with national and local guidance.
- 5.69. Policy DMCI 5 'Children's Play Areas' of the Local Plan Part 2 (2020) states:

A) *"For all major development⁹ proposals, the Council will apply Hillingdon's child yields and the London Plan SPG; 'Providing for Children and Young Peoples Play and Informal Recreation', which specifies that 10sqm of play space should be provided for each child and an accessibility standard of 400 metres to equipped playgrounds;*

B) *In areas of deficiency, there will be a requirement for new provision to be made to meet the benchmark standards for accessibility to play provision"*.
- 5.70. Part A of Policy DMHB 19 'Play Space' of the Local Plan Part 2 (2020) states:

"New major residential developments which result in an occupancy of ten or more children will be required to provide children and young people's play facilities on-site. Where a satisfactory level of provision for children and young people's play facilities cannot be achieved onsite, the Council will seek a financial contribution towards the improvement of existing children and young people's play facilities within the local area".

- 5.71. As illustrated in the Design and Access Statement, prepared by TP Bennett, the Proposals include up to 1,752m² of high-quality play space. Play spaces are integrated throughout the masterplan, from informal natural play routes to dedicated play areas within courtyards and open spaces, ensuring accessible and engaging environments for all ages.

ENERGY AND SUSTAINABILITY

- 5.72. Paragraph 7 of the NPPF (2025) states:

“the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development and supporting infrastructure in a sustainable manner”.

- 5.73. Policy EM1 ‘Climate Change Adaptation and Mitigation’ of the Local Plan Part 1 (2012) promotes the use of decentralised energy within large scale development whilst improving local air quality levels. It also seeks to target areas with high carbon emissions for additional reductions through low carbon strategies. Furthermore, the policy encourages the installation of renewable energy for all new development in meeting the carbon reduction targets savings set out in the London Plan.
- 5.74. Policy DMEI 2 ‘Reducing Carbon Emissions’ of the Local Plan Part 2 (2020) requires all developments to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets. All major development proposals must be accompanied by an energy assessment showing how these reductions will be achieved.
- 5.75. Policy DMEI 3 ‘Decentralised Energy’ of the Local Plan Part 2 (2020) requires all major developments to be designed to be able to connect to a Decentralised Energy Network (DEN).
- 5.76. Part A of Policy SI 2 ‘Minimising greenhouse gas emissions’ of the London Plan (2021) states that major development should be net zero-carbon. This means reducing greenhouse gas emissions in operation and minimising both annual and peak energy demand in accordance with the following energy hierarchy:
- 1) be lean: use less energy and manage demand during operation
 - 2) be clean: exploit local energy resources (such as secondary heat) and supply energy efficiently and cleanly
 - 3) be green: maximise opportunities for renewable energy by producing, storing and using renewable energy on-site
 - 4) be seen: monitor, verify and report on energy performance.
- 5.77. As stated in the Energy Assessment, prepared by Whitecode, the illustrative development will achieve a 79% improvement over Part L 2021 of the Building Regulations. Further testing will be undertaken at the Reserved Matters Application stage to ensure these assumptions are accurate and updated as required.
- 5.78. Overall, therefore, the Proposed Development is considered to be acceptable from an energy and sustainability perspective.

CIRCULAR ECONOMY

- 5.79. Policy GG6 of the London Plan (2021) states that to help London become a more efficient and resilient city, those involved in planning and development must development to seek to improve energy efficiency and support the move towards a low carbon circular economy, contributing towards London becoming a zero carbon city by 2050.

- 5.80. Part B of Policy SI 7 'Reducing waste and supporting the circular economy' of the London Plan (2021) states that referable applications should promote circular economy outcomes and aim to be net zero-waste. A Circular Economy Statement should be submitted, to demonstrate:
- 1) how all materials arising from demolition and remediation works will be re-used and/or recycled
 - 2) how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life
 - 3) opportunities for managing as much waste as possible on site
 - 4) adequate and easily accessible storage space and collection systems to support recycling and re-use
 - 5) how much waste the proposal is expected to generate, and how and where the waste will be managed in accordance with the waste hierarchy
 - 6) how performance will be monitored and reported.
- 5.81. A meeting took place with GLA Officers on 23 April 2025 to discuss circular economy and whole life carbon principles. At this stage, the approach to assessing these matters was broadly agreed.
- 5.82. The submitted Circular Economy Statement, prepared by Whitecode, promotes circular economy outcomes and aims to be net-zero waste by demonstrating how all materials arising from demolition and remediation works will be re-used and /or recycled; how the proposal's design and construction will reduce material demands and enable building materials, components and products to be disassembled and re-used at the end of their useful life opportunities for managing as much waste as possible on site; adequate and easily accessible storage space to support recycling and re-use; how much waste the proposal is expected to generate, and how and where the waste will be handled; and how performance will be monitored and reported. Overall, the Proposed Development aligns with London Plan policy and should thus be considered acceptable from a circular economy perspective.

BIODIVERSITY AND ECOLOGY

- 5.83. Section 15 'Conserving and Enhancing the Natural Environment' of the NPFF (2025) highlights the importance of protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils and pursuing opportunities for securing measurable net gains for biodiversity.
- 5.84. Under the statutory framework for biodiversity net gain, new development is required to deliver at least a 10% increase in biodiversity value relative to the pre-development biodiversity value of the onsite habitat. This increase can be achieved through onsite biodiversity gains, registered offsite biodiversity gains or statutory biodiversity credits.
- 5.85. Policy EM7 'Biodiversity and Geological Conservation' of the Local Plan Part 1 (2012) states that Hillingdon's biodiversity and geological conservation will be preserved and enhanced with particular attention given to the provision of biodiversity improvements from all development, where feasible and the provision of green roofs and living walls which contribute to biodiversity and help tackle climate change.
- 5.86. Policy DMEI 7 'Biodiversity Protection and Enhancement' of the Local Plan Part 2 (2020) states that:

“The design and layout of new development should retain and enhance any existing features of biodiversity or geological value within the site”.

- 5.87. Policy G6 ‘Biodiversity and access to nature’ of the London Plan (2021) states that *“development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain”.*
- 5.88. A Preliminary Ecology Appraisal (PEA) has been prepared by Trium, which confirms the Site is located in an area of low ecological potential. Furthermore, the site does not support any notable habitats, comprising Priority Habitats under the UK Biodiversity Action Plan or ancient woodland.
- 5.89. The Proposed Development comprises soft landscaping and includes the provision of areas of biodiverse green roof within inaccessible areas of the roof of buildings, other green roof habitat across accessible areas of roof and a variety of habitats across the public realm and ground floor including private vegetated gardens, other neutral grassland, modified grassland, native hedgerow and trees.
- 5.90. As stated in the PEA, the Proposed Development can deliver a net gain for biodiversity, with indicative proposals delivering a 56% net gain in habitat units and 40% in hedgerow units. This significantly exceeds the minimum 10% statutory requirement.
- 5.91. Overall, the Proposed Development fully complies with planning policy requirements and should therefore be granted Outline planning permission.

TRANSPORT

Traffic & Highways

- 5.92. Policy T1 ‘Accessible Local Destinations’ of the Local Plan Part 1 (2012) states the Council will steer development to the most appropriate locations in order to reduce their impact on the transport network. All development should encourage access by sustainable modes and include good cycling and walking provision. Furthermore, the policy notes the Council will promote active travel through improvements to Hillingdon’s public rights of way.
- 5.93. Policy DMT 1 ‘Managing Transport Impacts’ of the Local Plan Part 2 (2020) states that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.
- 5.94. Policy DMT 2 ‘Highways Impacts Development’ of the Local Plan Part 2 (2020) states:

“Proposals must ensure that:

- i. safe and efficient vehicular access to the highway network is provided to the Council’s standards;*
- ii. they do not contribute to the deterioration of air quality, noise or local amenity or safety of all road users and residents;*
- iii. safe, secure and convenient access and facilities for cyclists and pedestrian are satisfactorily accommodated in the design of highway and traffic management schemes;*
- iv. impacts on local amenity and congestion are minimised by routing through traffic by the most direct means to the strategic road network, avoiding local distributor and access roads; and*

- v. *there are suitable mitigation measures to address any traffic impacts in terms of capacity and functions of existing and committed roads, including along roads or through junctions which are at capacity”.*

5.95. As set out in the Transport Assessment, prepared by TTP, the proposed new connection/route towards North Hyde Road will reduce car trips by enhancing connectivity to Hayes town centre and Hayes and Harlington Station. The trip generation results show the proposed new homes expected to generate 277 people leaving the Site by all modes in the morning peak hour and 191 persons arriving in the evening peak hour. The proposed new retail unit (150m² of flexible commercial space) will not have any allocated parking and expected to serve the local community with the vast majority if not all trips being secondary, i.e. linked or pass-by. Overall, the proposed development would generate fewer vehicular trips during the peak hours and across the day; as such, capacity enhancements and mitigation measures are not required. Furthermore, the assessment suggests that the proposed development will not lead to a detrimental impact on public transport. Moreover, it is considered, that travel behaviour is changing with more people potentially working from home and travelling via active modes which in turn is expected to potentially relieve pressure on public transport, and, as such the assessment provided is considered to be robust. The development is also considered to facilitate this change in travel trend through providing high-quality homes and bicycle parking in accordance with the London Plan standards which will contribute towards objectives for a sustainable London.

Car Parking

- 5.96. Policy DMT 6 ‘Vehicle Parking’ of the Local Plan Part 2 (2020) requires development proposals to comply with the standards outlined in Appendix C Table 1 of the Plan Part 2. For residential flatted development, the following is required:
- 3 - 4 or more bedrooms - 2 spaces per unit
 - 1 – 2 bedrooms - 1.5 - 1 spaces per unit
 - Studio - 1 space per 2 units
- 5.97. Policy T6 ‘Car Parking’ of the London Plan (2021) states that car parking should be restricted in line with levels of existing and future public transport accessibility and connectivity. Car-free development should be the starting point for all development proposals in well-connected places, with developments elsewhere designed to provide the minimum necessary parking. Where car parking is provided, provision should be made for electric vehicles.
- 5.98. Policy T6. 1 ‘Residential Parking’ of the London Plan (2021) states that new residential development should not exceed the maximum parking standards set out in Table 10.3. Part C requires all residential car parking spaces to provide infrastructure for electric or Ultra-Low Emission vehicles. At least 20% of spaces should have active charging facilities, with passive provision for all remaining spaces.
- 5.99. There are 8 bus services which can be accessed within close proximity of the Site. The nearest bus stop is located within circa 200m from the centre of the Site. Hayes and Harlington Station, which provides access to Elizabeth Line services, is located circa 700m to the west of the Site. The Site has a PTAL level of 4 on a scale of 0 to 6b where 6b is highest.
- 5.100. A total of 272 no. car parking spaces is proposed including 130 residential spaces (equating to 0.2 spaces per residential dwelling) and 142 commercial spaces (for the retained commercial operators on the Site). This reduction in car parking spaces was welcomed by the GLA at pre-application stage (GLA Ref. GLA/2024/0789/P2I).

- 5.101. The reduction in car parking provision from 696 (the office development) to 272 (the proposed development) reflects the Site's sustainable location.
- 5.102. Notably, the impact of the proposals on the existing operation of the local highway network is expected to be beneficial, likely resulting in a significant reduction in peak hour and daily traffic movements at the Site compared to its extant office use. Overall, the reduction in car parking is consistent with London Plan principles and should thus be considered acceptable by the Council.

Cycle Parking

- 5.103. Policy DMT 'Pedestrians and Cyclists' of the Local Plan Part 2 (2020) states that development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network. Appendix C sets out the following requirement for cycle parking for new residential developments:
- 1 per studio, 1 or 2 bed unit
 - 2 per 3 or more bed unit
- 5.104. Policy D5 'Cycle Parking' of the London Plan (2021) states that Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles for disabled people.
- 5.105. High quality cycle parking facilities will also be provided in accordance with the London Plan which will encourage cycling. The illustrative scheme proposes 1,210 spaces including 18 short-stay spaces for visitors and 1,192 long-stay spaces for residents. This is envisaged to be split across various cycle parking types – including potential for 75% two-tier, 20% Sheffield and 5% wider Sheffield stands. We envisage that specific cycle parking requirements will be submitted as part of any subsequent Reserved Matters application for the Site in due course. Overall, the proposed cycle parking is consistent with London Plan principles and should thus be considered acceptable by the Council.

Delivery & Servicing

- 5.106. Delivery and servicing activity will take place from Millington Road and within the new roads within the site, all of which are private. The Proposed Development is expected to receive approximately 100 deliveries per day, with the majority of deliveries undertaken by motorcycle, car and LGV, with a small proportion of deliveries undertaken by HGV (3.5t vehicles or larger).
- 5.107. The illustrative scheme therefore fully complies with the above policies and as concluded in the Transport Assessment, there are no reasons why the Proposed Development, at Outline planning application stage, should not be approved on highways, traffic and transport grounds. A Residential Travel Plan, a Delivery and Servicing Plan, and Refuse Management Plan and an outline Construction Logistics Plan has also been included as a part of this planning application.

ARBORICULTURE

- 5.108. Paragraph 186 of the NPPF (2025) requires developments which results in the loss or detrition of irreplaceable habitats to be refused, unless there are wholly exceptional reasons, and a suitable compensation strategy exists.
- 5.109. Policy DMHB 14 'Trees and Landscaping' of the Local Plan Part 2 (2020) states that:

- A) *“All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.*
- B) *Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.*
- C) *Where space for ground level planting is limited, such as high rise buildings, the inclusion of living walls and roofs will be expected where feasible.*
- D) *Planning applications for proposals that would affect existing trees will be required to provide an accurate tree survey showing the location, height, spread and species of trees. Where the tree survey identifies trees of merit, tree root protection areas and an Arboricultural method statement will be required to show how the trees will be protected. Where trees are to be removed, proposals for replanting of new trees on-site must be provided or include contributions to offsite provision”.*

- 5.110. This position is echoed by the London Plan (2021) which states that “development proposals should ensure that, wherever possible, existing trees of value are retained. If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy”.
- 5.111. As stated in the Arboricultural Impact Assessment, prepared by CBA Trees, the Proposed Development comprises the removal of 12 no. individual trees, 15 no. noted trees and 5 no. small groups of trees. To avoid damage to trees during the development of the Site, tree protection measures are advised which can be imposed via appropriate planning conditions.
- 5.112. Overall, the proposed tree strategy aligns with local and regional planning policy and the development should thus be considered acceptable from an Arboricultural perspective.

FLOOD RISK AND DRAINAGE

- 5.113. The Site is located within Flood Zone 1 (low flood risk zone) and hence is suitable in principle of residential development.
- 5.114. The Flood Risk and Drainage Assessment carried out by Mayer Brown provides a full assessment of the Site and illustrative proposals in relation to relevant national and development policies below.
- 5.115. Paragraph 174 The NPPF (2025) further requires a site specific Flood Risk Assessment be submitted with planning applications for all sites greater than 1 ha in Flood Zone 1, for sites of any size within Flood Zone 2 and 3.
- 5.116. Policy EM6 ‘Flood Risk Management’ of the Local Plan Part 1 (2012) states that the Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable. This is echoed by Policy DMEI 9 ‘Management of Flood Risk’ and Policy DMEI 10 ‘Water Management, Efficiency, and Quality’ of the Local Plan Part 2 (2020).
- 5.117. Policy SI 12 ‘Flood Risk Management’ of the London Plan (2021) states that “Development proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed”. Policy SI 13 ‘Sustainable Drainage’ states that

“Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality, and enhanced biodiversity, urban greening, amenity and recreation”.

- 5.118. The Flood Risk and Drainage Assessment confirms that the indicative proposals are at low risk of flooding and capable of incorporating sustainable drainage requirements. Overall, the development proposal accords with national and local policy guidance in regard to flooding.

ARCHAEOLOGY

- 5.119. Chapter 16 of the NPPF (2025) relates to the conserving and enhancing the historic environment and identifies heritage assets as an irreplaceable resource and that they should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.
- 5.120. Policy DMHB 7 ‘Archaeological Priority Areas and Archaeological Priority Zones’ of Part 2 of the Local Plan (2020) states that the Council “*will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed*”. This is echoed by Part D of Policy HC1 ‘Heritage conservation and growth’ of the London Plan (2021).
- 5.121. An Archaeological Desk Based Assessment has been prepared by RPS. This assessment confirms the Site is not located within an Archaeological Priority Area. Thus, it is considered to have a low potential to contain archaeological evidence relating to any past period of human activity. Any archaeological evidence present within the Site is most likely to be of low (local) significance only. Overall, the proposed development will not impact on any designated archaeological assets.

FIRE SAFETY

- 5.122. Part A of Policy D12 ‘Fire Safety’ of the London Plan (2021) sets out the highest standards of fire safety for development proposals. Part B states that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.
- 5.123. The Fire Statement, prepared by Orion address the requirements outlined in Policy D12 including details of the building’s construction, the means of escape for all building users, features which reduce the risk to life, access for fire service personnel and equipment, how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building and ensures that any potential future modifications to the building will take into account and not compromise the base build fire safety and protection measures.
- 5.124. Overall, the Proposed Development is considered acceptable in fire safety terms. A detailed Fire Statement is proposed to be submitted at Reserved Matters stage.

LAND CONTAMINATION

- 5.125. Paragraph 196 of the NPPF (2025) states that planning policies and decisions should ensure a site is suitable for its proposed use taking account of ground conditions and any risks arising from land instability and contamination.
- 5.126. Policy EM8 ‘Land, Water, Air, Noise’ of the Local Plan Part 1 (2012) states “the Council will expect proposals for development on contaminated land to provide mitigation strategies that reduce the impacts on surrounding land uses.
- 5.127. Policy DME1 12 ‘Development of Land Affected by Contamination’ of the Local Plan Part 2 (2020) states “The Council will support planning permission for any development of land which is affected by contamination where it can be demonstrated

that contamination issues have been adequately assessed and the site can be safely remediated so that the development can be made suitable for the proposed use”.

- 5.128. As set out in the Geo-Environmental Report, prepared by Ramboll, the former uses of the site indicate a moderate potential for the current ground conditions to present a significant risk to the future residential land use.
- 5.129. As such, a Piling Risk Assessment will be required to assess the potential risks to controlled waters in relation to the installation of piled foundations which will be submitted at Reserved Matters stage. It is proposed that these matters be secured through an appropriately worded planning condition in due course.
- 5.130. Overall, and subject to relevant planning conditions / Reserved Matters requirements being secured in due course, the proposals comply with relevant planning policies from a contamination perspective. Further mitigation measures will be assessed in detail at Reserved Matters stage.

WIND AND MICROCLIMATE

- 5.131. Policy DMHB 10 ‘High Buildings and Structures’ of the Local Plan Part 2 (2020) states that any proposal for a high building or structure should not adversely impact on the microclimate (i.e. wind conditions and natural light) of the site and that of the surrounding areas, with particular focus on maintaining useable and suitable comfort levels in public spaces.
- 5.132. Part J of Policy D8 ‘Public Realm’ of the London Plan (2021) states that development proposals should ensure that appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place.
- 5.133. Policy D9 ‘Tall Buildings’ of the London Plan (2021) states that wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building.
- 5.134. A Wind Microclimate Assessment has been prepared by GIA. The assessment confirms the Proposed Development has a significant beneficial impact on the level of wind safety risk to the north west of the site and will eradicate two pre-existing wind safety risks.
- 5.135. Furthermore, the Proposed Development will also have a beneficial impact on conditions around two entrance points on the south-east corner at Millington Road. Wind comfort conditions would be suitable for all intended uses (or no worse than the baseline conditions) for all thoroughfares, roadways, proposed or existing building entrances, bus stops and proposed mixed amenity spaces.
- 5.136. For proposed seating at ground level, terraces and balconies, there would be some regions which are up to one category windier than the target condition based on the illustrative masterplan, however, mitigation methods (such as raised planters, screening of baffles) would be expected to resolve these issues. Further testing will be conducted at Reserved Matters stage.
- 5.137. Overall, the assessment confirms that the Proposed Development will not have any adverse impacts on long term wind microclimate and should thus be considered acceptable.

NOISE AND VIBRATION

- 5.138. Paragraph 187 of the NPPF (2025) states that planning policies and decisions should contribute to and enhance the natural and local environment by preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability.
- 5.139. Policy EM8 'Land, Water Air and Noise' of the Local Plan Part 1 (2012) states that the Council will seek to ensure that noise sensitive developments and noise generating development and only permitted if noise impacts can be adequately controlled and mitigated.
- 5.140. Policy D3 'Optimising site capacity through the design-led approach' of the London Plan (2021) states that development should help prevent or mitigate the impacts of noise and poor air quality.
- 5.141. Policy D13 'Agent of Change' of the London Plan (2021) states that the Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them. New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses. Development proposals should manage noise and other potential nuisances by:
- 1) ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area
 - 2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations
 - 3) separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, soundproofing, insulation and other acoustic design measures.
- 5.142. The above is echoed by Policy D14 'Noise' of the London Plan (2021) states in order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:
- 4) avoiding significant adverse noise impacts on health and quality of life
 - 5) reflecting the Agent of Change principle as set out in Policy D13 Agent of Change
 - 6) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
 - 7) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)
- 5.143. This Application is accompanied by a Noise Assessment, prepared by Trium. It should be noted that the survey the survey methodology has sought to ensure a robust understanding of the surrounding noise context from adjacent industrial occupiers considering the Agent of Change principles as stipulated by the London Plan.

- 5.144. The assessment concludes that appropriate internal and external noise conditions will be provided in all newly proposed accommodation with the adoption of appropriately specified acoustic measures.
- 5.145. In addition, it is considered achievable that any proposed residential properties in proximity to neighbouring industrial uses can be designed to mitigate against noise from these sources (in accordance with the Agent of Change principle), where required. A detailed mitigation scheme is proposed to be reserved via suitably worded planning condition in due course.
- 5.146. On this basis, the Proposals are considered appropriate (in the context of noise and vibration) for a noise and vibration sensitive development. Planning conditions have been recommended to control noise emissions from building services plant and to ensure that appropriate design measures are adopted to control intrusive noise.

AIR QUALITY

- 5.147. Paragraph 199 of the NPPF (2025) states that planning policies and decisions should take into account presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas.
- 5.148. LBH declared an Air Quality Management Area in September 2003 which covers the Borough from the Chiltern-Marylebone railway line southwards. Following on from this, an Air Quality Action Plan was approved by the Council in 2004. In conjunction with other bodies, this aims to put in place measures to reduce air pollutant emissions and improve local air quality.
- 5.149. Part A of Policy DME1 14 'Air Quality' of the Local Plan Part 2 (2020) states that development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants. Part B requires development proposals as a minimum to be at least "air quality neutral, include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new, and actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.
- 5.150. The Site is located in an Air Quality Management Zone. As such, an Air Quality Assessment has been prepared by AQC and is submitted as part of this application. From a construction impact perspective, the results of the assessment of construction traffic demonstrates that pollutant concentrations will be well below the respective objectives at all existing receptors in 2026, with or without the construction activity associated with the proposed development.
- 5.151. Furthermore, the emissions from the construction traffic generated by the proposed development will have a negligible impact on air quality conditions at all existing receptors along the local road network. The overall air quality effects during the construction of the proposed development are therefore judged to be 'not significant'.
- 5.152. From an operational perspective, the overall operational air quality effects of the proposed development are judged to be 'not significant'. Regarding 'Air Quality Neutral' matters, there will be no direct building emissions at the proposed development and transport related emissions associated with the proposed development are below the relevant benchmarks. The proposed development therefore complies with the requirement that all new developments in London should be at least air quality neutral.
- 5.153. A climate change, resilience and adaptation assessment has also been prepared, the results of this assessment has identified that there are no significant effects on users, buildings and infrastructure or landscaping and biodiversity, which have been identified as key receptors.

5.154. A greenhouse gas emissions assessment has also been prepared, the results has identified that the proposed development will lead to GHG emissions; however, these are described as Minor Adverse and therefore 'not significant' in accordance with IEMA guidance. This conclusion is based on:

- the GHG emissions generated by the proposed development being small in the context of local, regional (GLA-wide) and national emissions and GHG budgets;
- the proposed development being compliant with all relevant policies relating to GHG and climate change; and
- the proposed development will not conflict with or prevent the UK meeting its net zero GHG emissions target of 2050.

5.155. Design measures can be implemented to avoid and reduce the GHG emissions, which follows the key principles in the IEMA guidance and is consistent with the requirements of relevant policy.

5.156. Overall, the Proposed Development is acceptable in air quality terms at this stage, and we propose that a detailed Air Quality Assessment be submitted as part of any future Reserved Matters Application to help further ensure this in due course.

AVIATION

5.157. Policy DMAV 1 'Safe Operation of Airports' of the Local Plan Part 2 (2020) states that the Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas.

5.158. The Site is located in an aeronautical safeguarding zone for Heathrow Airport. As such, the Proposed Development has been assessed by KL Grant against relevant aviation safeguarding criteria associated with operations at London Heathrow Airport and Northolt Aerodrome.

5.159. The results of the preliminary assessment indicate that the proposed development is outside of the technical safeguarding frames indicated in CAA guidance to be areas of particular concern. It is expected that development up to the OLS height limits at this location will not impact on-airport navigational aids.

5.160. The potential for tall buildings in the area of the proposed development to impact on the H10 radar located at London Heathrow is identified. NATS has assessed the proposal and indicated that it deems it to have an unacceptable impact on the H10 radar in the, however, this impact can be mitigated through planning conditions requiring a radar mitigation scheme to be agreed.

5.161. Overall, the Proposed Development is considered acceptable from an aviation safeguarding position.

Planning Obligations

5.162. The Applicant would like to discuss the scope of any S106 planning obligations required in this instance at post-submission stage and agree the associated Heads of Terms at an early stage.

6.0 SUMMARY AND CONCLUSIONS

6.1. This Planning Statement accompanies an Outline Planning Application submitted on behalf Columbia Threadneedle Investments (“the Applicant”). This application follows extensive pre-application engagement with London Borough of Hillingdon (LBH) and Officers at the GLA. Outline planning permission for the redevelopment of Hyde Park Hayes, UB3 4AZ (“the Site”) is sought as follows:

“Outline planning permission (with all matters reserved excluding access) for demolition of existing buildings (above basement level) and phased delivery of residential development (Class C3), flexible residential / commercial floorspace, new public realm, landscaping, play space, car parking, cycle parking and associated works.”

6.2. Approval of access is sought at the Outline application stage with all other matters reserved. Illustrative material is provided to demonstrate how a development of the scale and nature proposed can be accommodated.

6.3. The submitted Parameters Plans are informed by site constraints and technical assessments forming part of this application. These plans propose the following matters for approval:

- Parameter Plan 1 – defines the maximum building footprint and identifies the “Proposed “Development Zone”.
- Parameter Plan 2 – outlines areas for vehicular access, vehicle parking, pedestrian friendly zones, and new pedestrian crossings.
- Parameter Plan 3 – shows the areas designated as public realm and streetscape, private front gardens and illustrative locations of public open space.
- Parameter Plan 4 – sets out the maximum building heights within each zone (67.9m AOD maximum).
- Parameter Plan 5 – illustrates the land use, majority residential Use Class C3 with a small section for flexible commercial space Use Class E.
- Parameter Plan 6 – outlines the existing trees to be retained, trees to be removed and the proposed tree planting.

6.4. Detailed consideration of appearance, landscaping, layout and scale are reserved and will be considered in compliance with the above at a future stage via submission of a Reserved Matters application.

6.5. A suite of technical reports has been prepared and submitted as part of this planning application. The Planning Statement is one of those reports and provides a detailed planning policy analysis, considering the Proposed Development in the light of the relevant policies of the adopted Development Plan, as well as other material considerations.

6.6. The planning policy analysis concludes that the Proposed Development accords with the statutory development plan and national planning policy guidance. A summary of the key conclusions is set out as follows:

- The principle of residential development is acceptable and responds to key policies and an identified local housing need.

- The loss of office floorspace is considered acceptable, given the current vacancy rates on-site (and given overriding need for new homes).
- Transport impacts are considered to be acceptable. The reduction in car parking is supported by local and regional planning policy.
- The maximum parameters, including building heights, have been robustly tested in townscape and environmental terms (including daylight and sunlight and wind) and overall, the proposed re-development approach is considered to be robust and justified from a technical perspective.

6.7. In summary, we have identified that the Proposed Development accords with key statutory development plan and national planning policies and guidance. It also comprises a sustainable form of development that would give rise to considerable social and environmental benefits to be factored into the overall planning balance including:

- Delivery of significant and much-needed new housing on a highly-accessible, previously-developed site – in short, given that up to 673 residential dwellings are proposed to be delivered on-site, the Proposals are capable of making an undeniable contribution to local housing need.
- Delivery of flexible ancillary residential / commercial uses at ground level at key-locations on-site, in addition to securement of other means of active frontage throughout the proposals. This approach will help to ensure a strong sense of place and street scheme throughout the scheme.
- Securing high-quality architecture in the future, at Reserved Matters stage, through establishment of robust design coding. The submitted Design Code provides a comprehensive framework to inform future redevelopment proposals.
- The submitted Parameter Plans and Design Code will also ensure, and underpin, the delivery of high-quality and well-designed new homes on-site – as demonstrated through submission of our Illustrative Scheme, these parameters and design principles are capable of delivering an exemplary scheme at Reserved Matters stage which performs well in relation to key design and environmental criteria (including wind microclimate and daylight, sunlight and overshadowing considerations).
- The proposals provide local employment and training opportunities through the flexible commercial unit proposed, there will also be opportunity for employment through temporary construction work. The proposals will therefore result in local economic benefits.
- A significant reduction in car parking provision on-site, in accordance with key policy objectives. The proposals will also include 1,210 cycle parking spaces, therefore helping to promote sustainable transport modes.
- The proposals will deliver significant new, accessible and permeable public realm through the Site, promoting pedestrian priority. The outline proposals are supported by a detailed landscaping strategy, seeking to ensure a high-quality landscaped approach in the future.
- As supported by our Illustrative Scheme, the maximum parameters proposed are capable of delivering up to play 1,752m² child's play space (with specific details to come forward at Reserved Matters Application stage in due course).

6.8. The presumption in favour of granting planning permission therefore applies in accordance with Paragraph 11 (c) of the NPPF.

6.9. On this basis we would respectfully request that the application is approved without delay.

APPENDIX 1

HAYES OFFICE MARKET OVERVIEW

HYDE PARK, HAYES



Overview

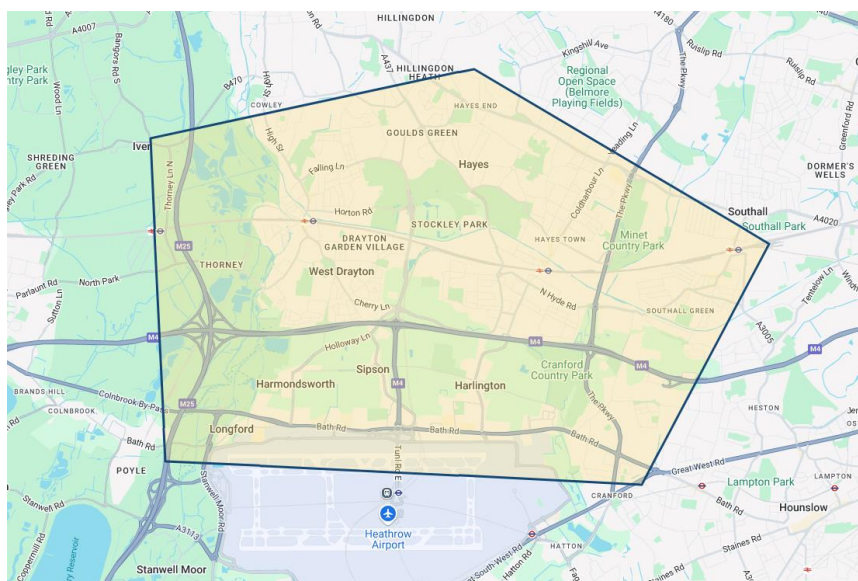
Montagu Evans have been asked by the client (Columbia Threadneedle Investments) to provide an overview of the office leasing market in Hayes. The data and evidence below conclusively demonstrates a clear supply/demand imbalance characterised by a surplus of vacant office floorspace in conjunction with diminishing occupier demand evidenced by relatively low annual take-up figures.

Subject property overview

Building	Size	Spec	Tenancy info
HPH2	63,576 sq ft NIA	Built in 1977 and renovated in 2010. Fair quality commensurate with age.	Rackspace occupy the 2 nd floor (20,289 sq ft). IG index occupy the ground floor (21,089 sq ft NIA), with a lease expiring 30/06/2025
HPH5	124,470 sq ft NIA	Built 2015. Fair quality with previous tenant fitout in situ e.g. slides / pitch and putt / auditorium	Vacant (was previously entirely let to Rackspace, who could not get their staff back to the office after Covid). Built as an HQ building, making subdivision challenging.
One Hyde Park (not within OPA)	91,677 sq ft NIA	Built 1976, fully refurbished 2019. Grade A specification	Ground floor (20,381 sq ft) was let to international technology tenant (confidential) in 2023. The remainder of the building (71,296 sq ft) has remained vacant since the buildings' refurbishment.

Parameters

This analysis is predominantly focussed within the geography delineated below.



HAYES OFFICE MARKET OVERVIEW

HYDE PARK, HAYES



Total Stock

5.5m sq ft

(source: Costar)

Competing availability sq ft: 800,000 sq ft (ref. overleaf - source: Kato / Agents society)

Vacancy rate: 14.55%

Take-up per annum:

Year	Take Up (Sq Ft)
2025 YTD	59,489 sq ft
2024	102,304 sq ft
2023	125,906 sq ft
2022	235,748 sq ft
2021	48,678 sq ft
2020	98,652 sq ft

Source: Costar

5 year average (2020-2025): **121,658 sq ft**

The 5 year average take-up equates to 15.2% (or 6.6 years worth) of total supply.

Recent Letting Comparables (within past 12 months):

Date	Property	Tenant	Term Certain (Breaks)	Size (sq ft)	Rent (psf)	Comments
Mar-25	5 The Square, Stockley Park	ICTS	5	6,070	£36.00	Refurbished Grade A
Mar-25	6 Roundwood Avenue, Stockley Park	Reckitt Benckiser	10	52,399	£36.00	Extensively refurbished (back to frame) Grade A
Dec-24	3 Roundwood Avenue, Stockley Park	Practice Plus Group	5	9,610	£34.00	Extensively refurbished Grade A
Nov-24	284 Bath Road	Beumer UK	TBC	3,552	£25.00	Grade B
Nov-24	World Business Centre, Bath Road	Nippon Express	TBC	7,222	£27.00	Refurbished Grade A
Aug-24	2 Bath Road	Barbican Logistics	5	6,370	£23.00	Grade B

Source: Costar

The most significant letting in the past 12 months has undoubtedly been Reckitt Benckiser's 52,399 sq ft occupation at 6 Roundwood Avenue. This is the largest letting in the submarket in the past 2 years by some margin.

Aside from this, there has been a dearth of lettings, notably over the 20k sq ft size bracket aside from Keyence taking 24,000 sq ft at 1 Furzeground Way in Q1 2023, and the ground floor letting at the subject property.

HAYES OFFICE MARKET OVERVIEW

HYDE PARK, HAYES







Rents

Year	Quote rents
2025 YTD	£30.25psf
2024	£30.25psf
2023	£30.75psf
2022	£31.25psf
2021	£32.00psf
2020	£32.50psf
2019	£32.50psf
2018	£34.00psf
2017	£34.50psf
2016	£30.00psf
2015	£23.00psf

Source: Costar

A steady decline in quoting rents within the submarket since its peak in 2017 is symptomatic of a significant oversupply in conjunction with dwindling occupier demand.






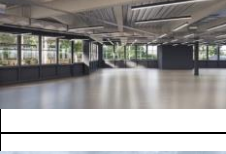



Competing Availability (OAS Heathrow defined submarket).

Property	Photo	Area (sq ft)	Quoting Rent psf	Comments
4 The Square, Stockley Park		15,424 sq ft	Non-quoting	<ul style="list-style-type: none"> EPC B 1:230 sq ft parking Refurbished
1 Mondial Way, Heathrow		10,277 sq ft	£27.50psf	<ul style="list-style-type: none"> EPC A 1:214 sq ft parking Refurbished
3 Roundwood Avenue, Stockley Park		40,387 sq ft	Non-quoting	<ul style="list-style-type: none"> EPC B 1:283 sq ft parking Grade A refurbished
6 Roundwood Avenue, Stockley Park		52,405 sq ft	£39.00psf	<ul style="list-style-type: none"> EPC A 1:306 sq ft parking Grade A

HAYES OFFICE MARKET OVERVIEW

HYDE PARK, HAYES






3 World Business Centre, Hounslow		17,433 sq ft	£29.50psf	<ul style="list-style-type: none"> • 1:318 sq ft parking • Refurbished
2 World Business Centre, Hounslow		7,190 sq ft	£29.50psf	<ul style="list-style-type: none"> • 1:318 sq ft parking • Refurbished
1 World Business Centre, Hounslow		10,927 sq ft	£29.50psf	<ul style="list-style-type: none"> • 1:318 sq ft parking • Refurbished
Record Store, Hayes		64,203 sq ft	£28.50psf	<ul style="list-style-type: none"> • EPC B • 1:420 sq ft parking • Grade A
3 The Square, Stockley Park		92,283 sq ft	Non-quoting	<ul style="list-style-type: none"> • 1:239 sq ft parking • Grade A
2 The Square, Stockley Park		33,540 sq ft	£32.50psf	<ul style="list-style-type: none"> • CAT A+ • 1:247 sq ft parking
4 Longwalk, Stockley Park		38,465 sq ft	£39.00psf	<ul style="list-style-type: none"> • EPC A • 1:287 sq ft parking • Fitted
5 The Square, Stockley Park		57,668 sq ft	£37.50psf	<ul style="list-style-type: none"> • EPC A • Refurbished Grade A
Shipping Building, Hayes		38,998 sq ft	£29.50psf	<ul style="list-style-type: none"> • Fully refurbished Grade A • 1:377 sq ft parking

HAYES OFFICE MARKET OVERVIEW

HYDE PARK, HAYES



3 Longwalk Avenue, Stockley Park		108,256 sq ft	£24.00psf	<ul style="list-style-type: none"> EPC D 1:254 sq ft parking Grade B
One Longwalk, Stockley Park		74,954 sq ft	Non-quoting	<ul style="list-style-type: none"> 1:323 sq ft parking Grade B
1 Furzeground, Stockley Park		17,075 sq ft	£38.50psf	<ul style="list-style-type: none"> EPC A Grade A refurbished
4 World Business Centre, Hounslow		31,000 sq ft	Non-quoting	<ul style="list-style-type: none"> Fully fitted Secondary
6-9 The Square, Stockley Park		25,000 sq ft	Serviced	<ul style="list-style-type: none"> Fully fitted, serviced Secondary
3 Furzeground, Stockley Park		46,024 sq ft	£33.50psf	<ul style="list-style-type: none"> EPC C 1:298 sq ft parking Refurbished
1 Heathrow Boulevard, Heathrow		18,958 sq ft	£25.00psf	<ul style="list-style-type: none"> 1:288 sq ft parking Grade B

Source: Kato / Agents Society

Competing availability in the Heathrow submarket amounts to circa 800,000 sq ft (not including the vacancy at the subject property). The bulk of this supply is within Stockley Park.

It is worth highlighting that a lot of this stock, including 3 Furzeground Way, 5 The Square, 4 Longwalk, 1 Furzeground Way and 1 Heathrow Boulevard have been vacant since 2020.

HAYES OFFICE MARKET OVERVIEW

HYDE PARK, HAYES



Current Office Requirements > 5,000 sq ft (OAS Heathrow defined submarket).

Date Circulated	Agent	Size	Sector	Location	Comments
May-25	Newsteer	40k – 60k sq ft	TBC	Chiswick, Hammersmith, Kensington & Chelsea, Acton, Shepherd's Bush, M4 Corridor	Pre-let
May-25	Savills	15k – 20k sq ft	Professional	Hammersmith, M4 Corridor (SL to W7), Heathrow, Uxbridge, Richmond (Upon Thames), Slough, Chiswick, Hammersmith, Ealing, White City	Occupation end of the year
May-25	Vail Williams	10k – 15k sq ft	TBC	Slough	Ground floor options preferred (building with goods lift may work) Flexible lease options
Apr-25	Hicks Baker	14k – 16k sq ft	TBC	Slough, Maidenhead, Windsor, Egham, Staines and surrounds	Grade A offices with good parking required, ideally on single floor, for occupation by Q3 2025.
Apr-25	Newmark	20k – 30k sq ft	Retail & leisure	M4 Corridor	Looking for 20-30,000 sq ft on M4 corridor and surrounds. Preference for fitted space but reporting all options at this stage. Single floor ideally but will consider 2.
Apr-25	JLL	15k – 25k sq ft	Manufacturing	Heathrow & Uxbridge	Stay v Go feasibility exercise on behalf of retained client. Preference for good quality space with excellent car parking provision on as few floors as possible.

Source: Kato / Agents Society

Live requirements (dating back to the start of April 2025) total (up to) 166,000 sq ft. It should be noted that a large number of these tenant requirements cover wider geographical areas than just Hayes or the Heathrow submarket i.e. the M4 corridor. Some requirements are also circulated as a stay vs. go exercise whereby occupiers evaluate costs of a relocation from their existing premises. Given the immense cost of relocation this often results in the tenant ultimately staying put.

This equates to just 20% of competing supply.

Summary

Given the supply/demand dynamics within this submarket, we would expect vacancy levels to remain high and therefore headline rents to fall or stagnate in the short to medium term. Non-core office markets such as Heathrow and Hayes continue to experience the significant impacts of the post-Covid hybrid working model which has seen corporates consolidate their office footprints. Whilst a handful of employers have more recently announced corporate policies mandating physical office attendance, we would note that this has been piecemeal, and would only expect core regional markets and central London to realise any material demand uplift should there be further widescale adoption.

HAYES OFFICE MARKET OVERVIEW

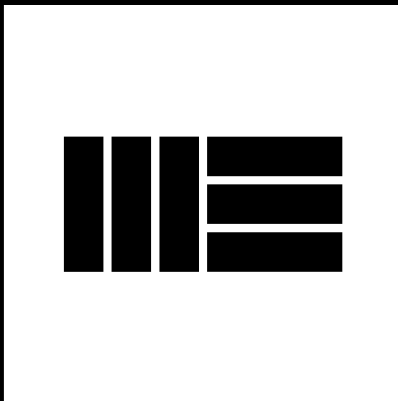
HYDE PARK, HAYES



This location, along with many other regional and OOT markets across the UK, will continue to see even good quality office buildings remain redundant whilst there is a clear oversupply, and whilst occupier demand levels remain low.

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WE REQUEST THAT THESE BE TREATED AS CONFIDENTIAL.