

HERITAGE, TOWNSCAPE AND VISUAL IMPACT ASSESSMENT

HYDE PARK, HAYES, UB3 4AZ

JULY 2025



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1.0 INTRODUCTION

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INTRODUCTION

1.1 Montagu Evans LLP has been instructed by Columbia Threadneedle Investments (the ‘Applicant’) to provide consultancy services and produce this Heritage, Townscape and Visual Impact Assessment (the ‘HTVIA’) to support redevelopment proposals at Hyde Park, Hayes, UB3 4AZ (the ‘Site’).

THE SITE

- 1.2 The Site covers approximately 2.47 hectares, as shown in **Figures 1.1 and 1.2**. It comprises two commercial buildings and a multi-storey car park, forming part of the Hyde Park commercial complex, which includes business and retail uses. The existing buildings are 4–5 storeys high with generous floor-to-floor heights.
- 1.3 The Site is bounded by North Hyde Road (A437) to the north and Millington Road to the south, which provides access to an Asda Superstore car park. Vehicle access is available from the Dawley Road/ North Hyde Road roundabout to the west and from Millington Road, with a pedestrian access point along the southern edge of North Hyde Road. A small residential pocket is located to the north between North Hyde Road and the Great Western Railway Line, defined by Keith Road. The wider surrounding area is predominantly residential to the south, west, and east.
- 1.4 The Site lies about 500m south-west of Hayes & Harlington Station and is within walking distance of the town centre and local amenities. It has good public transport access, reflected in its PTAL rating of 4, and sits within an emerging cluster of taller developments, including Keith House (Eastern and Western sites).
- 1.5 The Site is not within a conservation area and contains no statutorily or locally listed buildings. The nearest listed building is the Grade II Enterprise House, located about 300m north within the Botwell: Thorn EMI Conservation Area, which includes five locally listed buildings. Hayes & Harlington Station, also locally listed, is around 500m north-east, and the Botwell: Nestlé Conservation Area lies approximately 625m east. Stockley Park, a Grade II Registered Park and Garden, is situated about 800m north-east, beyond a mix of industrial, commercial, and emerging residential development, and to the north of the Grand Union Canal.

THE PROPOSED DEVELOPMENT

- 1.6 The proposals comprise the demolition of all existing buildings on the Site and redevelopment to provide 662 residential units (the ‘Proposed Development’). The formal description of development is as follows:
- Outline planning permission (with all matters reserved excluding access) for demolition of existing buildings (above basement level) and delivery of residential development (Class C3), flexible residential / commercial floorspace, new public realm, landscaping, play space, car parking, cycle parking and associated works*
- 1.7 The proposals have been developed with consideration to the Site’s context, including the relationship with heritage assets, surrounding townscape context and potential effects on visual receptors. The design development has been aided by pre-application engagement with planning officers at the London Borough of Hillingdon (also referred to as the ‘Local Planning Authority’, the ‘LPA’ or the ‘Council’).
- 1.8 The planning application is submitted in outline, with all matters reserved excluding access. The outline component is delivered through ‘Control Documents’ comprising a suite of Parameter Plans and a Design Code. The Control Documents have been prepared by TP Bennett, alongside a Design and Access Statement.
- 1.9 The assessment is supported by a series of 23 verified views provided at Appendix 3 that illustrate the maximum parameters – such as the building footprint and height – in wire line (AVR1). Each view also includes an illustrative scheme –shown in chalk massing (AVR2) without rendered materials – showing how a reserved matters application may come forward in accordance with the Control Documents. The illustrative scheme is for information only and does not form part of the assessment.
- 1.10 The location of the viewpoints has been informed by architectural and historic accounts of the area, an appraisal of the existing Site and surroundings, and relevant policy designations. Viewpoints have been agreed with officers at the Council through the pre-application consultation process. Further information on locations of viewpoints which have been used to inform design development stages of the Proposed Development, as well as assessment stages, is included at **Section 7.0**.

PURPOSE OF REPORT

- 1.11 This report outlines the heritage, townscape and visual considerations for the Site and provides an assessment of potential impacts of the Proposed Development upon that context.
- 1.12 The (built) heritage assessment outlines the significance and contribution made by setting of heritage assets in the surrounding area that may be impacted by the Proposed Development. Owing to separating distances, intervening development, extent of change and the existing character of the Site, forming large-scale commercial units within an urban context, it is not considered that the redevelopment of the Site stands to introduce a change to the setting of Stockley Park or the Botwell: Nestle Conservation Area that may impact their significance; consequently, both assets have been scoped out of this HTVIA. Such scoping has been informed by an understanding of the Site and its context through site visits, as well as the findings of a Zone of Theoretical Visibility (the ‘ZTV’), prepared using VuCity software (see **Section 2.0**).
- 1.13 The townscape assessment will consider the Proposed Development within its urban context, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces and the relationships between buildings and open spaces.
- 1.14 The visual assessment considers the impact of the Proposed Development upon visual receptors. The assessment relates to how people will be affected by changes in views and visual amenity at different places, including publicly accessible locations. Visual receptors are always people (although usually visual receptors are defined according to use e.g. residential, business, road, footpath etc.), rather than landscape features.
- 1.15 The Site is not located within any wider and regional strategic views (including those identified in the 2012 London Views Management Framework), nor is it situated within any locally identified viewing corridor.

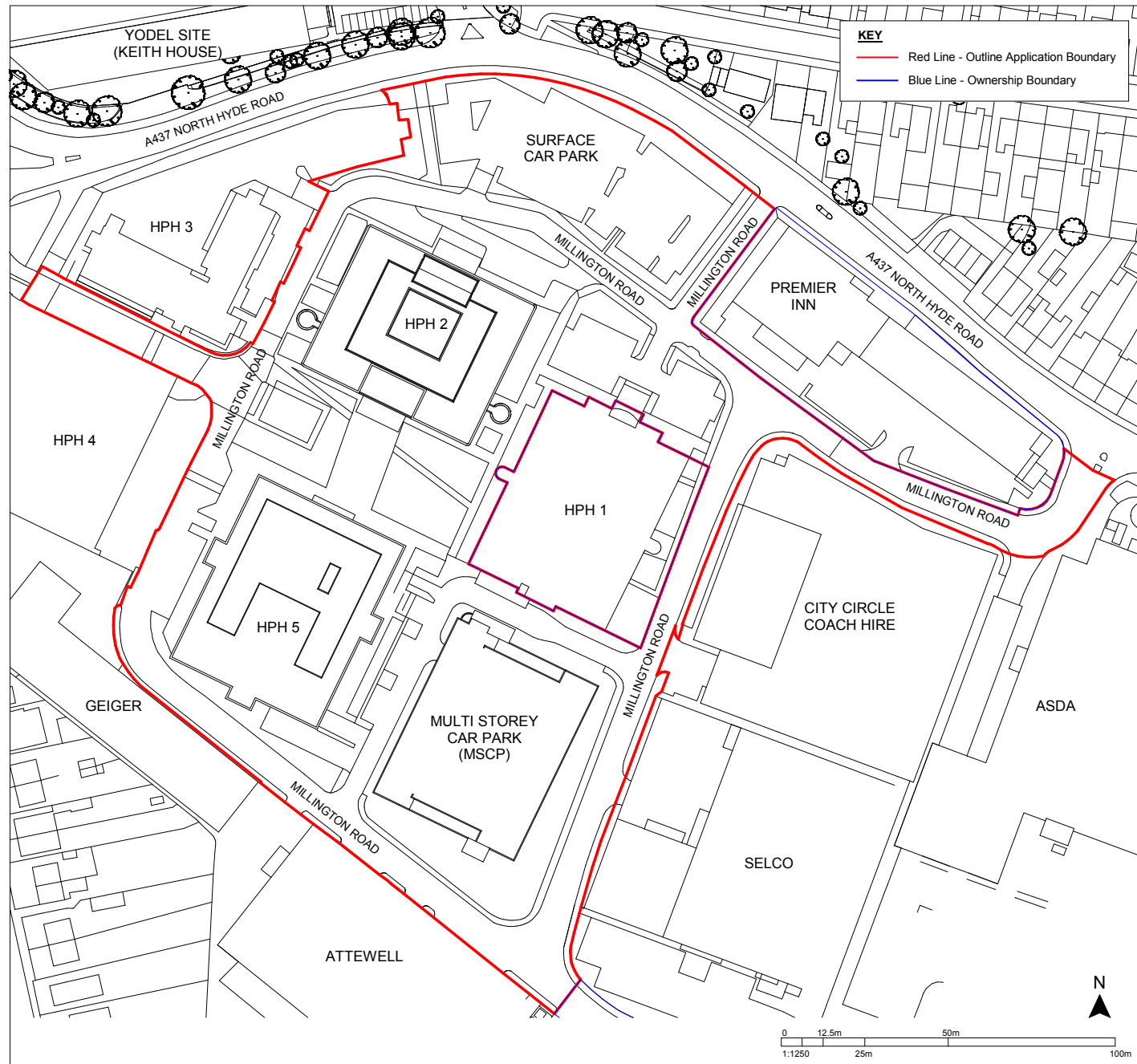


Figure 1.1 Existing Site Plan



Figure 1.2 Existing Satellite Image

STRUCTURE OF REPORT

- 1.16
- The report is structured as follows:
- **Section 2.0** describes the methodology that has been used to undertake this assessment;
 - **Section 3.0** sets out the legislation and planning policy which is relevant to the assessment of the proposals on heritage assets, townscape and visual amenity;
 - **Section 4.0** provides a description of the historical development of the Site and surrounding area;
 - **Section 5.0** sets out the significance and contribution made by setting of heritage assets which have the potential to be affected by the Proposed Development;
 - The existing townscape character is assessed at **Section 6.0**;
 - A description of the existing visual amenity is provided at **Section 7.0**;
 - **Section 8.0** provides an assessment of the impact of the Proposed Development on the significance of heritage assets;
 - The impact of the Proposed Development on townscape receptors is assessed at **Section 9.0**;
 - An assessment of the impact of the Proposed Development on visual receptors is provided at **Section 10.0**;
 - The report is concluded at **Section 11.0**.

2.0 METHODOLOGY

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METHODOLOGY

2.1 This section provides an overview of the assessment framework. The method is the product of legislation, policy and best practice guidance.

STUDY AREA

- 2.2 The study area comprises:
- 2.2.1 All designated heritage receptors within a 1km radius, including:
 - listed buildings;
 - conservation areas;
 - registered parks and gardens; and
 - scheduled ancient monuments.
 - 2.2.2 Non-designated heritage assets within a 500m radius, including locally listed buildings;
 - 2.2.3 Townscape character areas within 1km radius; and
 - 2.2.4 Visual receptors within a 1km radius.
- 2.3 Site observations, a manual desk-based review of OS maps, characterisation studies and relevant heritage receptors were used to determine the study area. The study area has been informed by building locations and heights, topography and townscape features, and an understanding of the scale of the Proposed Development. The Study area has also been informed by the production of a ZTV (see **Figure 2.1**), using topographically referenced three-dimensional models from VuCity software. The ZTV has been used as a tool to gain a high-level understanding of the extent of visibility of the Proposed Development, which was further interrogated through review of individual viewpoints using field surveys and digital software.
- 2.4 **Section 7.0** identifies viewpoints that have informed the ‘visual study area’. The study area may be defined as the anticipated extent of visibility (from a height of approximately 1.6m (eye level) above the ground). It is acknowledged and accepted that judgments made by a surveyor are subjective, which provides limitations to the identification of a visual envelope. There will be areas within the study area where visibility is not possible e.g. due to interposing development. Conversely, the assessment considers further long distance views where identified and relevant.



Figure 2.1 Zone of Theoretical Visibility – Proposed Max Parameter Model

SITE VISIT

- 2.5 Site surveys of the baseline situation were undertaken by Montagu Evans to understand the immediate setting of the Site and to identify the townscape character and appearance.

ASSESSMENT PROCESS FRAMEWORK
HERITAGE

- 2.6
- The term ‘heritage asset’ is used within this assessment to describe both designated (e.g. Listed Buildings, Registered Park and Garden, Registered Battlefield or Conservation Area) or non–designated (identified by the local authority e.g. building of townscape merit etc) assets. For the purposes of this HTVIA, built heritage receptors do not include archaeological remains.
- 2.7
- Paragraph 207 of the NPPF states:
In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance.
- 2.8
- ‘Significance’ (for heritage policy) is defined in the NPPF (Annex 2) as:
the value of a heritage asset to this and future generations because of its heritage interest. That interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting.
- 2.9
- This is reaffirmed by Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision–Taking in the Historic Environment (2015).
- 2.10
- Where a proposal may have an effect on the surroundings in which the heritage asset is experienced, a qualitative assessment is made of whether, how and to what degree setting contributes to the significance of heritage assets. Setting is defined in the NPPF as:
the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral.

- 2.11
- The assessment of setting is informed by the check–list of potential attributes outlined by the Historic England guidance document Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017) (hereafter “GPA3: Setting”).
- 2.12
- GPA3: Setting identifies five steps towards assessing the implications of development proposals which may affect the setting of heritage assets (it is consistent with other guidance):
a. Identify the assets affected
b. Assessing the contribution setting makes to significance
c. Assessing the effect of the proposed development
d. Maximising enhancement and minimising harm
e. Making and documenting the decision and monitoring outcomes
- 2.13
- Part e is incumbent on the decision maker, through the provision of conditions.

TOWNSCAPE AND VISUAL

- 2.14
- The framework for assessment of townscape and visual impact has been prepared using the Guidelines for Landscape and Visual Impact Assessment, Third Edition (Landscape Institute and Institute of Environmental Management and Assessment, 2013) (‘GLVIA3’). We have also had regard to the methodology set out in An Approach to Landscape Character Assessment (2014) prepared by Natural England.
- 2.15
- The two components of TVIA are:
1. Assessment of townscape effects: assessing effects on the townscape as a resource in its own right; and
2. Assessment of visual effects: assessing effects on specific views and on the general visual amenity experienced by people.

TOWNSCAPE

- 2.16
- Townscape is the “built–up area, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces, and the relationship between buildings and open spaces”, as defined in GLVIA3.
- 2.17
- An initial assessment defined distinct and recognisable patterns of elements, or characteristics that make one area different from another, rather than better or worse. This process, defined as townscape character assessment, is the process of identifying and describing variation in the character of townscape.

- 2.18
- The assessment was informed by both field survey and desk based research of secondary sources, with reference to existing character assessments where applicable. The assessment allowed the description of character areas/types, their key characteristics and for them to be mapped with boundaries. The mapped boundaries suggest a sharp change from one townscape area. On site, however, this often represents a zone of transition. Townscape character areas are identified and assessed according to their built form, materials, maintenance, and statutory and non–statutory designations.
- 2.19
- The objective of identifying the existing context is to provide an understanding of the townscape in the area that may be affected – its constituent elements, its character and the way this varies spatially, its geographic extent, its history, its condition, the way the townscape is experienced and the value attached to it.

VISUAL

- 2.20
- Visual impact assessment relates to how people will be affected by changes in views and visual amenity at different places, including publicly accessible locations. Visual receptors are always people (although usually visual receptors are defined according to use e.g. residential, business, road, footpath etc.), rather than landscape features.
- 2.21
- The aim of the visual baseline is to establish the area in which the development may be visible, the different groups of people who may experience views of the development, the places where they will be affected and the nature of the views and visual amenity at those points.
- 2.22
- The baseline study identifies individuals and/or defined groups of people within the area who will be affected by changes in the views, ‘visual receptors’. The following visual receptors are identified by GLVIA3 as being likely to be the most susceptible to change:
2.22.1 Residents at home;
2.22.2 People, whether residents or visitors, who are engaged in outdoor recreation, including use of public rights of way, whose attention or interest is likely to be focused on the landscape and on particular views;
2.22.3 Visitors to heritage assets, or to other attractions, where views of the surroundings are an important contributor to the experience;
2.22.4 Communities where views contribute to the landscape setting enjoyed by residents in the area.

- 2.23 It should be noted that the assessment does not comprise a ‘residential amenity assessment’, which considers private viewpoints from residential properties. This is separate from townscape and visual assessment (refer to GLVIA3, paragraph 6.17).
- 2.24 Assessment viewpoints were identified based on a comprehensive review of the surrounding area, including the following criteria:

2.24.1 Heritage receptors; and/or

2.24.2 Townscape character; and/or

2.24.3 Where the development may be prominent; and/or

2.24.4 Be visible from concentrations of residential areas; and/or

2.24.5 Open spaces (parkland, publicly accessible space); and/or

2.24.6 Potentially sensitive receptors (e.g. schools); and/or

2.24.7 Accessibility to the public; and/or

2.24.8 The viewing direction, distance and elevation; and/or

2.24.9 Townscape and transport nodes.
- 2.25 The Site is not located within any strategic views as determined by the adopted London View Management Framework (LVMF) (2012).
- 2.26 The visual assessment is supported by Accurate Visual Representations (AVRs), which provide the basis for the assessment of the Proposed Development and its effect on the identified views. Each viewpoint is reproduced in Appendix 3 in the following formats:

2.26.1 **Existing** – baseline photography;

2.26.2 **Proposed** – ‘existing’ plus ‘proposed’, a wireline and ghosted 3D massing entity illustrating the maximum parameters of the Proposed Development;

2.26.3 **Cumulative** – ‘proposed’ plus material consents surrounding the Site; and

2.26.4 **Illustrative Masterplan** – ‘existing’ plus Chalk Massing Render of the illustrative masterplan.
- 2.27 The methodology for the compilation of AVRs prepared by AVR London is provided at Appendix 2.

- 2.28 The objective of a photomontage is to simulate the likely visual changes that would result from a proposed development, and to produce printed images of a size and resolution sufficient to match the perspective in the same view in the field.
- 2.29 Accurate visual representation is two-dimensional and cannot capture the complexity of the visual experience. It is an approximation of the three-dimensional visual experience the observer would receive on site. Neither do they capture transient significant effects arising from noise or traffic on perception, or that wider range of expectations and associations that anyone in an urban scene may have. A visit to the location from which the photographs were taken is strongly encouraged to appreciate and understand the visual impact.
- 2.30 The text accompanying each view seeks to contextualise it. Inevitably one must accept that judgement is involved in this specialist area on the basis of the above and the importance of design quality in the operation of policy. In preparing any written assessment, allowances are made for these factors as well as the assessor’s knowledge of the scheme.

CUMULATIVE EFFECTS

- 2.31 The cumulative schemes subject to this assessment are illustrated in the diagram at **Figure 2.2**, and are listed at **Table 2.1**. The list has been informed by the ZTV, with schemes identified owing to their scale and location relative to the Site, as well as how the Proposed Development will be experienced in the emerging context.

NO.	SITE LOCATION/ PROJECT NAME	LPA REFERENCE
1	The Old Vinyl Factory	59872/APP/2012/1838
2	Land at 3, 233– 236 Nestles Avenue	73238/APP/2018/1145
3	Keith House North Hyde Road Hayes (East Plot)	27189/APP/2021/2782
4	Keith House North Hyde Road Hayes (West Plot)	27189/APP/2020/2181
5	HPH4 Millington Road Hayes	76655/APP/2021/3039
6	Former Nestle Factory, Hayes	1331/APP/2017/1883
7	Land at Bulls Bridge Industrial Estate	7511/APP/2020/1955

Table 2.1 Table of Cumulative Schemes



Figure 2.2 Dimetric View of Cumulative Schemes

3.0

LEGISLATION AND PLANNING POLICY

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LEGISLATION AND PLANNING POLICY

3.1 The following section sets out the planning policy context for the Site and for the context of the assessment process.

LEGISLATION

PLANNING (LISTED BUILDINGS AND CONSERVATION AREAS) ACT 1990

3.2 The Planning (Listed Buildings and Conservation Areas) Act 1990 (the ‘1990 Act’) provides the statutory duties of a decision maker in respect of development proposals which have the potential to affect listed building and conservation areas.

3.3 The Site does not contain any statutorily listed building and is not located within a conservation area, so the statutory provisions at Section 16(2) and Section 72(1) of the 1990 Act do not apply. The Site is located within the vicinity of a number of listed buildings and so Section 66(1) of the 1990 Act is therefore applicable to the Site’s redevelopment. Section 66(1) states:

“In considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority or, as the case may be, the Secretary of State shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.”

DEVELOPMENT PLAN

3.4 Section 38(6) of the Planning and Compulsory Purchase Act 2004 stipulates that where in making any determination under the Planning Acts, regard is to be had to the development plan, and the determination must be made in accordance with that plan unless material considerations indicate otherwise.

3.5 The statutory development plan and the policies relevant to the assessment of heritage, townscape and visual considerations are set out at **Table 3.1** below.

DEVELOPMENT PLAN POLICY	KEY PROVISIONS
London Plan (2021)	Chapter 1: Planning London’s Future – Good Growth Policy GG2: Making the best use of land Chapter 2: Spatial Development Patterns Policy SD1: Opportunity Areas Chapter 3: Design Policy D1: London’s form, character and capacity for growth Policy D3: Optimising site capacity through the design-led approach Policy D8: Public Realm Policy D9: Tall Buildings Chapter 7: Heritage and Culture Policy HC1: Heritage Conservation and Growth Policy HC3: Strategic and Local Views
Hillingdon Local Plan – Parts 1 (2012) and 2 (2020)	Local Plan Part 1 – Strategic Policies Policy HE1: Heritage Policy BE1: Built Environment Local Plan Part 2 – Development Management Policies Policy DMHB 1: Heritage Assets Policy DMHB 2: Listed Buildings Policy DMHB 3: Locally Listed Buildings Policy DMHB 4: Conservation Areas Policy DMHB 10: High Buildings and Structures Policy DMHB 11: Design of New Development Policy DMHB 12: Streets and Public Realm

Table 3.1 Development Plan Policy Relevant to HTVIA

3.6 **NATIONAL POLICY**
The development plan is supported by the planning policies set out in the NPPF. The relevant provisions are set out at **Table 3.2**.

NATIONAL POLICY	KEY PROVISIONS
National Planning Policy Framework (NPPF) 2025	Chapter 12 (Achieving well-designed places) <ul style="list-style-type: none">Paragraph 131Paragraph 134Paragraph 135Paragraph 136Paragraph 137Paragraph 139 Chapter 16 (Conserving and enhancing the historic environment) <ul style="list-style-type: none">Paragraph 207Paragraph 210Paragraphs 212–216

Table 3.2 National Planning Policy Relevant to HTVIA

MATERIAL CONSIDERATIONS

3.7 In addition to legislation and policy, the assessment will take into consideration relevant planning guidance and any material considerations, including:

- National Planning Practice Guidance (online)
- Guidelines for Landscape and Visual Impact Assessment Third Edition (GLVIA) (2013)
- An Approach to Landscape Character Assessment (2014)
- TGN 06/19 Visual Representation of Development Proposals Technical Guidance Note (2019) prepared by Landscape Institute
- Historic England, Historic Environment Good Practice Advice in Planning Note 2: Managing Significance in Decision-Taking in the Historic Environment (2015)
- Historic England, Historic Environment Good Practice Advice in Planning Note 3: The Setting of Heritage Assets (2017)
- Historic England Advice Note 4: Tall Buildings (2022)
- IEMA, ClfA and IHBC Principles for Cultural Heritage Impact Assessment (2021)
- National Design Guide (2019)
- London Borough of Hillingdon/ Urban Initiative Studio, Hillingdon Townscape and Character Study (2023)

THE EMERGING LOCAL PLAN

- 3.8 The Council are currently consulting on their new Local Plan, with the Regulation 18 Consultation closing on the 24th June 2024. An updated Regulation 19 Consultation Draft Local Plan is expected to be published later this year (2025) for further consultation, with submissions to the Secretary of State expected in August 2026. Adoption of the new Local Plan is anticipated for June–July 2027.
- 3.9 The Regulation 18 Consultation Draft included a suite of evidence documents, including the Hillingdon Townscape Character Study 2023 (discussed further below).

POLICY DISCUSSION

HILLINGDON LOCAL PLAN AND OPPORTUNITY FOR HIGH DENSITY DEVELOPMENT

- 3.10 Part 1 of Hillingdon’s Local Plan was adopted in November 2012, following the publishing of the National Policy Framework in March of the same year. The Local Plan includes a suite of Strategic Policy Objectives which were written to guide development within the borough through until 2026.

PRINCIPLE OF HIGHER DENSITY DEVELOPMENT

- 3.11 The Site is located within the Hayes Opportunity Area, part of the wider Heathrow Opportunity Area. The area is identified by the London Plan as having a capacity to provide a minimum of 9,000 new homes, and 12,000 additional jobs.
- 3.12 The Local Plan (Policy DMHB 10: High Buildings and Structures) notes that tall buildings may be acceptable in only a limited number of locations, including Uxbridge and Hayes town centre, subject to the Council preparing a characterisation study and tall buildings assessment.
- 3.13 The Site is located close to the south-western boundary of Hayes Town Centre, and is situated on the edge of the Hayes Housing Zone (see Figure 3.1).

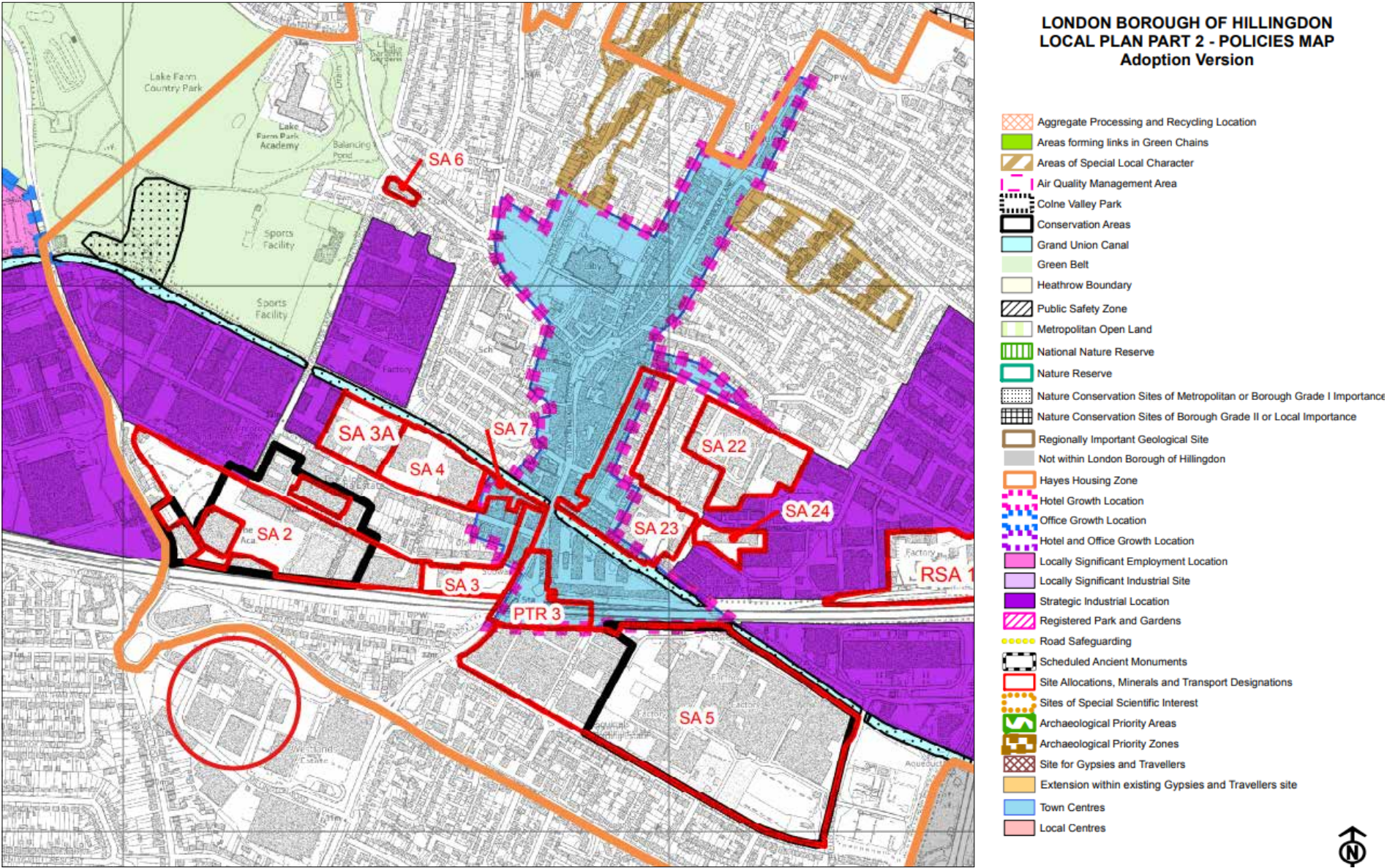


Figure 3.1 Extract from Hillingdon Local Plan Policies Map, illustrating the Site’s location (circled in red) relative to the Town Centre and Housing Zone

- 3.14 The Hillingdon Townscape and Character Study (2023) provides guidance to support Strategic Policy BE1, which states that tall building development should ‘not adversely affect their surroundings including 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 considerations relate to Heathrow Airport. Height of tall buildings should be based upon an understanding of the local character and be appropriate to the positive qualities of the surrounding townscape.’
- 3.15 The Townscape Character Study provides further commentary and justification identifying ‘Emerging Context Heights’ (see **Figure 3.2**), illustrating an emerging tall building context within Hayes, to both the north and south of the Great Western Railway.

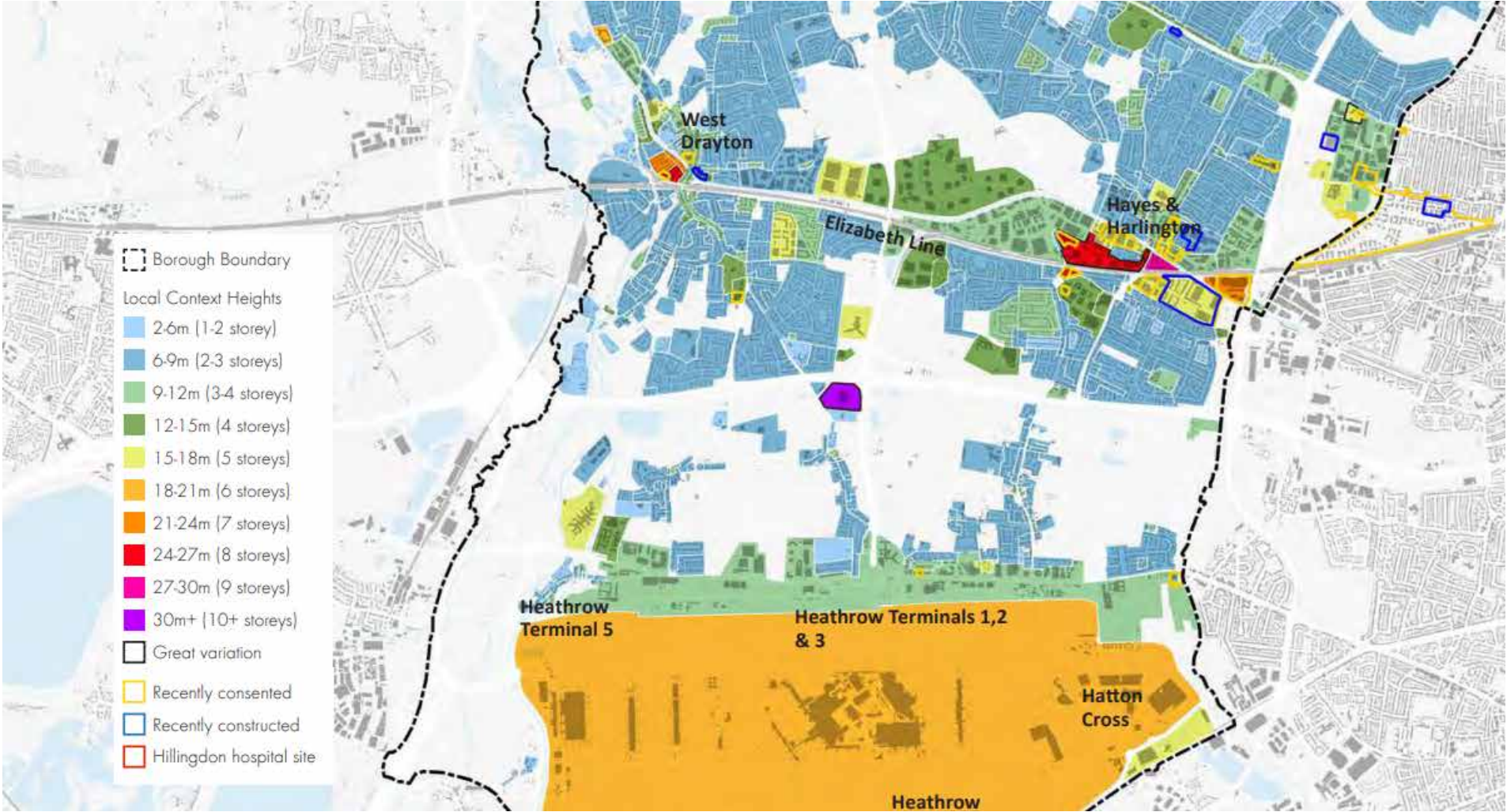


Figure 3.2 Extract from Figure 78, Hillingdon Townscape Character Study (2023), Page 166 (Urban Initiative Studios/ London Borough of Hillingdon)

3.16 The 2023 Character Study identifies two 'height zones' within the borough, with different tall building thresholds. 'Low' areas with a Local Context Height of up to 15m are identified as having a Tall Building Threshold of 21m (7 storeys and above). 'Urban' areas, including 'future' areas (see **Figure 3.3**), with a Local Context Height of above 15m are identified as having a Tall Building Threshold of 27m (equivalent to 9 storeys and above).

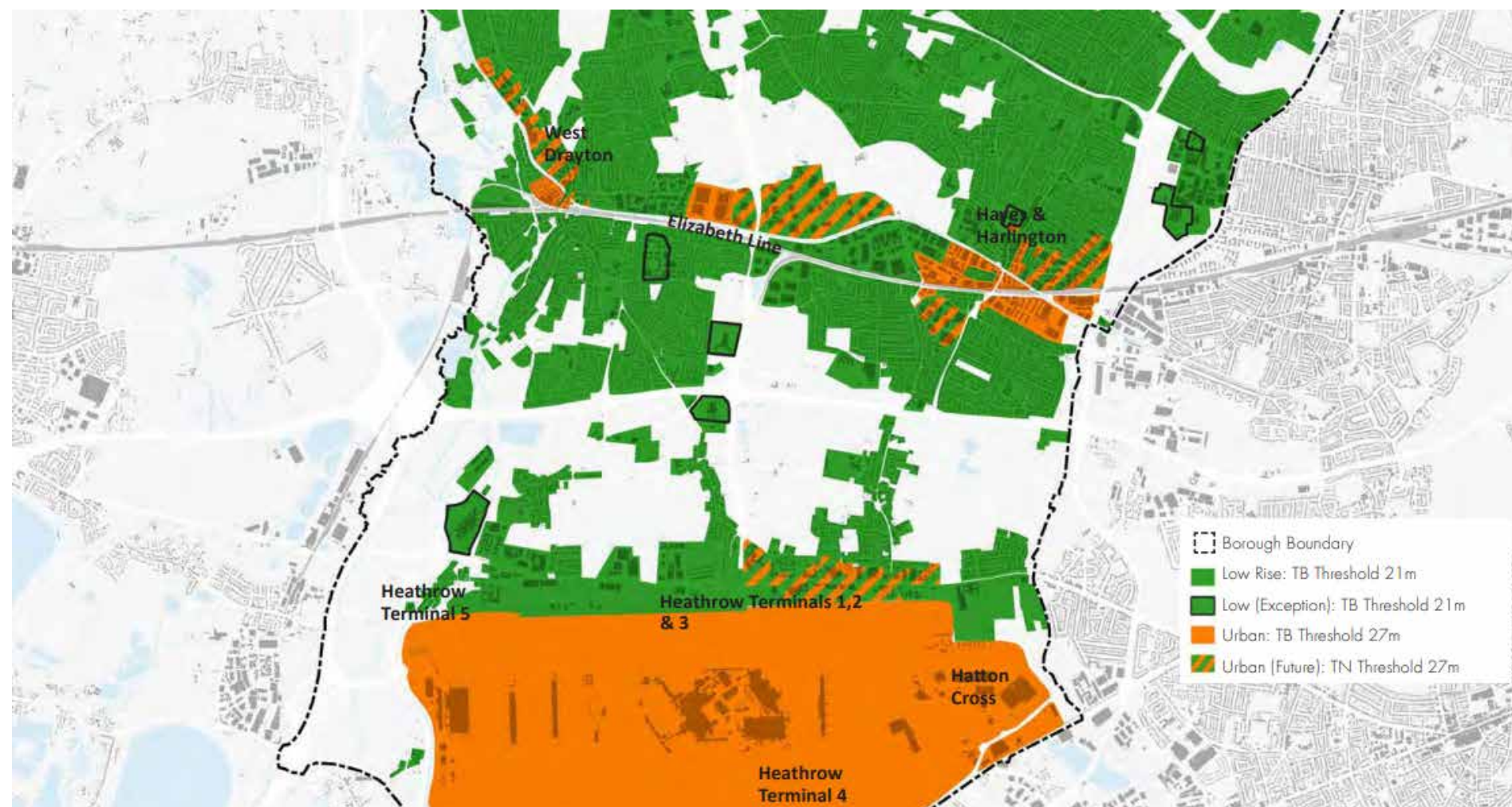


Figure 3.3 Tall Building Threshold Map, Hillingdon Townscape Character Study (2023), Page 169 (Urban Initiative Studios/ London Borough of Hillingdon)

- 3.17 The Site is identified within an ‘Urban (Future) Height Zone’, with a future Local Context Height above 15m and therefore carries a Tall Building Threshold of 27m (meaning any building over 27m will be considered a ‘tall building’).
- 3.18 While the 2023 guidance identifies definitions for tall building development (identified through the identification of the Tall Building Thresholds), it does not provide nor identify locations where tall building development would be considered acceptable. Notwithstanding, the guidance recognises and defines the area within and surrounding the Site as an Urban (Future) Height Zone, while Policy DMHB 10 (High Buildings and Structures) notes that high buildings should be located in Uxbridge or Hayes town centres, or an area identified by the Borough as appropriate for such buildings.
- 3.19 When considering the acceptability of tall building development on the Site, it is important to consider the Character Study’s findings in relation to the emerging urban context and also turn to site-specific considerations to determine the Site’s appropriateness for such development. In this context, such considerations include:

3.19.1 The Sites location to the south of North Hyde Road (A437), Station Road and the Dawley Road roundabout, all forming important primary thoroughfares;

3.19.2 The existing character of the Site and it including buildings of between 4-5 commercial storeys;

3.19.3 The Site lacking any discernible physical landmark features or townscape qualities, formed of a collection of commercial uses with an inefficient use of land and relatively poor visual amenity;

3.19.4 The lack of designated and non-designated heritage assets within and surrounding the Site;

3.19.5 The number of sensitive receptors in the immediate area being limited;

3.19.6 The existing uses not according with the overarching residential context found across the wider area;

3.19.7 The Site’s location relative to an emerging tall building context, including residential development (Keith House and Millington Road);

- 3.19.8 The Site’s location on the edge of the Haye’s Housing Zone and within the Hayes Opportunity Area, identified within the London Plan to deliver 9,000 new homes;
- 3.19.9 The Site’s location relative to Hayes and Hillingdon Railway Station, carrying a PTAL rating of 4; and
- 3.19.10 The existing uses being a general anomaly to the prevailing townscape, with a change of use to residential, tied to regenerative change, representing an opportunity for positive, transformative change.

WIDER DESIGN CONSIDERATIONS

- 3.20 Policy BE1 notes 11 key priorities which the Council will use to deliver new development, including the following which relate to heritage, townscape and visual considerations:

3.20.1 Conserve and enhance the borough’s heritage and their settings (SO1)

3.20.2 Create neighbourhoods that are of a high-quality sustainable design, that have regard for their historic context and use sustainability principles which are sensitive and responsive to the significance of the historic environment, are distinctive, safe and functional, and which reinforce the identity and suburban qualities of the borough’s streets and public places (SO2); and

3.20.3 Improve the quality of and accessibility to, the heritage value of the borough’s open spaces, including rivers and canals as areas for sports, recreation, visual interest biodiversity, education, health and wellbeing (SO3).

3.20.4 Policy BE1 requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods. All new developments are noted as needing to:

3.20.41 Achieve a high quality of design which enhances the local distinctiveness of the area, contributes to community cohesion and sense of place;

- 3.20.42 Be designed to be appropriate to the identity and context of Hillingdon’s buildings, townscape, landscapes and views, and make positive contribution to the local area in terms of layout, form and scale and materials, and seek to protect amenity of surrounding land and buildings, particularly residential properties
- 3.20.43 Incorporate a clear network of routes that are easy to understand, inclusive, safe, secure and connect positively with interchanges, public transport, community facilities and services;
- 3.20.44 Improve the quality of public realm and provide for public and private spaces that are attractive, safe, functional, diverse, sustainable, accessible to all, respect local character and landscape, integrate with the development, enhance and protect biodiversity.

- 3.21 Supporting Strategic Policy BE1 is Policy DMHB 10: High Buildings, which requires any proposal for a high building to respond to the local context and satisfy the following heritage, townscape and visual criteria:

3.21.1 Be located in Uxbridge or Hayes town centres or an area identified by the Borough as appropriate for such buildings;

3.21.2 Be located in an area of high public transport accessibility and be fully accessible for all users;

3.21.3 Be of a height, form, massing and footprint proportionate to its location and sensitive to adjacent buildings and the wider townscape context. Consideration should be given to its integration with the local street network, its relationship with public and private open spaces and its impact on local views;

3.21.4 Achieve high architectural quality and include design innovation. Consideration should be given to its silhouette, so that it provides a positive contribution to the skyline, its design at street level, facing materials and finishes, lighting and night time impact; and

3.21.5 Where residential uses are proposed, include high quality and usable private and communal amenity space and ensure an innovative approach to the provision of open space.

- 3.22

Further to Policy DMHB 10, Policy DMHB 11: Design of New Development, requires all development to be designed to the highest standards and, incorporate principles of good design including harmonising with the local context by taking into account:

3.22.1

Scale (including height, mass and bulk of adjacent structures);

3.22.2

Plot sizes (including coverage and street patterns);

3.22.3

Building lines, set backs and streetscape rhythm;

3.22.4

Architectural composition and detailing;

3.22.5

Local topography and views; and

3.22.6

Impact on open spaces
- 3.23

Development is also required by Policy DMHB 11 to ensure the use of high-quality building materials and maximise sustainability and adaptability. They should also protect features of value, including safeguarding heritage assets (including designated and non-designated) and their settings.
- 3.24

Policy DMHB 12: Streets and Public Realm, seeks to ensure developments improve legibly and promote routes and wayfinding between development and local amenity, as well as ensuring public realm design takes account of the established townscape character and quality of the area.

HERITAGE

- 3.25

In relation to heritage considerations, Part 1 of the Local Plan notes as part of their Strategic Objective that the borough will look to conserve and enhance the borough’s heritage and their settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and seek to maintain and enhance the contribution of built, landscaped and buried heritage to London’s environmental quality, cultural identity and economy as part of managing London’s ability to accommodate change and regeneration.

- 3.26

Policy HE1: Heritage, supports the Borough’s Strategic Objective and notes that the Council will conserve and enhances the borough’s distinct and varied historic environment, its settings and the wider historic landscape, which includes:

3.26.1

Historic Village Cores, Metro-land suburbs, planned residential estates and 19th and 20th century industrial areas, including the Grand Union Canal and its features;

3.26.2

Designated Heritage Assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Monuments;

3.26.3

Registered Parks and Gardens and historic landscapes, both natural and designed;

3.26.4

Locally recognised historic features, such as Areas of Special Local Character and Locally Listed Buildings.

4.0 HISTORIC DEVELOPMENT

HYDE PARK, HAYES, UB3 4AZ

HISTORIC DEVELOPMENT

4.1 This section provides a description of the historical development of the Site and the surrounding area.

HAYES AND BOTWELL TOWN CENTRES

4.2 The area of Hayes Town has come to be applied to the area surrounding Hayes and Harlington Railway Station, including Station Road and Coldharbour Lane to the north. Historically and up to the 20th century, these areas were, in fact, part of the village of Botwell, forming a series and collection of separate, smaller village, that would spread and amalgamate through the late-19th century and into the 20th century.

4.3 The smaller settlement of Hayes Town was, during both the 19th and 20th centuries, situated further north at St Mary’s Church and Barra Hall (see **Figure 4.1**). The village included the Church, a Rectory, a Manor House, Post Office and Hayes Brewery. Remnants of the former Hayes settlement remain today, including historic cottages and terraced development at Church Road (close to Hemmen Lane), approximately 1.79km north of the Site.

4.4 To the south of Hayes, Botwell comprised a small linear settlement, to the north of the Great Western Railway, served by a small railway station (see **Figure 4.2**). Properties here largely comprised lodges, Manor Houses and agricultural buildings, likely associated with serving the surrounding land. The Grand Union Cana passed through the centre of the settlement, with Brick Fields located close to it to take advantage of its transportation of goods and material.



Figure 4.1 Extract from 1864–1865 Ordnance Survey Map (National Library of Scotland)



Figure 4.2 Extract from 1864–1865 Ordnance Survey Map (National Library of Scotland)

AGRICULTURE TO INDUSTRY

4.5 By 1913, the land to the north of the Great Western Railway line saw dramatic change and urbanisation. Changes were largely spurred by a shift from agricultural practices to industry, support by the location of the railway, as well as other Victorian transport infrastructure – the Grand Union Canal. The construction of a larger railway station in 1868 also contributed to the ability for increased industry and population growth.

4.6 The area around the railway quickly became a centre for engineering and industry, with the Hayes Development Company making sites available to the north of the railway line, close to both the station and canal further north. Early factories here included the British Electric Transformer Company (1901), the Aeolian Pianola Factory (c. 1910), situated to the north east of the station, as well the Gramophone Company/ EMI, located on Blythe Road and to the north of the Site.

4.7 Amongst industry, residential terraced properties quickly developed, housing the workers and their families serving newly established commercial and industrial establishments. The first included properties along Clayton Road and Blythe Road (to the north of the railway line), with 12 properties at Ketih Road constructed by 1913 (see **Figure 4.3**). The Site remained void of development at this time, located to the south of North Hyde Road.



Figure 4.3 Extract from 1913 Ordnance Survey Map (National Library of Scotland)



Figure 4.4 1930s Aerial Photography showing the Fairey Aviation Company's Site at North Hyde Road, residential development at Keith Road, the Great Western Railway and the Gramophone Company buildings to the north (Britain from Above)

THE FAIREY AVIATION COMPANY

- 4.8 Founded in 1915, the Fairey Aviation Company opened works to the south of the Great Western Railway line, with aircraft production primarily focussed at their factory to the south of North Hyde Road, at the location of the current Hyde Park Business Park.
- 4.9 The manufacturing factory began life as five wooden sheds, though by 1928, covered 19 acres and employed a workforce of 1,500. Notable aircraft produced at the company's Hayes facility included the Swordfish, the Fairey Rotodyne and the Westland Wasp and Scout.
- 4.10 To the north of the Site, in the 1930s, was Mercury House, the headquarters/ office building for the Fairey Company. Constructed in 1926 and in a Modern, Art Deco style, the building was the main office block for the Site. In 1940, King George VI and Queen Elizabeth visited the factory and were likely entertained at Mercury House.



Figure 4.5 1932 Aerial Photography, with Mercury House to the north of the Site and fronting North Hyde Road (Britain from Above)



Figure 4.6 Extract from 1935 Ordnance Survey Map (National Library of Scotland)

- 4.11 By 1964, the Fairey Aviation works had expanded west, whilst North Hyde Road was diverted towards its western end at the junction of Dawley Road, likely associated with the increase in traffic from wider population expansion in the area.
- 4.12 The Fairey Aviation Company continued to work out of Hayes until the 1960s/ 70s, following a merger with Westland Aircraft and a period of financial decline followed during the 1970s and 1980s.
- 4.13 The Fairey Aviation/ Westland Factory was sold in 1972, with only the northern office building, Mercury House, retained. It was taken over and purchased by Safeway Stores (formerly Argyll Foods), with the area becoming known as the Westland Trading Estate in 1986. The company used Mercury House as an office building, though following the company's relocation to Bradford in 2004, the building stood empty and was consequently demolished in 2007 (with the site of the property now occupied by Premier Inn).
- 4.14 As found today, the majority of, if not all, historic association with the aviation industry has been removed, and the Site and wider area now forms part of the Millington Road Industrial Estate, which straddles the north and southern sides of the railway.



Figure 4.7 Extract from 1964 Ordnance Survey Map (National Library of Scotland)

5.0 HERITAGE BASELINE

HYDE PARK, HAYES, UB3 4AZ

HERITAGE BASELINE

HERITAGE CONTEXT

- 5.1
- The Site comprises two commercial buildings and an existing multi-storey carpark. It is not located within a conservation area, nor does it contain any designated or non-designated heritage assets.
- 5.2
- Within a 500m radius of the Site is the Botwell, Thorn EMI Conservation Area, located to the north of the Site beyond the Great Western Railway Line. The conservation area includes the Grade II listed Enterprise House, as well as the Locally Listed Buildings of Apollo House, Neptune House, the Former HMV Offices/ Jupiter House, the Thorn/ EMI Building, and the HMV/ EMI Building.
- 5.3
- Between 500m and 1km from the Site are several Grade II listed buildings, including the Church of St Anselm, Botwell House, Benlow Work, and the Botwell, Nestles Conservation Area. To the south, on the boundary of the 1km Study Area is the Harlington Village Conservation Area, inclusive of the Grade I listed Church of St Peter and associated structures (including a Grade II listed wall and Monument to William and Elizabeth Brookes). The Registered Park and Garden of Stockley Park (Grade II) to located to the north-west, close to the boundary of the 1km study area.
- 5.4
- The NPPF defines heritage setting as the ‘surroundings in which a heritage asset is experienced.’ This broad scope means than many development proposals may be held to come within the setting of a heritage asset; however, most would agree that aside from some generic inter-visibility, a great number of such proposals could not reasonably be held to engage with or alter the setting of heritage assets in a material way.

- 5.5
- Owing to scope and nature of the Proposed Development, the prevailing height of other buildings in the surrounding area, and the screening provided by the existing building forms (as demonstrated through the ZTV included at **Figure 5.2**), the effect on the setting of several built heritage assets will be restricted and many will experience no setting effects at all.
- 5.6
- For the purposes of this HTVIA, therefore, professional judgement has been used to select those built heritage assets that are likely to experience change to their setting, and by extension, their significance. Those heritage assets that are both physically and functionally separated from the Site have not been assessed as the heritage significance of these assets is unlikely to be affected. Those assets are identified in **Table 5.1**.
- 5.7
- Hillingdon’s Local List identifies buildings of local architectural an historic importance across the borough. The List includes those buildings identified within the Botwell, Thorn EMI Conservation Area that hold sufficient local interest to constitute consideration in planning decision and be identified as non-designated heritage assets.
- 5.8
- The List also includes the Hayes and Harlington Station (ref. 095), noting the building as a 19th century station building, opening in 1868 and altered in circa. 1920.
- 5.9
- Included on the Local List for its landmark status and association with the development of the Great Western Railway (as well as its architectural interest being demonstrative of railway architecture of the mid-late-19th century), the former Hayes and Harlington Station has since been demolished to make way for a new Station building, constructed between 2016 and 2021, enabling step-free access and upgrades associated with Crossrail. We do not include an assessment of the Hayes and Harlington Station within this report, given it no longer exists.

MAP REF.	HERITAGE ASSET	GRADE
Listed Buildings		
1	Church of St Peter and St Paul	I
3	Church of St Anselm, Hayes	II
4	Botwell House	II
5	Benlow Works	II
6	Walls to North of Church of Saint Peter and Saint Paul	II
7	Monument to William and Elizabeth Brookes in Churchyard of St Peter and St Paul	II
Conservation Areas		
B	Botwell, Nestle	N/A
C	Harlington Village	N/A
Registered Park and Gardens		
14	Stockley Park: Business Park Phases I and II, and Country Park and Golf Course	II
Non-Designated Heritage Asset		
13	Hayes and Harlington Station, Station Road, Hayes	N/A

Table 5.1Scoped out Heritage Assets

- 5.10
- Those Heritage Assets ‘scoped in’ to the HTVIA assessment are therefore as follows.

MAP REF.	HERITAGE ASSET	GRADE
Listed Buildings		
2	Enterprise House	II
Conservation Areas		
A	Botwell, Thorn EMI	N/A
Locally Listed Buildings		
8	Thorn/EMI Building, Hayes (Botwell), Blyth Road, Hayes	N/A
9	HMV/EMI Building, Hayes (Botwell), Blyth Road, Hayes	N/A
10	Apollo House, 120 Blyth Road, Hayes	N/A
11	Neptune House, Blyth Road, Hayes	N/A
12	Former HMV/ offices/ Jupiter House, Blyth Road, Hayes	N/A

Table 5.2Scoped in Heritage Assets

- 5.11
- We provide summary statements of significance for the assets scoped into the assessment below.



HERITAGE ASSET PLAN

Application Site (indicative)

Conservation Areas

- A. Botwell, Thorn EMI CA
- B. Botwell, Nestles CA
- C. Harlington Village CA

Listed Buildings

Grade I

1. Church of St Peter and St Paul

Grade II

2. Enterprise House
3. Church of St Anselm, Hayes
4. Botwell House
5. Benlow Works
6. Walls to North of Church of Saint Peter and Saint Paul
7. Monument to William and Elizabeth Brookes in Churchyard of Church of St Peter and St Paul

Locally Listed Buildings

8. Thorn/EMI Building, Hayes (Botwell), Blyth Road, Hayes
9. HMV/EMI Building, Hayes (Botwell), Blyth Road, Hayes
10. Apollo House, 120 Blyth Road, Hayes
11. Neptune House, Blyth Road, Hayes
12. Former HMV offices/ Jupiter House, Blyth Road, Hayes
13. Hayes and Harlington Station, Station Road, Hayes

Registered Park and Gardens

14. Stockley Park: Business park
Phases I and II, and country park
and golf course (Grade II)

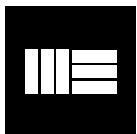
LOCATION:
Hyde Park, Hayes

DATE:
July 2025

SCALE:
1:10,000 @ A3

FIGURE 5.1 Heritage Asset Plan

▲ NORTH



MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
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WWW.MONTAGU-EVANS.CO.UK



HERITAGE ASSET PLAN ZTV OVERLAY

Application Site (indicative)

Conservation Areas

- A. Botwell, Thorn EMI CA
- B. Botwell, Nestles CA
- C. Harlington Village CA

Listed Buildings

Grade I

- 1. Church of St Peter and St Paul

Grade II

- 2. Enterprise House
- 3. Church of St Anselm, Hayes
- 4. Botwell House
- 5. Benlow Works
- 6. Walls to North of Church of Saint Peter and Saint Paul
- 7. Monument to William and Elizabeth Brookes in Churchyard of Church of St Peter and St Paul

Locally Listed Buildings

- 8. Thorn/EMI Building, Hayes (Botwell), Blyth Road, Hayes
- 9. HMV/EMI Building, Hayes (Botwell), Blyth Road, Hayes
- 10. Apollo House, 120 Blyth Road, Hayes
- 11. Neptune House, Blyth Road, Hayes
- 12. Former HMV offices/ Jupiter House, Blyth Road, Hayes
- 13. Hayes and Harlington Station, Station Road, Hayes

Registered Park and Gardens

- 14. Stockley Park: Business park Phases I and II, and country park and golf course (Grade II)

LOCATION:
Hyde Park, Hayes

DATE:
July 2025

SCALE:
1:10,000 @ A3

FIGURE 5.2 Heritage Asset Plan Overlaid
with ZTV

▲ NORTH



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LISTED BUILDINGS

ENTERPRISE HOUSE (GRADE II)

- 5.12

Enterprise House was added to the National Heritage List for England ('NHLE') at Grade II on 31st October 1997. It is located approximately 275m to the north of the Site, on the northern side of Blyth Road.
- 5.13

The significance of Enterprise House can largely be defined through its historical association with the Gramophone and Typewriter Ltd company, then and still known as His Master's Voice ('HMV').
- 5.14

Constructed in 1912 by the Trussed Concrete Steel Company and by E Owen Williams as senior designer, the building stands as part of a group of early-20th century commercial and industrial buildings that once formed the wider factory site for the production of records and vinyl. It has historic interest for its place in music production history, being demonstrative of the technical improvements of the early-20th century (moving away from gramophones to a more digital age).
- 5.15

Architecturally and structurally, the building is innovative of the period, comprised of a reinforced concrete frame, with posts and beams using the Kahn system of reinforcement patented in 1903 by Albert and Julius Kahn of Detroit, with painted brick infills. Its association with and being the first known work of E Owen Williams, one of the most significant engineers turned architects of the early-20th century and noted for his work for Boots Pure Drug Company, the Daily Express and British Overseas Airways Corporation, adds to the building's historic interest.
- 5.16

Williams' design intent was to celebrate the frame, construction method and innovative engineering building technique, expressing the frame clearly through as a complete composition, rather than setting the frame behind and brick or rendered façade, while also expressing the water tank to the building's otherwise flat roof form.
- 5.17

Enterprise House is currently on the Heritage at Risk Register (the 'At Risk' Register), noted as being in Poor Condition, with a 'repair scheme in progress and end use or identified'. In 2014, Hillingdon's Planning Committee voted in favour of granting planning permission and listed building consent for the building's refurbishment and conversion to a residential-led, mixed use scheme, securing commercial uses at ground and first floor levels, with extensions at roof level, the construction of
- external bridge links to the rear elevation and associated internal works, creating 96 residential units (ref. 11623/APP/2013/3606).
- 5.18

It is understood that the implementation of the 2013 refurbishment scheme is currently in progress, though the building remains on the 'At Risk' Register.
- CONTRIBUTION OF SETTING TO SIGNIFICANCE
- 5.19

Constructed in the early 20th century, the setting of Enterprise House has seen a great deal of change. As originally constructed, the building was situated amongst an array of industrial and commercial buildings, to the north of the Great Western Railway and associated with the manufacturing of vinyl records for His Masters Voice. As shown in historic mapping at **Section 4.0** (see **Figure 4.3**), upon construction, the immediate setting context included a single-storeyed Gramophone Factory (see also **Figure 4.4**), situated between Blyth Road and the railway line, alongside a Printing Works and other large footprint buildings. To the east and immediate north were smaller-scale residential properties, likely housing workers in the newly founded commercial and industrial area of Hayes. The 1935 Ordnance Survey Map at **Figure 4.6 (Section 4.0)** illustrates this commercial enterprise setting at its peak, which together with aerial photography from the period (see **Figure 4.4**), illustrate the historic setting of the listed building.

5.20

Today, the 20th century commercial and industrial setting context is much changed and rather, the listed building is experienced within an emerging residential townscape, set amongst historic vinyl and commercial development. The presence of 20th century commercial and manufacturing buildings alludes to the asset's historic townscape context, with that context defined by the boundaries of the Botwell, Thorn EMI Conservation Area, and including such buildings such as the Old Vinyl Factory, the Thorn/ EMI Building, Apollo House and Neptune House.

5.21

While the presence of the Old Vinyl Factory, Apollo and Neptune House, along with other former commercial buildings, allude to a historic setting context of both manufacturing and commercial uses, the presence of existing and ongoing change in the form of residential, office and mixed use develop alter one's experience to one of a modern townscape context with a focus on regeneration, interspersed with historic 20th century large format development.

5.22

The Site forms part of a wider townscape context beyond the Great Western Railway, to the south. It is formed of modern office development and car parking and makes no contribution to an understanding of the significance of Enterprise House. As such, it makes no contribution to its significance.

HERITAGE, TOWNSCAPE AND VISUAL IMPACT ASSESSMENT | JULY 2025



Figure 5.3 Image illustrating the setting context of the Grade II listed Enterprise House (Grade II)

CONSERVATION AREAS

BOTWELL, THORN EMI

- 5.23 The Botwell, Thorn EMI Conservation Area was designated in June 1988. There is no adopted Conservation Area Appraisal for the area, with its boundaries tightly defined along Blyth Road and south to the Great Western Railway, capturing buildings/ development associated with Gramophone and Typewriter Ltd company and later, EMI.
- 5.24 The conservation area captures a collection of buildings which historically formed the 20th century EMI manufacturing plant and head office. Collectively, these buildings capture a 20th century townscape context of commerce and industry and are largely characterised by buildings of larger footprints and a coarse urban grain.
- 5.25 The former Head Office building (Jupiter House) to the western boundary of the conservation area along Trevor Road is of a more traditional, classical appearance and proportion, being of three storeys with pedimented roof forms and quoins. It is constructed from red brick with setback diagonal basket weave brickwork panels between windows at ground and first floor levels, with the western frontage of 23-bays comprising a central entrance bay capped with an open pediment and mouldings above the entrance of an electricity bolt embossed with the letters 'EMI'.
- 5.26 Neighbouring the former Head Office building to the east is the Grade II listed Enterprise House, which is of a more monumental scale and proportion, spanning over six storeys and covering a length of approximately 110m. The proportions and scale of the building evoke a commercial character, with large Crittal-style windows and wider bays illustrative of its former commercial and manufacturing use.
- 5.27 The former Powerhouse building is situated to the immediate south of Enterprise House, on the southern side of Blyth Road, though the area surrounding the building is characterised by modern residential development associated with the regeneration of the area and a changing character from commercial, manufacturing and industry, to residential.
- 5.28 The south-western portion of the conservation area includes a small collection of historic 20th century buildings of a large scale and footprint, synonymous with the character of the area seen historically. This includes

both the Thorn/EMI Building and the HMV/EMI Building, the latter retaining its large, lettered signage to the western parapet, alluding to the building's former use and association with EMI.

- 5.29 In summary, the character and appearance of the conservation area is one of regenerative change, with a juxtaposition between modern

residential and commercial development with 20th century architecture associated with the music industry. Any contribution to the character and appearance is largely derived from the presence of historic buildings, demonstrative of the area's historic uses, rather than a single townscape quality or designed urban form.



Figure 5.4 Jupiter House, Botwell, Thorn EMI Conservation Area



Figure 5.5 Image of Crittall-style windows of Enterprise House, alluding to a commercial character, Botwell, Thorn EMI Conservation Area



Figure 5.6 Former Powerhouse Building, Botwell, Thorn EMI Conservation Area



Figure 5.7 Juxtaposition between historic development and modern regenerative change, Botwell, Thorn EMI Conservation Area

CONTRIBUTION OF SETTING TO SIGNIFICANCE

- 5.30 The Botwell, Thorn Conservation Area is located between Dawley Road to the west and the Alpha Estate to the east. Its tightly drawn boundaries illustrate the extent of survival of commercial development associated with the former EMI manufacturing factory. The surrounding locality and setting context are mixed and comprised of a varied character from low-scale residential, industrial development and emerging residential, mixed-use regeneration.
- 5.31 The setting of the conservation area is considered to make little contribution to its significance, though the presence of smaller-scale residential development from the turn of the 20th century to the immediate east does form part of a wider historic townscape setting context, comprising former workers accommodation buildings, likely for those working in the neighbouring manufacturing buildings.
- 5.32 The Site is located to the south of the Great Western Railway Line, detached from the immediate setting context and forming part of a varied setting of modern commercial development and swathes of lower-scale residential development forming the southern suburb of Hayes. The buildings across the Site are modern and far removed from the historic aircraft manufacturing seen on the Site during the 20th century. As such, the Site makes no contribution to the significance of the conservation area by virtue of setting.



Figure 5.8 Neighbouring residential properties – former workers cottages on Blythe Road

NON-DESIGNATED HERITAGE ASSETS

LOCALLY LISTED BUILDINGS WITHIN THE BOTWELL, THORN EMI CONSERVATION AREA

- 5.33 Owing to the high degree of group value between them, their shared setting context and association with the industrial and commercial character of the area historically, we have grouped together the locally listed buildings within the Botwell, Thorn EMI Conservation Area for the purposes of this assessment.
- 5.34 Below, we include a short description of the assets and any contribution made to its significance by virtue of its architectural and historic interest, before opining on the setting of all assets collectively.
- THORN/ EMI BUILDING, HAYES (BOTWELL), BLYTH ROAD, HAYES**
- 5.35 Constructed prior to the HMV/EMI building to its west and likely built between the period of expansion by the company between 1927–29 and to the designs of Wallis, Gilbert and Partners, the significance of the Thorn/ EMI Building largely lies in its historic association with the development of the Gramophone and Typewriter Ltd company, His Master's Voice ('HMV') and EMI, an industry which dominated the area locally in the early–20th century and which presence is still felt today through regeneration.
- 5.36 The building's industrial and commercial character, expressed through its monumental scale, long elevations and horizontal emphasis is synonymous with 1920s/ 30s commercial architecture, while its proportions and orientation appear to be defined by the presence of the railway line to its immediate south. Its location relative to the railway is also illustrative of the importance of the EMI site historically, forming a landmark feature within the local area.



Figure 5.9 Thorn / EMI Building, Hayes

HMV/ EMI BUILDING, HAYES (BOTWELL), BLYTH ROAD, HAYES

- 5.37 Constructed in approx. 1930s (see aerial photography from 1930 at **Figure 4.4** – which shows the Thorn / EMI Building under construction), the significance of the locally listed building derives from its historic association with the wider EMI/ HMV complex, an area defined by the boundaries of the conservation area.
- 5.38 Architecturally, the building is a good example of an inter-war factory building, designed by Wallis Gilbert and of a monumental scale, spanning across five storeys and with a horizontal emphasis, achieved through fenestration/ window positioning. The industrial/ commercial character of the building is synonymous with the overarching character of the area, and is suggestive of the historic townscape and origins of development locally, spurred on by industry and commerce and the interest of EMI.



Figure 5.10 HMV / EMI Building, Hayes

APOLLO HOUSE, 120 BLYTH ROAD, HAYES

- 5.39 Located to the east of the Botwell, Thorn Conservation Area and to the south of Blyth Road, Apollo House differs from the larger footprint, commercial and industrial characteristics of both the Thorn/ EMI and HMV/ EMI buildings, in that the building is more synonymous with a late-19th/ early-20th century industrial building. Constructed from yellow buff brick, with brick piers and extensive glazing, the building's significance can largely be derived from its association with the commercial character of the area historically and throughout the course of the early-mid-20th century, and for its group value with those buildings which form part of the former EMI complex (defined by the boundaries of the conservation area).

NEPTUNE HOUSE, BLYTH ROAD, HAYES

- 5.40 Neptune House stands as the first factory building in the EMI complex, dating from 1889. The building is currently undergoing alteration and refurbishment, though retains its industrial form, including its tall chimney and water tower.
- 5.41 The building draws much of its significance from being illustrative of the industrial and commercial development of the area from the late-19th century and turn of the 20th century, as well as its group value with the wider Thorn/ EMI complex, defined by the boundaries of the conservation area.



Figure 5.11 Apollo House, Hayes

FORMER HMV/ OFFICES/ JUPITER HOUSE, BLYTH ROAD, HAYES

- 5.42
- Situated along to the north of Blythe Road and on the western boundary of the conservation area, Jupiter House stands as the former Head Office building for EMI, with its front of 23-bays facing onto Trevor Road.
- 5.43
- The building is of a more traditional, classical appearance and proportion when compared to the neighbouring commercial buildings of Enterprise House and the EMI buildings, being of a smaller three storeys in scale with pedimented roof forms and quoins
- 5.44
- Constructed from red brick with setback diagonal basket weave brickwork panels between windows at ground and first floor levels, the building exhibits an accentuated central bay, capped with an open pediment and mouldings above the entrance of an electricity bolt embossed with the letters 'EMI'.
- 5.45
- The building's significance can be summarised as deriving from its association with the development of the EMI complex in the early-20th century, standing as a landmark feature on the western periphery of the EMI site and for its being of a style and form fitting of an HQ building with in-house recording facilities.

CONTRIBUTION OF SETTING TO SIGNIFICANCE

- 5.46
- The late-19th and early-20th century buildings which form part of the Botwell, Thorn EMI Conservation Area share a setting context which contributes to an understanding of their historic uses and association with the Gramophone and Typewriter Ltd company, His Master's Voice and EMI.
- 5.47
- The groups' location relative to the Great Western Railway illustrates the importance of the vinyl and gramophone industry at the turn of the 20th century, and the importance of industry and commerce to Hayes more generally at this period. Buildings of a larger footprint, including the former Thorn /EMI Building and the HMV/ EMI Building are of a monumental scale and character, demonstrative of the scale and requirements of the industry during the 1930s, while the more traditionally styled and proportioned Jupiter House is illustrative of the building's historic and more client facing function (that being a Head Office and Recording Studio).



Figure 5.12 Image of the EMI moulded signage to entrance on Trevor Road – Jupiter House

- 5.48
- The shared immediate setting context of the group of EMI buildings contributes to their significance and reinforces the high degree of group value between them. Beyond that immediate setting, the townscape is comprised of a mix of industry, commercial and residential development, including emerging residential-led mixed use regeneration. Any contribution made to significance from that wider setting context is minimal, and the group derive much of their interest by virtue of setting from their immediate and interrelated group value.
- 5.49
- The Site is located to the south of the group, beyond the Great Western Railway Line. It comprises modern office and commercial development that is far removed from the historic aviation uses and industrial character seen across the Site during the 20th century (see **Section 4.0**). The Site, therefore, shares no historic association with the EMI buildings and is now seen as modern office development neighbouring commercial units and car parking hardstanding. It is not considered to contribute to an understanding of the historical evolution nor architectural or historic interest of the locally listed buildings within the Botwell, Thorn EMI Conservation Area, and makes no contribution by virtue of setting.

SECTION SUMMARY

- 5.50
- The assessment identifies two designated heritage assets and several non-designated heritage assets (locally listed buildings) that have the potential to be affected by the Proposed Development, owing to a change in their setting.
- 5.51
- Heritage assets most likely to experience the greatest change to setting stemming from the Proposed Development and therefore key considerations include the Botwell, Thorn EMI Conservation Area, Enterprise House and associated buildings include Apollo House, the Former HMV Offices/ Jupiter House and the Thorn/ EMI Building.
- 5.52
- In relation to all heritage assets identified within the surrounding area, the Site, in its current form, makes no contribution to their significance by virtue of setting. It forms an area of modern commercial office and carparking development, removed and separated from the EMI complex by the Great Western Railway line. It is experienced as part of a mixed urban townscape on the periphery of Hayes town centre, including uses such as retail, residential and light industrial and buildings of varying scales and forms.
- 5.53
- This wider setting context of those heritage assets noted here makes no contribution to their significance, with any contribution to significance by virtue of setting focussed primarily to their immediate and shared setting, the extent of which is captured through the boundaries of the Botwell, Thorn EMI Conservation Area.

6.0 TOWNSCAPE BASELINE

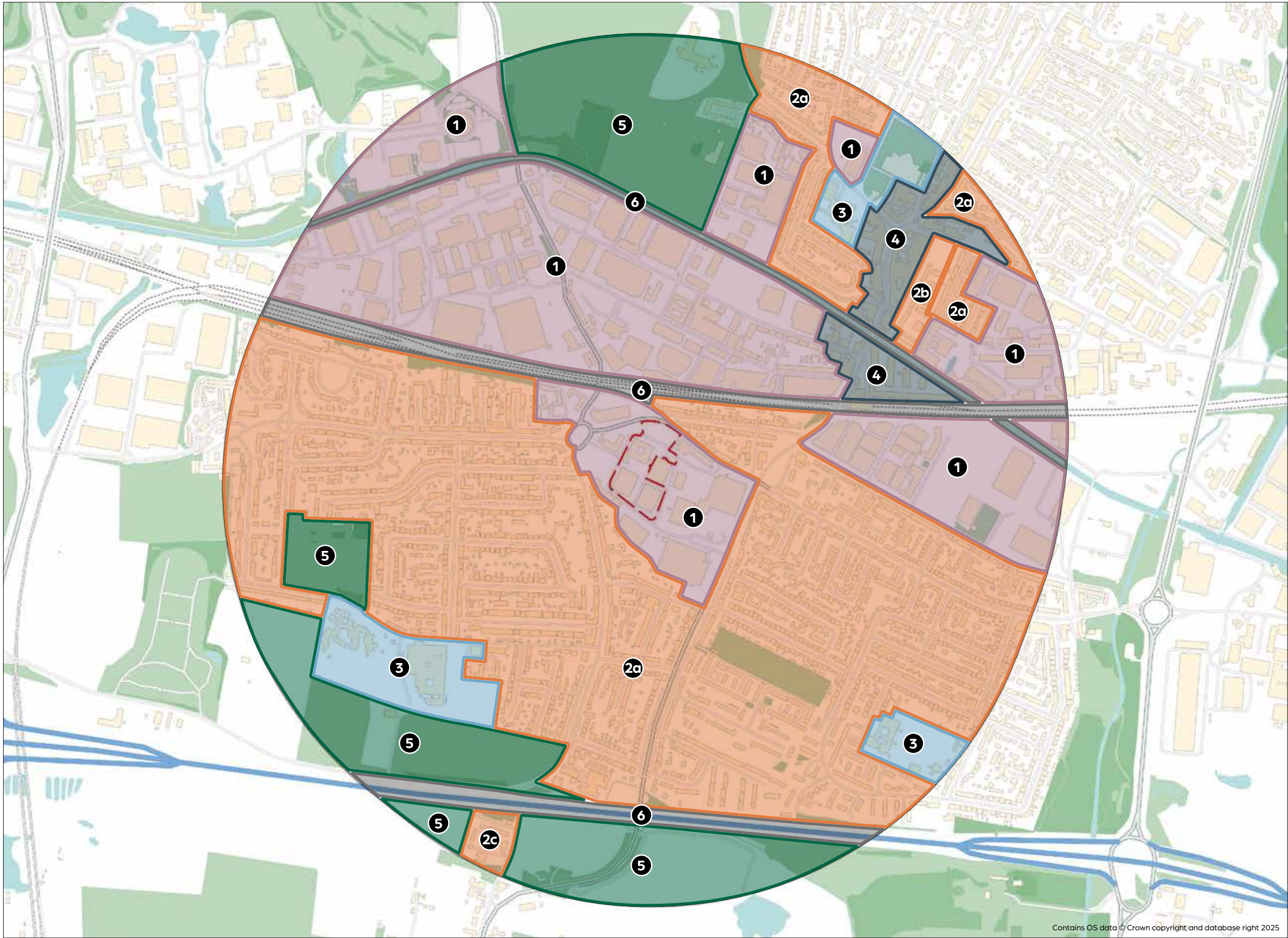
HYDE PARK, HAYES, UB3 4AZ

TOWNSCAPE BASELINE

TOWNSCAPE CHARACTER AREAS

- 6.1
- The townscape surrounding the Site may be categorised into 6 areas. For this assessment the character areas are referred to as:
- TCA 1: Industrial/ Commercial, with emerging Residential
 - TCA 2: Residential
 - TCA2a: Terraces, Metroland, Plotland, Garden City Estates
 - TCA2b: Apartments
 - TCA2c: Cul-de-Sac
 - TCA 3: Campus/ School/ Public Use
 - TCA 4: Hayes Town Centre
 - TCA 5: Open Space
 - TCA 6: Travel Infrastructure
- 6.2
- The broad boundaries of the character areas are identified in **Figure 6.1**. The townscape characteristics of the identified areas is discussed below.
- 6.3
- Owing to the existing townscape characteristics, distance, intervening development, high levels of vegetation and the nature and scale of the Proposed Development, it is not considered that the redevelopment of the Site at the parameters and uses proposed as part this application would have any potential to affect the core townscape characteristics of TCA 3 (Campus/ School/ Public Uses), TCA 5 (Open Space) and TCA 6 (Travel Infrastructure). Equally, the Proposed Development would not affect the characteristics of sub-categories of TCA 2, namely TCA 2b (Apartments) and TCA 2c (Cul-de-Sac). The baseline assessment of TCA 2 will therefore focus primarily on TCA 2a (Terraces, Metro-Land, Plotland and Garden City Estates).

- 6.4
- Whilst the proposed ZTV at **Appendix 1.0** and **Figure 2.1** may illustrate visibility from the wider area, VuCity ZTV data / analysis does not account for the occlusion of built form through vegetation and tree coverage/ foliage. It also picks up and reflects visibility of development through glimpsed, incidental views along linear streets. Following further analysis and interpretation of the ZTV data and visual testing, we consider that such visibility will not change the primary facets which contribute to the townscape characteristics of TCA 2 (b and c), TCA 3, TCA 5 and TCA 6. These areas have therefore been scoped out from further assessment.
- 6.5
- We provide a summary assessment of the scoped in townscape character areas below.



TOWNSCAPE CHARACTER AREA PLAN

- Application Site (indicative)
1. TCA 1: Industrial / Commercial, with Emerging Residential
 - 2a. TCA 2a: Residential (Terraces, Metro-Land, Plotland, Garden City Estates)
 - 2b. TCA 2b: Residential (Apartments)
 - 2c. TCA 2c: Residential (Cul-de-Sac)
 3. TCA 3: Campus / School / Public Uses
 4. TCA4: Hayes Town Centre
 5. TCA 5: Open Space
 6. TCA 6: Travel Infrastructure

LOCATION:
Hyde Park, Hayes

DATE:
July 2025

SCALE:
1:10,000 @ A3

FIGURE 6.1 Townscape Character Area Plan

▲ NORTH



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TCA 1: INDUSTRIAL/ COMMERCIAL, WITH EMERGING RESIDENTIAL

- 6.6 TCA 1 is defined by land and uses close to the railway line, with origins routed in industry and the establishment of the Gramophone and Typewriter Ltd company and EMI. It covers an area between the railway and the Grand Union Canal, illustrative of the importance of industry within the area, sandwiched between two key transportation routes.
- 6.7 The area extends south, beyond the railway line and includes the Site. While not industrial in use, the large footprint of buildings occupying and surrounding the Site, including neighbouring retail/ commercial units, follows the urban grain seen to the north of the railway, which differs greatly from the wider locality to the south and further north, which includes a finer grain and smaller scale, dominated by residential uses.
- 6.8 The area to the north of the railway is dominated by the former EMI complex, which includes buildings of a substantial and monumental scale, set amongst a formal street pattern of long thoroughfares (Blyth Road and Trevor Road). This area, while still including buildings of a large scale illustrative of the area's industrial and commercial past, also includes pockets of regenerative change. Such development includes Western Homes', 'The Venue', and Fizzy Living's BTR scheme at Powerhouse Lane.
- 6.9 To the south of the railway line and bound to the north-by-North Hyde Road is the Hyde Park campus. The area includes three office buildings, a hotel, residential and retail space, with buildings of similar scale and proportion to those seen to the north. Large areas are given over to carparking and there is little to tie developments together in terms of form, landscaping or interlinking thoroughfares, with the area dominated by unresolved elevations with little articulation or relief.
- 6.10 Landscape features such as tree planting along plot boundaries, green verges and hedgerows help soften the hard urban qualities of the area, though one remains aware of the large scale, large footprint buildings which dominate the area.
- 6.11 Building heights across the character area range from single/ two storey industrial sheds to 11-storey residential building. The varied character from industrial, commercial to a modern residential-led townscape creates a diverse and varied townscape.
- 6.12 Townscape Value: **Low-Medium**



Figure 6.2 Image showing larger format buildings across the Site



Figure 6.3 Image showing larger format buildings across the Site



Figure 6.4 Image showing collection of larger format office buildings within the Site



Figure 6.5 Image of Cavenham Court, TCA 1



Figure 6.6 Image of Fizzy Living's BTR scheme on Pressing Lane



Figure 6.7 Image of Asda Superstore and Premier Inn, Station Road and North Hyde Road – TCA 1



Figure 6.8 Landscape features – TCA 1

TCA 2A: RESIDENTIAL (TERRACES, METRO-LAND, PLOTLAND, GARDEN CITY ESTATES)

- 6.13 The townscape to the west, south and east of the Site can largely be characterised by swathes of smaller-scale, two-storey residential uses. This includes residential streets to the east and west of High Street/ Station Road, which cuts through the area from the M4, extending north towards Hayes and Hillingdon Railway Station. Whilst the area can be defined by its residential uses and consistency in scale and finer urban grain, it can be split into a number of sub-areas, with the character, architectural style and appearance of streetscapes and properties differs, illustrative of the changing demographic and needs of the area throughout the early-mid-20th centuries.

URBAN TERRACES

- 6.14 At the centre of the area, to the immediate south of TCA 1 is Bushey Road and Redmead Road. These form some of the earliest residential properties in the immediate locality and are illustrative of the initial development in the early-mid-20th century (circa. 1913/1914).
- 6.15 Properties here are largely characterised by their distinct architectural features, such as traditional proportions, sash windows (where windows have not been replaced with uPVC alternatives), gauged brick arches and gables with mock Tudor framing. They are set back from the street edge by smaller front garden areas, with on-street parking and generous plot widths and large gardens.
- 6.16 Buildings are predominantly two storeys in height, with a consistent treatment and building form. There is a mixture of terrace properties with the occasional break with narrow passages and closely spaced gables, giving the perception of a consistent and continuous terrace. Beyond the confines of this sub-area, one is aware of a more commercial and industrial townscape, visible in views north along Bushey Road (see **Figure 6.10**).



Figure 6.9 Image of Properties along Bushey Road



Figure 6.10 Image illustrating visibility of industrial/ commercial development along Bushey Road

METROLAND

- 6.17 Metroland stems from the classic inter-war suburban housing typology, first coined by the Metropolitan Railway company as part of their marketing campaign to promote an ideal lifestyle of living in the countryside with access to railway infrastructure and services to and from central London.
- 6.18 Within the Study Area, areas of this residential typology and period include areas to the east of Station Road, Hyde Way, Crowland Avenue, Monmouth Road, Cranford Drive and extending onto Coronation Road, Laburnum Road and Roseville Road. This area also includes a small run of semi-detached properties along Keith Road, to the north of the Site between North Hyde Road and the Great Western Railway line.
- 6.19 With development tied to the commerciality of the railways, much of the residential development within this area is privately built, constructed in the inter-war period. Housing display features influenced by a number of eras, with earlier properties illustrative of the gradual transition from Edwardian housing architecture, including a more horizontal emphasis and less verticality (Northfield Park), with wider plot widths and buildings set amongst a terraced block of four dwellings.
- 6.20 To the south of Northfield Close and along Monmouth Road and the surrounding locality, buildings tend to be detached or semi-detached, with hipped roof and more generous spacing between plots when compared to earlier terraced development of the turn of the 20th century at Bushey Road and Redmead Road. This gives a sense of openness and reflects the characteristics associated with suburbia. This character is furthered by buildings set back from the street edge, with front gardens now primarily used for off street carparking.
- 6.21 Architecturally, the more formal architectural styles of the turn of the century are replaced by a more relaxed and paired back style, with asymmetrical compositions and materials and details that evoke a rural, suburban character.
- 6.22 To the north, along Keith Road, the experience of the townscape is more of a town centre, urban fringe character, with an awareness of modern residential development, visible through gaps between buildings and along the linear street pattern.



Figure 6.11 Image illustrating the extent of visibility of modern regeneration within the context of Keith Road



Figure 6.12 Image illustrating the extent of visibility of modern regeneration within the context of Keith Road, along linear views eastwards

GARDEN CITY ESTATES

- 6.23 To the west of the Site, along Bourne Avenue (and its northern branches), Waltham Avenue, Glamis Crescent, Denbigh Drive and Snowdown Crescent, the residential form and typology shifts to a Garden City style, illustrative of the social demographic of the area during the inter-war period, with architecture and building forms distinctly different to those in across Metroland, being built for a more social basis, often by the public sector.
- 6.24 While consistent in terms of use and broadly continuing the finer urban grain seen across the character area, buildings here are grouped in terraces, with a holistic composition and a sense of symmetry. This consistency in appearance emphasises their collective identity and single period of construction by a single entity.
- 6.25 The style and character of buildings to the west of the Site evokes solidity, though embellishment is limited and facades are plain, with simple detailing and flat frontages in place of the more elaborate gables and frontages seen across in Metroland. Gardens are fairly generous, with distances between back of properties ranging from approx. 40–50m.
- 6.26 Buildings are generally of two storeys with either a square or wide plan form. Combined with the fact buildings tend to be grouped in short terraces, this results in a building form with a more horizontal emphasis than the traditional terraced development seen along Bushey Road and Redmead Road.

PLOTLAND

- 6.27 To the south-west of TCA 2 is an area defined as ‘Plotland’. This area shares architectural and townscape similarities with Metroland, and is residential in use, though buildings were constructed speculatively, with buildings differing plot by plot or road by road, dependent on whether buildings were constructed by a purchaser commissioning their own home, or by a speculative builder developing several properties. This results in a diverse and rather fragmented townscape.

SUMMARY

- 6.28 TCA 2a: Residential (Terraces, Metro-Land, Plotland, Garden City Estates) is a broad character area, dominated by small-scale, two-storey domestic development, associated with the rise in local population from the turn of the century. The varying characteristics, from the more traditional terraced development to the planned and more horizontal character of the Garden City style estates, illustrate a change in architectural tastes through the early-mid-20th century, though the area is tied together by its sprawling residential use, network of streets and not a clearly defined boundary between one style of the other.
- 6.29 Townscape Value: **Low – Medium**



Figure 6.13 Image of terraced properties along Bourne Avenue

TCA 4: HAYES TOWN CENTRE

- 6.30 Hayes Town Centre extends to the north from the bridge extending over the Great Western Railway line, along Station Road, capturing the commercial centre of the area.
- 6.31 The TCA can be characterised by its commercial ground floor frontages and diverse range of architectural styles, characters and forms, synonymous with a town centre location.
- 6.32 Station Road is a busy, populated thoroughfare with large volumes of public transport and car traffic, while there is also a high pedestrian footfall, particularly at rush hour, given the location of Hayes and Harlington Station.
- 6.33 Uses across the character area vary from commercial/ retail to residential, commensurate with a town centre location. Building scales range from 10/11 storeys to a finer, lower-scale, with those of a smaller scale largely routed in the area's late-19th and early-20th century townscape.
- 6.34 Architectural styles are equally varied, from the traditional ecclesiastical character of Saint Anselm Church to the modern form of the Hayes Methodist Church, with a variety of building forms, styles and scales lining either side of the High Street.
- 6.35 Views through and out of the area are limited to linear vistas along Station Road, where one is aware of the varied and eclectic mix of buildings and uses. From the south, at Hayes and Harlington Station, views south-east afford glimpsed visibility of the buildings currently occupying the Site, though such visibility offers no visual interest or point of townscape reference, with buildings appearing monolithic on the skyline.
- 6.36 Townscape Value: **Low – Medium**



Figure 6.14 Image illustrating range of building heights along Station Road

SECTION SUMMARY

6.37 Table 6.1 presents a summary of the townscape receptor baseline information.

REF.	TOWNSCAPE CHARACTER AREA	TOWNSCAPE VALUE	FULL ASSESSMENT REQUIRED?
1	TCA 1: Industrial/ Commercial, with Emerging Residential	Low-Medium	Yes
2a	TCA 2a: Residential (Terraces, Metro-Land, Plotland, Garden City Estates)	Low-Medium	Yes
2b	Residents of South Norwoodial (Apartments)	Low	No
2c	Residential (Cul-de-Sac)	Low-Medium	No
3	Campus/ School/ Public Uses	Medium	No
4	TCA 4: Hayes Town Centre	Low-Medium	Yes
5	Open Space	Medium-High	No
6	Travel Infrastructure	Low	No

Table 6.1 Summary of Townscape Baseline

7.0 VISUAL BASELINE

HYDE PARK, HAYES, UB3 4AZ

VISUAL BASELINE

7.1 This section provides an assessment of the visual baseline, including the way in which the Site is presently experienced by receptors. The assessment is undertaken in accordance with best practice guidance, including that set out in GLVIA3.

IDENTIFYING EXTENT OF VISIBILITY

7.2 A ZTV (see **Section 2.0 – Figure 2.1**) has been produced to identify areas and locations where the Proposed Development may be visible and experienced by receptors. The ZTV has been produced using topographically referenced three-dimensional models from VuCity software. It is a tool for a high-level understanding of the extent of visibility, which was further interrogated through review of individual viewpoints using field surveys and digital software.

7.3 The ZTV demonstrates that visibility of the Proposed Development (based on the maximum parameters) is largely reserved to linear views along North Hyde Road, Dawley Road, Bourne Avenue and Station Road. There is visibility across the wider area, though as demonstrated by the suite of verified views, such visibility is largely reserved to incidental, glimpsed views between existing development and as part of a transient viewing experience.



VIEWPOINT LOCATION PLAN

- Application Site (indicative)
- 1a. Harlington Bridge
- 1b. High Street
- 1c. Station Road
- 1d. Millington Road
- 2a. Hayes & Harlington Station
- 2b. Station Road
- 2c. Keith Road
- 2d. Keith Road
- 3a. Shepiston Lane
- 3b. Shepiston Lane
- 3c. Dawley Road
- 3d. Dawley Road/ Waltham Avenue
- 4a. Dawley Road at Grand Union Canal
- 4b. Dawley Road
- 4c. Dawley Road
- 4d. Dawley Road
- 5. Bourne Avenue
- 6. Waltham Avenue
- 7. North Hyde Road
- 8. Laburnum Road
- 9. Monmouth Road
- 10. Wentworth Crescent/ Clifford Gardens
- 11. North Hyde Road/ Station Road

LOCATION:
Hyde Park, Hayes

DATE:
July 2025

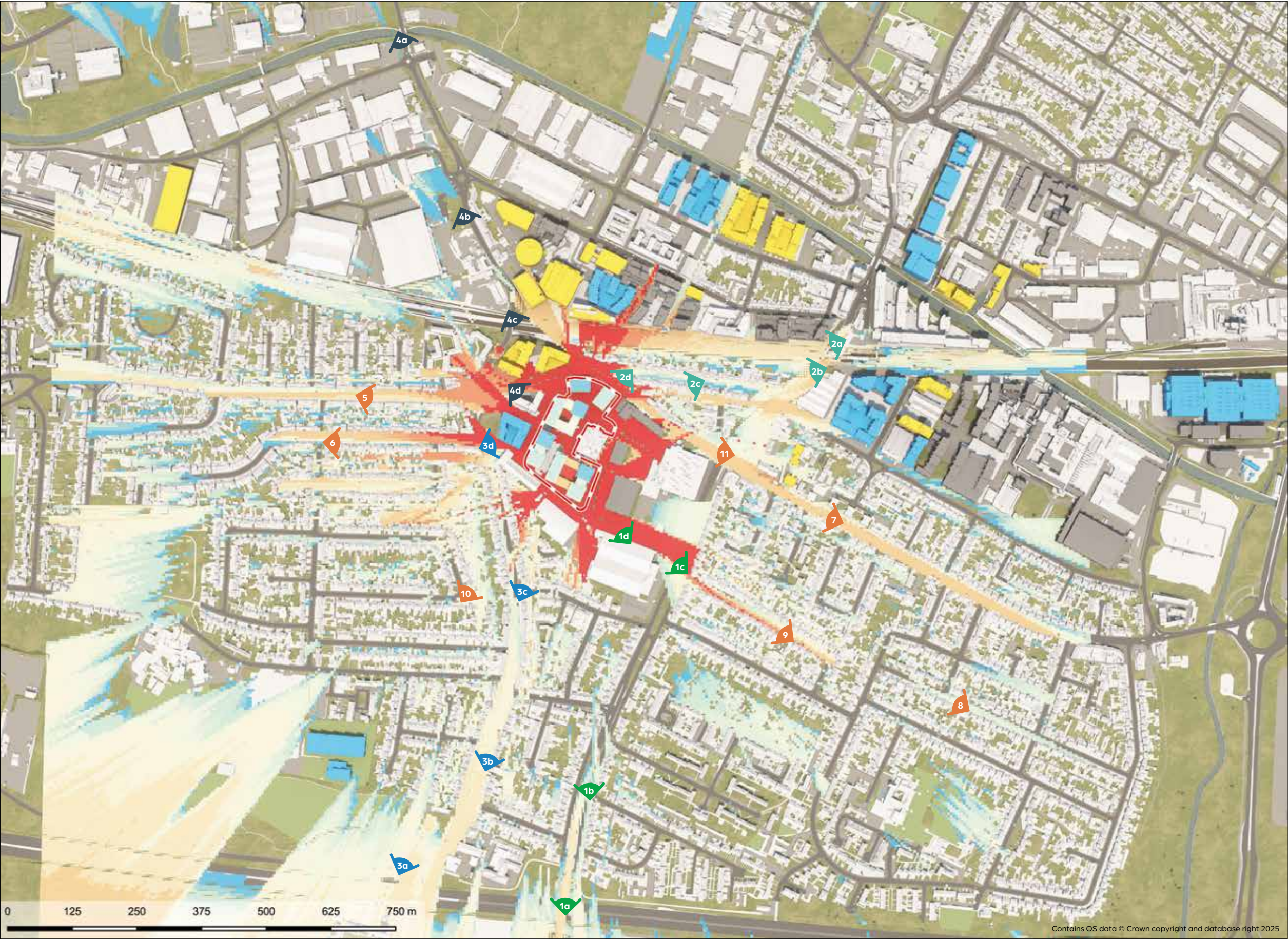
SCALE:
1:7,500 @ A3

FIGURE 7.1 View Location Plan

▲ NORTH



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**VIEWPOINT
LOCATION PLAN
ZTV OVERLAY**

- Application Site (indicative)
- 1a. Harlington Bridge
- 1b. High Street
- 1c. Station Road
- 1d. Millington Road
- 2a. Hayes & Harlington Station
- 2b. Station Road
- 2c. Keith Road
- 2d. Keith Road
- 3a. Shepiston Lane
- 3b. Shepiston Lane
- 3c. Dawley Road
- 3d. Dawley Road/ Waltham Avenue
- 4a. Dawley Road at Grand Union Canal
- 4b. Dawley Road
- 4c. Dawley Road
- 4d. Dawley Road
- 5. Bourne Avenue
- 6. Waltham Avenue
- 7. North Hyde Road
- 8. Laburnum Road
- 9. Monmouth Road
- 10. Wentworth Crescent/ Clifford Gardens
- 11. North Hyde Road/ Station Road

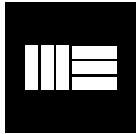
LOCATION:
Hyde Park, Hayes

DATE:
July 2025

SCALE:
1:7,500 @ A3

FIGURE 7.2 View Location Plan overlaid with ZTV

▲ NORTH



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IDENTIFICATION OF REPRESENTATIVE VIEWS

- 7.4 View locations have been selected based on potential visibility of the Proposed Development and through pre-application engagement with the LBH. These locations were further interrogated with consideration of surrounding heritage assets, townscape character and visual receptors.
- 7.5 A total of 23 AVRs were identified through the pre-application and design development process. The locations of views were determined by the ZTV analysis and experience of the Site within the surrounding townscape context. Baseline photography for each view can be found in **Appendix 3.0**, prepared by AVR.

VISUAL RECEPTORS

- 7.6 The text below identifies different receptor groups who may experience views of the Proposed Development, the places where they will be affected and the nature of the views and visual amenity at those points. The viewing positions may be representative of several different receptors and therefore the same position might be utilised for several receptors and will be assessed alongside how they use an area and appreciate its visual amenity.

RESIDENTS ACROSS HAYES' SOUTHERN SUBURBS

- 7.7 Views: 1b, 2c, 2d, 3b, 5, 6, 7, 8, 9, 10
- 7.8 The receptors within this group are residents primarily to the south of the Great Western Railway line, largely aligned with the boundaries of TCA 2a (see baseline townscape assessment at **Section 6.0** – and **Figure 6.1**).
- 7.9 Receptors across this broad area will largely be focussed on their daily business and/or activities, including travelling to and from Hayes town centre, located across the railway bridge to the north, travelling to and from Hayes and Harlington Station and their domestic residential context. They will spend much of their time within the immediate area, within and around their place of residence.
- 7.10 Those living close to the major vehicular thoroughfares of Station Road (the A437) and Shepiston Lane will be aware of the high levels of vehicular and pedestrian movement travelling both to and from Hayes town centre, including public transport. Longer distance views north will give rise to visibility of modern commercial development, as well as an emerging residential townscape, associated with the regeneration of the town centre (see View 1B (**Figure 7.3**) and 3B (**Figure 7.4**)).



Figure 7.3 Existing Viewpoint 1b: High Street



Figure 7.4 Existing Viewpoint 3b: Shepiston Lane

- 7.11

The experience of those residing in secondary and tertiary streets traversing off those principal routes (for example those along Monmouth Road, Hyde Way, Bourne Avenue, Waltham Avenue, Fairey Avenue and the street network surrounding Coronation Road) will differ to those residing closer to major arterial routes and close to neighbouring commercial and industrial uses (for example those residents along North Hyde Road, those to the immediate east of the existing Asda Superstore, or those residents residing in Keith Road to the north of the Site – situated to the immediate south of the Great Western Railway line with views north towards an emerging tall building context (see **Figure 7.5**). From such locations, the experience of receptors is more domestic and quieter than the busy character of Station Road and Shepiston Lane, with limited traffic levels and activity more associated with daily life. The high levels of on street parking reinforces the suburban residential context.
- 7.12

Notwithstanding, views east and west to the north of the area will highlight residents’ location relative to the town centre and associated commercial and larger-scale development, with visibility of new built form terminating vistas along Bourne Avenue (see **Figure 7.6**), as well as industrial style development from Monmouth Road (see **Figure 7.7**). While larger-scale development and differing uses are visible, these will be peripheral to the primary experience of the receptor group, which will be focussed on their immediate residential townscape context.
- 7.13

Visual Amenity Value: **Low-Medium**



Figure 7.5 Photograph illustrating extent of visibility of modern residential development to the north of North Hyde Road, beyond the Great Western Railway Line



Figure 7.7 Existing Viewpoint 9: Monmouth Road



Figure 7.6 Existing Viewpoint 5: Bourne Avenue

USERS OF VEHICULAR AND PEDESTRIAN ROUTES

- 7.14 Views: 1a, 1b, 1c, 2a, 2b, 3a, 3b, 3c, 3d, 4a, 4b, 4c, 4d
- 7.15 This receptor group captures users of the road network of primary and secondary routes across the study area. Receptors will primarily be focussed on travelling to and from their destinations, with their attention more toward traffic, movement and pedestrians. The experience of the receptor and their surrounding townscape context will vary as their move through the area, ranging from residential to commercial and industrial, to uses associated with the town centre context (the latter being discernible as receptors move to the north of the study area).
- 7.16 The Site will be peripheral to the receptor group, and will be seen beyond existing commercial uses located on the western side of Station Road (A437) (see **Figures 7.8 and 7.9**), or as part of a townscape of larger format buildings, associated with the office uses seen across the Site to the east of Dawley Road (see **Figure 7.10**).
- 7.17 Receptors travelling north along Shepiston Lane and Station Road will utilise key wayfinding tools to gain an understanding of place, including visibility of larger scale development, situated close to the town centre (see **Figure 7.11**). Visibility of larger scale development will be synonymous with their direction of travel to Hayes town centre and beyond.
- 7.18 Visual Amenity Value: **Low**



Figure 7.8 Existing Viewpoint 1c: Station Road



Figure 7.9 Existing Viewpoint 11: North Hyde Road/ Station Road



Figure 7.10 Existing Viewpoint 3d: Dawley Road/ Waltham Avenue



Figure 7.11 Existing Viewpoint 1a: Harlington Bridge

COMMUTERS/ USERS OF PUBLIC TRANSPORT

- 7.19 Views 2a, 2b
- 7.20 This receptor group captures those close and users of Hayes and Harlington Station, including commuters. The group is represented by two viewpoints, located on Station Road to the north-east of the Site.
- 7.21 The viewpoints represent the experience receptors exiting Hayes and Harlington Station, where attention will be towards wayfinding and travelling to a destination (possibly to a place of residence). In the existing scenario, receptors will be aware of their location within the town centre, with high levels of activity to the immediate north, towards Blyth Road and Clayton Street, though they will also be cognisant of the emerging residential-led regeneration on the northern edge of the Great Western Railway line (see **Figure 7.12**).
- 7.22 In views across the bridge to the south-west, the existing buildings on the Site are visible to the receptor group, marking the location of Hyde Park, Hayes Business Park (see **Figure 7.12**). These are seen in the context of a commercial use of Asda Superstore, visible in views along the road network south along Station Road (see **Figure 7.13**).
- 7.23 Visual Amenity Value: **Low**



Figure 7.12 Existing Viewpoint 2a: Hayes and Harlington Station



Figure 7.13 Existing Viewpoint 2b: Station Road

USERS OF COMMERCIAL / INDUSTRIAL CLOSE TO THE SITE

- 7.24 Views 1c, 1d, 4d, 11
- 7.25 This receptor group captures people engaged in activities close to the Site, including groups visiting commercial uses to the Site’s immediate east, or those to the immediate south. Their experience of the area is one of a modern townscape context, with an awareness the surrounding residential context beyond. The existing buildings across the Site are commensurate with the character of the area, through offer little townscape or visual benefit, forming buildings of large footprints with little façade articulation, low visual interest and no ground floor activation.
- 7.26 Receptors within this group are likely to be focussed on activities which draw them to the area, with built form peripheral to their primary experience of the area.
- 7.27 Visual Amenity Value: **Low**



Figure 7.14 Existing Viewpoint 1c: Station Road



Figure 7.15 Existing Viewpoint 1d: Millington Road

SECTION SUMMARY

7.28 The visual baseline is summarised at **Table 7.1**.

VIEW	LOCATION	REPRESENTATIVE VIEWS	VISUAL AMENITY VALUE
Visual Receptors			
1	Residents across Hayes' Southern Suburbs	2c: Keith Road 2d: Keith Road 5: Bourne Avenue 6: Waltham Avenue 7: North Hyde Road 8: Laburnum Road 9: Monmouth Road 10: Wentworth Crescent/ Clifford Gardens	Low – Medium
2	Users of Vehicular and Pedestrian Routes	1a: Harlington Bridge 1b: High Street 1c: Station Road 3a: Shepiston Lane 3b: Shepiston Lane 3c: Dawley Road 3d: Dawley Road/ Waltham Avenue 4a: Dawley Road at Grand Union Canal 4b: Dawley Road 4c: Dawley Road 4d: Dawley Road 11: North Hyde Road/ Station Road	Low
3	Commuters/ Users of Public Transport	2a: Hayes & Harlington Station 2b: Station Road	Low
4	Users of Commercial / Industrial Close to the Site	1c: Station Road 1d: Millington Road 4d: Dawley Road 11: North Hyde Road/ Station Road	Low

Table 7.1 Summary of Visual Baseline

8.0

ASSESSMENT: HERITAGE

HYDE PARK, HAYES, UB3 4AZ

ASSESSMENT: HERITAGE

- 8.1
- The following section assesses the effect of the Proposed Development on the identified heritage assets. It includes an assessment of potential impacts arising from the Proposed Development on those heritage assets identified in **Section 5.0** and in light of legislation and policy set out in **Section 3.0**.
- 8.2
- The Design and Access Statement, prepared by TP Bennett provides a comprehensive discussion on the design rationale supporting the Proposed Development and should be read alongside the assessment set out in this section, in conjunction with the Control Documents.
- 8.3
- Where relevant, heritage assets have been grouped together for the purposes of this assessment. Such groupings have been based on the significance assessments (including assessments of setting) in **Section 5.0**, as well as the potential effects arising as a result of the Proposed Development.

DESIGNATED HERITAGE ASSETS

LISTED BUILDINGS

ENTERPRISE HOUSE (GRADE II)

- 8.4
- Enterprise House is located approximately 275m to the north of the Site, separated by the Great Western Railway line. The building's significance is largely defined in its monumental proportions, being an example of an early -20th century industrial construction method formed of a reinforced concrete frame. Its external architectural character is derivative of its historic use, including large and regular Crittall-style windows and elongated rectangular proportions, enabling high levels of natural light to penetrate through onto the floorplates.
- 8.5
- The building is currently unoccupied, with a proposal to convert extend and refurbish it and create 96 new residential units part implemented. It is understood that the building remains on the 'At Risk' Register.

- 8.6
- The building gains much of its significance by virtue of setting through its location relative to other historic industrial/ manufacturing buildings associated with the Gramophone and Typewriter Ltd company, His Master's Voice and EMI. This includes the neighbouring Jupiter House (the former Head Office building for EMI) and the Powerhouse/ Neptune House, situated on the southern side of Blyth Road. The shared interrelationship between these buildings, as well as those situated more broadly across the Old Vinyl Factory Site, enables one to appreciate that this area of Hayes was once dominated by industry and the manufacturing of vinyl records.
- 8.7
- Today, such an experience is seen against a context of modern residential regeneration, as well as education uses (the Global Academy) and commercial office space.
- 8.8
- The Proposed Development will introduce new residential development within the wider setting context of the listed Enterprise House, beyond the immediate foreground where the building is best experienced. The ZTV at **Figure 2.1** illustrates that the maximum extent of visibility of the Proposed Development within the context of Enterprise House will be centred in views south along Powerhouse Lane. Where visible, the Proposed Development will be seen beyond a foreground of modern residential development and past the major travel infrastructure of the Great Western Railway line. The Proposed Development will introduce buildings ranging from 3 to 11-storeys, including architecture informed by the area's history, including the Art Deco and 20th century styles (see Design Code pages 60 and 61, as well as DC 4.13 and DC 4.17). It is considered that such an approach will route the development in the context of Hayes' industrial and manufacturing history and form a positive urban context to the wider setting of the listed building more broadly. It is envisioned that through the implementation of the Design Code, the redevelopment of the Site will introduce high quality, contextual architecture, perceptible over these distances.
- 8.9
- Importantly, the redevelopment of the Site in principle, with residential uses, consistent with the emerging urban context of the local area, including that surrounding the listed building, will not affect the core characteristics which contribute most to the building's significance. This includes its inherent architectural qualities, and historic interest for forming an early example of the Kahn construction system. Those principal facets will continue to contribute to the listed building's significance, which will remain unaffected by the Proposed Development.

CONSERVATION AREAS

BOTWELL, THORN EMI

- 8.10
- The Botwell, Thorn EMI Conservation Area captures an area of land to the north of the Great Western Railway line once associated with vinyl manufacturing and industry, known at the Old Vinyl Factory and the former headquarter site of EMI. The conservation area holds a high degree of historic interest, while its character can largely be defined as its collection of historic 20th century vinyl manufacturing buildings.
- 8.11
- The conservation area is experiencing a high degree of change as its existing historic buildings are being repurposed and office or residential uses, with new built form being developed as part of the wider regeneration of the area.
- 8.12
- The Site, located to the south of the Great Western Railway and somewhat removed from the immediate setting context of the conservation area, makes no contribution to the area's significance by virtue of setting, forming part of a series of commercial buildings from the 21st century.
- 8.13
- The Proposed Development will transform the Site and result in residential-led regeneration. It includes the introduction of building scales of between 3-11 storeys which will be seen beyond the boundaries of the conservation area and within an urban setting which includes buildings of varying scales and proportions, with new buildings being largely residential in use. It is not considered that the introduction of new residential built form at the scale proposed stands to result in a material setting effect, given the conservation area is physically and visually disconnected from the Site. Equally, the scale and form of the Maximum Parameters is consistent with the scale of modern development seen within and on the periphery of the conservation area.
- 8.14
- The Proposed Development secures a high-quality landscaping and public realm strategy, presented on Parameter Plan 3 – Hard and Soft Landscaping, as well as improved pedestrian connectivity through the local area through the delivery of a new pedestrian crossing along North Hyde Road. This improved connectivity has the ability to better movement to and from the wider and emerging Old Vinyl Factory Site, potentially enabling high numbers to experience and appreciate the conservation area's significance (enabling a more direct pedestrian route from Millington Road, through to Dawley Road and onto 'Record Walk').

8.15 Owing to visibility being concentrated along Powerhouse Lane and glimpsed views between buildings (see **Figure 2.1**), coupled with the emerging regeneration of the area and the lack of contribution setting and the Site makes to the character and appearance (significance) of the conservation, it is not considered that the redevelopment of the Site to the parameters secured through the Outline application stands to result in a material setting impact, with the significance of the conservation area preserved and unaffected.

NON-DESIGNATED HERITAGE ASSETS

LOCALLY LISTED BUILDINGS

LOCALLY LISTED BUILDINGS WITHIN THE BOTWELL, THORN EMI CONSERVATION AREA

8.16 The group of Locally Listed Buildings within the Botwell, Thorn EMI Conservation Area have been grouped together owing to their shared historic interest and interrelationship, forming a collection of historic buildings associated with the former EMI complex. The building’s have a shared setting context, with any contribution made to significance by that context largely derived from the existence of historic manufactory and industrial buildings, associated with the vinyl manufacturing industry of the late–19th and early–20th century.

8.17 The buildings within this group include:

- Thorn/ EMI Building, Hayes (Botwell), Blyth Road, Hayes
- HMV/ EMI Building, Hayes (Botwell), Blyth Road, Hayes
- Apollo House, 120 Blyth Road, Hayes
- Neptune House, Blyth Road, Hayes
- Former HMV/ offices/ Jupiter House, Blyth Road, Hayes

8.18 The Site is located to the south of the group, beyond the Great Western Railway Line. Its modern commercial, somewhat campus style aesthetic makes not contribution to the significance of the locally listed buildings within the conservation area and is read as part of a wider urban setting context experiencing high levels of regenerative change.

8.19 The Proposed Development will be seen amongst this emerging residential-led regeneration of the town centre and its surroundings, within visibility in the context of these locally listed buildings only achieved in glimpsed southward views. It is not considered that such visibility stands to give rise to an adverse or material setting impact, with the significance of

the locally listed buildings unaffected. Their significance will remain routed in their historic interest and high degree of group value with one another.

CUMULATIVE

8.20 The cumulative schemes relevant to the assessment of heritage effects are set out in **Section 2.0** of this report. They largely comprise new residential development to the north of the Site, including Keith House (East and West Plots), further regenerative change within and surrounding the Botwell, Thorn EMI Conservation Area and the emerging residential-led masterplan at the former Nestles Site to the north of North Hyde Road (to the east of the Site).

8.21 It is not considered that the addition of the Proposed Development to this emerging residential context stands to give rise to any impacts on the heritage assets located to the north of the Great Western Railway and within the former EMI complex, largely as these assets are already experienced within a townscape with a juxtaposition between historic, 20th century manufacturing and industrial character buildings and modern residential-led regeneration, synonymous with a town centre location.

9.0 ASSESSMENT: TOWNSCAPE

HYDE PARK, HAYES, UB3 4AZ

ASSESSMENT: TOWNSCAPE

- 9.1 The following section assesses the effect of the Proposed Development on the identified townscape character areas set out in **Section 6.o**.
- 9.2 The Design and Access Statement provides a detailed discussion on the design rationale and architectural approach.
- 9.3 The Site is located within TCA 1: Institutional/ Commercial, with Emerging Residential, which includes land largely characterised by its large footprint commercial and industrial-style development, with a generally coarse urban grain and emerging regenerative development – in the form of residential-led mixed use schemes. Building footprints are generally large, and the general quality of the area is mixed, with some historic commercial and former industrial development situated to the north of the Great Western railway. It does not include uses which accord with and complement those across the wider locality, particularly the swathes of residential uses to the south, east and west, and does not accord with an emerging townscape seen locally, including across the Botwell MEI site to the north of the Great Western Railway (which includes a mixed urban townscape and an intensification of residential uses).
- 9.4 As noted in **Section 6.o**, owing to the urban grain and townscape context of the study area, coupled with the nature and extent of the Proposed Development, a number of townscape character areas have been scoped out from this assessment, owing to the Proposed Development having no ability to alter or change their townscape qualities, or how the receptors experience the townscape characteristics of the area. The areas scoped out include:
- TCA 2b: Residential (Apartments)
 - TCA 2c: Residential (Cul-de-Sac)
 - TCA 3: Campus/ School/ Public Uses
 - TCA 5: Open Space
 - TCA 6: Travel Infrastructure

9.5 The following assessment applies the methodology outlined in **Section 2.o** to determine the nature of impact on townscape character.

DIRECT TOWNSCAPE IMPACTS
TCA 1: INSTITUTIONAL/ COMMERCIAL, WITH EMERGING RESIDENTIAL

- 9.6 The townscape value of TCA 1 is identified in **Section 6.o**, along with an assessment of its townscape characteristics (including uses, scale and form of development). The area can largely be defined through its routes and origins with commercial/ industrial development, with building scales, footprints and character illustrative of such development during the turn of the 20th century (i.e. including buildings of a coarse urban grain and large footprint, synonymous with their historic uses).
- 9.7 The character area includes the Site, which is formed of two office buildings and a multi-storey carpark, separated by inactive and underutilised spaces. There is an inward facing character to the Site, with a lack of ground-floor activation or no clear sense of hierarchy, with buildings all of a similar area, footprint, scale and form.
- 9.8 The Proposed Development seeks to introduce positive changes to the Site which are comprehensive in nature and deliver high-quality homes which are sensitively integrated with a coherent building form and character.
- 9.9 The configuration and form of the development on the Site and way in which it operates and interacts with the wider townscape has been developed with an understanding of the surrounding townscape context, with opportunities to better integrate the Site in with its existing and emerging context. This includes introducing generous green open space, arranging built form and public realm in a way which can strengthen the interface with neighbouring plots and introducing new pedestrian and cycle routes improving access and site permeability.
- 9.10 The Application is submitted in Outline, with all matters reserved except for access. The application is supported by a suite of parameter plans, including Building Zones, Access and Movement, Hard and Soft Landscaping, Building Heights, Land Use and Trees. It is also supported by a Design Code, which when paired with the submitted parameter plans, defines key design principles which will guide future development. The document includes a set of 'musts' and 'shoulds' which we refer to below to understand the Proposed Development's impact on the immediate townscape.

USE

- 9.11 The Proposed Development puts forward a residential-led development with an illustrative unit number of 652. The proposals represent a change in character across the Site, shifting from an Office use to residential. Such a shift was supported by the Greater London Authority (the 'GLA') who noted that *'despite the absence of a designated site allocation, the residential-led redevelopment of the site could be justified in this location subject to detailed justification for the loss of office floorspace in this part of the borough'*.
- 9.12 The proposed change of use from Office to Residential across the Site is considered to result in positive townscape improvements, including the creation of a new and active community, with associated benefits in relation to public realm, architecture of a finer, more human-scale and improved permeability. Equally, a residential use accords with the primary uses seen locally, including well-established residential areas to the south, east and west (as well as to the north along Keith Road), and an emerging townscape context across TCA1 that includes similarly scaled regenerative development.
- 9.13 Parameter Plan 5 – Land Use includes the potential to introduce Class E to Blocks A1 and A2 (see **Figure 9.1**), to the north of the Site, referred to within the DAS as the 'Gateway'. The location of such uses on the eastern frontage of Building A1, or the southern frontage of Building A2 will assist in drawing people through and into the Site, marking the northern portion of the Site as a primary pedestrian entrance and marker, with a new crossing proposed across North Hyde Road (secured through Parameter Plan 2 – Access and Movement).

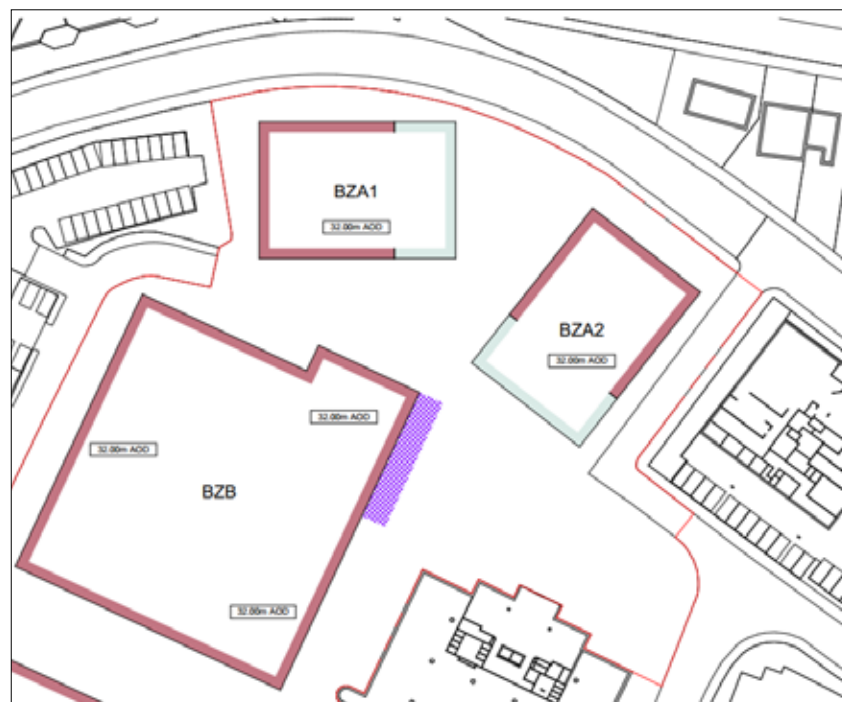


Figure 9.16 Extract from Parameter Plan 5 – Land Use

- 9.14 The mix of uses complements the primary residential use of the development and we such a mix as being complementary to the area and resulting in positive change to the Site and wider townscape area.
- 9.15 In addition, the proposed residential-les use following the direction of development seen across the area, including regenerative development across the Thorn, EMI complex, as well as more locally, including the emerging development at the West and East plots of Keith House North (ref. 27189/APP/2021/2782 & 27189/APP/2020/2181).



Figure 9.17 The 'Gateway' CGI – showing illustrative architectural proposals and delivery of the pedestrian crossing on North Hyde Road

HEIGHT, SCALE AND MASSING

- 9.16
- Building heights across TCA 1 range from single and two storey buildings (largely in the form of light industrial development) to 11-storey residential (associated with an emerging townscape character of residential-led regeneration). There are historic buildings of some scale to the north of the Great Western railway line, including those within the Thorn, EMI Conservation Area, with their scale and form illustrative of their historic uses.
- 9.17
- The height, scale and massing strategy has been informed by pre-application engagement with the GLA and the LPA, in order to respond to the existing and emerging townscape context. The Proposed Development puts forward a height sensitive approach which responds to the proximity of neighbouring residential development, with a height strategy which ranges from 3 to 11 storey accent buildings. The maximum building height is located at Block A1 and to the north-eastern corner of Block B, the latter of which is situated at the heart of the development, with the 11-storey element fronting an area of open space.
- 9.18
- The height, scale and massing strategy will contribute to a varied and visually interesting skyline, aiding with wayfinding and placemaking. This variation in height and massing arrangement is secured by DC 3.15 (Height Variety), which notes that each group of blocks must accommodate buildings with a variety of heights, and there should be clear height differentials and respond positively to adjacent structures, entrances and public spaces, including townscape focal points.
- 9.19
- The Design Code stipulates that the tallest buildings within the masterplan should be Blocks A1 and B2, forming Accent Buildings (DC 3.17). The scale of A1 forms a helpful wayfinding tool and marks the entry point into the development, while also responding to the emerging scale to the immediate north-west at Keith House. The stepping down to Block A2 also ensures a responsive height rationale to the neighbouring Premier Inn building to the east of the Site, while the singular form aids with permeability (both visual and physical).
- 9.20
- The architectural quality of these tallest buildings is also controlled by DC 3.19, which notes that Accent buildings must demonstrate a high standard of architectural design and that these should positively contribute to the townscape through innovative use of form, materials and detailing, while maintaining coherence with the surrounding townscape. Coupled with DC

4.15 (Proportions), which notes that taller buildings within the development must meet the sky sensitivity and a material palletted being primarily brick and masonry (DC 4.17), such design mechanisms enable a breaking down of scale through architectural devices and façade detailing. Such coding will bring a human-scale to elevation treatment, breaking down a perception of mass.

- 9.21
- The height scale and massing of the Proposed Development is considered consistent with the emerging townscape character of the area, including emerging residential developments to the immediate north of the Site at Keith House, and residential development to the north of the Great Western Railway. It is not considered to give rise to any adverse townscape effects on the immediate character of the area and is consistent with the scale of regenerative residential development seen locally.

ARCHITECTURE AND MATERIALITY

- 9.22
- The existing buildings across the site (which form part of the TCA) lack aesthetic cohesion and are of limited architectural quality. They do not respond positively with the uses or finer grain of the surrounding area and are a reflection of their function.
- 9.23
- The Proposed Development puts forward an outline application which secures a residential-led masterplan across the Site, putting forward an opportunity to introduce new development which is responsive to place, and delivers high quality development, enhancing the overall quality of the architecture within the TCA. The wider masterplan vision aims to ensure the development takes cues from the area’s distinct character taking cues from modernist and art deco buildings, suggesting a material palette that is informed by place.
- 9.24
- Design Codes DC 4.13 and 4.14 (Materiality) notes that the palette of materials must respond to the Site’s context and history and the choice of materials must be based on the robustness and ability to weather well, including solidity. The building proportions across the development is secured by DC 4.15, with the form and the façade distinctions required to be well proportioned and harmonious, maintaining a consistent rhythm. Such mechanisms will ensure high-quality detailed design, and contribute positively to the character of the immediate townscape (as illustrated by the illustrative CGI at **Figure 9.3**).



Figure 9.18 Illustrative CGI, showing indicative architectural response, informed by Design Code

PUBLIC REALM AND LANDSCAPING

- 9.25 The Site currently lacks a comprehensive and positive landscape quality. It includes tree planting, hedgerows and green verges along plot boundaries, which do help soften the urban character of the area, including the large areas of hardstanding and lack of pedestrianisation. The comprehensive nature of the Proposed Development offers an opportunity to introduce a high-quality landscaping scheme, supporting the primary residential use proposed.
- 9.26 The Hard and Soft Landscape Parameter Plan indicates that a large proportion of the Site will be given over to open space and public realm enhancements. Vehicular access will be limited to a small area around Building D to the south of the masterplan, as well as to the north-west along Millington Road. Buildings will be encompassed by front gardens, while larger open spaces are indicatively indicated as being ‘Space Nodes’, including the ‘Gateway’, the ‘Social Heart’ and the ‘Nurture Gardens’. Tree lined pedestrian and connecting routes will greatly enhance the townscape quality of the area, resulting in a townscape benefit, providing new public amenity space and open green areas.

SUMMARY OF TCA 1 IMPACTS

- 9.27 The assessment of the Proposed Development on TCA1: Institutional/ Commercial, with Emerging Residential can be summarised as follows:
 - New uses that are either consistent with, or complementary to the emerging townscape character of the area, according to the regenerative direction of the area.
 - The proposed uses transform a Site with a coarse urban grain which lacks any coherence with the surrounding townscape character areas, including TCA 2: Residential.
 - The introduction of new and complementary uses to the area, including residential.
 - High quality design would be delivered through contextual and high-quality architecture, secured through the Design Code and suite of Parameter Plans submitted with the application.

- A site wide landscape and public realm strategy which will deliver substantial benefits to the Site in the context of the immediate and surrounding townscape.
- Increased permeability through the Site and the created of a new public green/ open space at the heart of the development.

- 9.28 The new use, architectural response and landscape design is considered to create a distinct sense of place, which builds on the emerging characteristics of the area. It will deliver positive change with uses that accord the surrounding context of residential uses and with improved architecture though contextual, high-quality development.

INDIRECT TOWNSCAPE IMPACTS

TCA 2A: RESIDENTIAL (TERRACES, METRO-LAND, PLOTLAND, GARDEN CITY ESTATES)

- 9.29 The townscape in TCA 2a: Residential (Terraces, Metro-Land, Plotland, Garden City Estates is described in **Section 6.0** of this report.
- 9.30 The area covers a large portion of land to the south, east and west of the Site, and comprises smaller-scale, largely two-storey residential development. It includes development spanning from the turn of the 20th century to mid-century development, with many properties experiencing high levels of alteration and modernisation, with high levels of on and off-street parking. Architectural styles and aesthetics differ across the area dependant on the period of construction, ranging from more traditionally built red brick properties along Bushey Road, to pebble dash and concrete rendered elevations to properties along Dawley Road and Bourne Avenue. The extent of alteration, low-quality frontages in many parts of the area and the high levels of movement and off and on street parking diminish the overall townscape quality. There is an awareness across the area too of the location relative to the town centre, existing commercial development and the emerging regenerative development surrounding it (see **Figures 9.4 and 9.5**).



Figure 9.19 Visibility of modern office development (the Site) in relation to TCA 2 along Colbrook Avenue



Figure 9.20 Visibility of modern office development (the Site) from Dawley Road

- 9.31 The ZTV at **Section 2.0** illustrates that the Proposed Development will be visible from within the context of TCA 2, and it is anticipated that such visibility will be largely manifested in glimpsed and incidental views along linear streets and within the context of modern development, including larger built form close to the Site, and regenerative residential development more widely (for example to the north of the Great Western Railway, or to the north of Nestles Avenue and part of 'Hayes Village'.
- 9.32 As one moves across TCA 2, there is awareness of one's location relative to the more commercial and larger-scaled town centre. Such perception stems from the populated thoroughfares of Dawley Road and Station Road, where one can experience longer distance views and visibility of development at a scale of 8–11 storeys (see **Figure 9.6**).
- 9.33 The Proposed Development will introduce new residential development beyond the boundaries of the TCA. The residential use is considered to be complementary and commensurate with the overarching townscape character of TCA 2, and will reinforce the residential uses across the area more broadly. The enhanced ground floor and landscaped areas will bring new public open space and activation to the periphery of the character area, while visibility of development of 8–11 storeys will be seen within the context of larger scale developments, including Cavenham Court and residential development to the north and south of the Great Western Railway.
- 9.34 The Proposed Development will sit within the context of emerging regeneration and the primary characteristics of the TCA will remain unaffected and possibly enhanced through the delivery of high-quality architecture, with a material palette informed by the high use of masonry across the local area (as secured by DC 4.17 (see Design Code).
- 9.35 The delivery of the North Hyde Road Crossing (see Parameter Plan 2 – Access and Movement) will introduce new pedestrian routes linking TCA 2 and TCA 1, while also enabling better connectivity through the local area, including through TCA 2 from Keith Road through to the residential suburbs to the south of the town centre. We see this improvement connectivity and permeability, enhanced by new landscaping and public open space, as representing beneficial effect to the quality of the townscape in relation to TCA 2.



Figure 9.21 Visibility of larger scale development to the north of Station Road, facing north-west towards North Hyde Road

TCA 4: HAYES TOWN CENTRE

- 9.36

TCA 4 is located to the north of the Site, beginning at the vehicular and pedestrian bridge over the Great Western Railway line, close to Hayes and Harlington Railway Station.
- 9.37

The TCA is characterised by its commercial ground floor frontages and a range of architectural styles and forms, with a mix of uses expressive of an urban centre.
- 9.38

The TCA shares limited intervisibility with these existing buildings on the Site, which are only discernible in longer distance views from the elevated position on the Station Road Bridge. In this context, the Site is seen as part of the wider commercial and industrial character of the town centres setting, with the broad building forms and lack of articulation and variation creating a monogenous roofscape of little skyline quality.
- 9.39

The Proposed Development will introduce new residential development to the south of the Great Western Railway, visible in views south-west from the elevated bridge at Station Road. From this position, it will be read as part of an emerging residential regenerative context. The varying scales across the Site, stepping down in height to the centre with accent buildings of between 8–11 storeys, will add variation to the skyline and result in a betterment when seen in the wider context of the town centre.

CUMULATIVE

- 9.40

The cumulative schemes relevant to the assessment of heritage effects are set out in **Section 2.0** of this report. They largely comprise new residential development to the north of the Site, including Keith House (East and West Plots), further regenerative change within and surrounding the Botwell, Thorn EMI Conservation Area and the emerging residential-led masterplan at the former Nestles Site to the north of North Hyde Road (to the east of the Site).
- 9.41

In the context of TCA 1, the cumulative scenario includes an intensification of residential development, associated with a change of character seen across the area. The Proposed Development 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.
- 9.42

As illustrated in the suite of AVRs, in the context of the surrounding residential suburbs (TCA 2), in the cumulative scenario, the Proposed Development will be seen alongside a context of similarly proportioned and scaled buildings. It will form part of a wider area of residential-led regeneration that will bring high-quality architecture, improved ground floor activation, public realm and improved wayfinding and permeability.
- 9.43

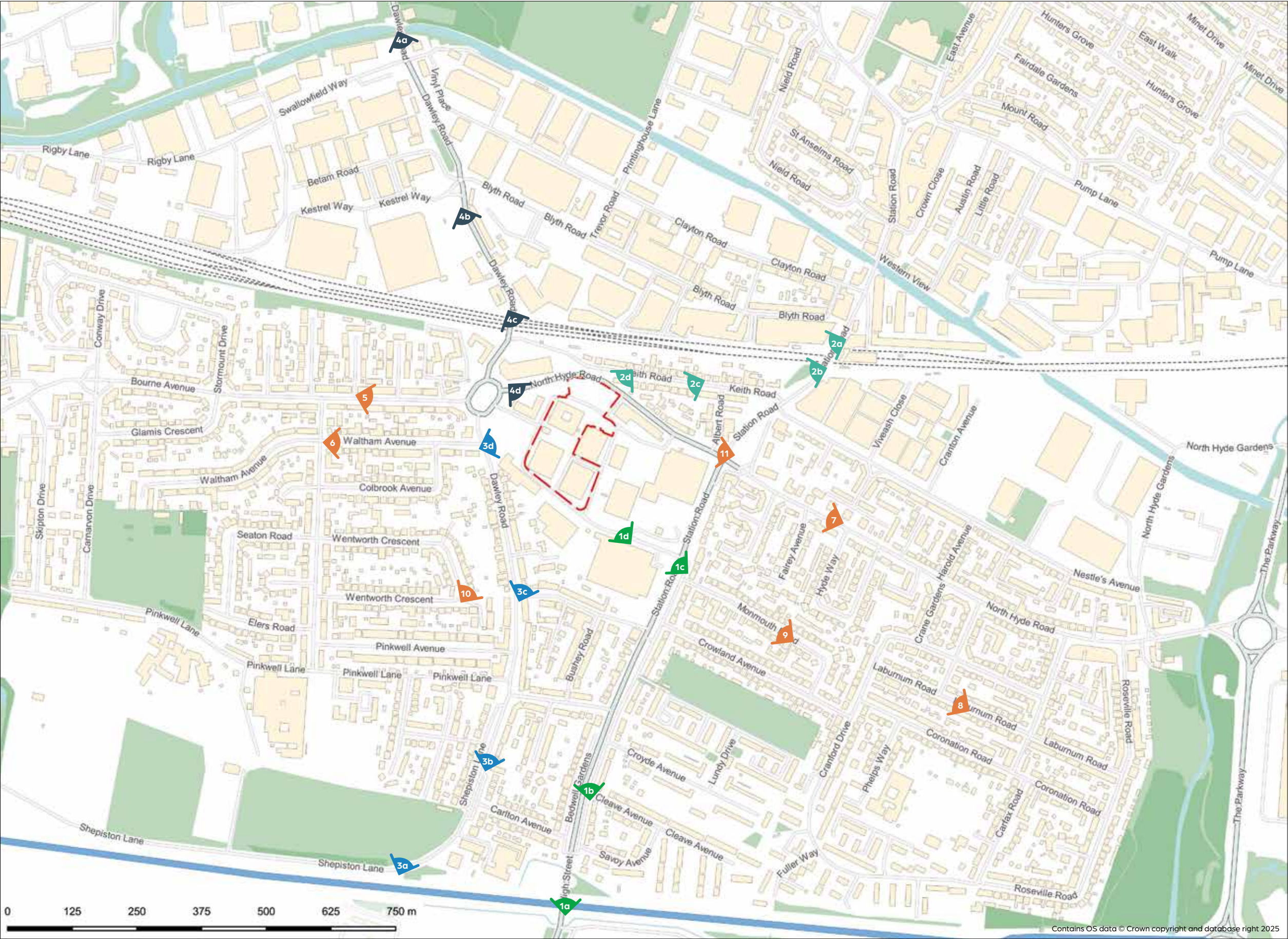
It is not considered that the addition of the Proposed Development to this context stands to increase the intensity of effects already identified, or alter the conclusions already identified and rather contributes positively to the emerging character of the area.

10.0 ASSESSMENT: VISUAL

HYDE PARK, HAYES, UB3 4AZ

ASSESSMENT: VISUAL

10.1 This section assesses the likely effects arising from the impact of the Proposed Development on the visual receptors identified in **Section 7.0** of this report. For ease of reference, the View Location Plan is provided at **Figure 10.1**, with viewpoints used as reference and guides to inform the assessment.



VIEWPOINT LOCATION PLAN

- Application Site (indicative)
- 1a. Harlington Bridge
- 1b. High Street
- 1c. Station Road
- 1d. Millington Road
- 2a. Hayes & Harlington Station
- 2b. Station Road
- 2c. Keith Road
- 2d. Keith Road
- 3a. Shepiston Lane
- 3b. Shepiston Lane
- 3c. Dawley Road
- 3d. Dawley Road/ Waltham Avenue
- 4a. Dawley Road at Grand Union Canal
- 4b. Dawley Road
- 4c. Dawley Road
- 4d. Dawley Road
- 5. Bourne Avenue
- 6. Waltham Avenue
- 7. North Hyde Road
- 8. Laburnum Road
- 9. Monmouth Road
- 10. Wentworth Crescent/ Clifford Gardens
- 11. North Hyde Road/ Station Road

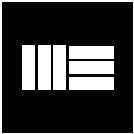
LOCATION:
Hyde Park, Hayes

DATE:
July 2025

SCALE:
1:7,500 @ A3

FIGURE 10.1 Viewpoint Location Plan

▲ NORTH



MONTAGU EVANS
CHARTERED SURVEYORS
70 ST MARY AXE,
LONDON, EC3A 8BE
T: +44 (0)20 7493 4002
WWW.MONTAGU-EVANS.CO.UK

REPRESENTATIVE VIEWS AND EFFECTS ON VISUAL RECEPTORS

10.2 The assessment is informed by the ZTV at **Figure 2.1 (Section 2.0)** and the verified views provided at **Appendix 3.0**.

RESIDENTS ACROSS HAYES' SOUTHERN SUBURBS

10.3 Receptors in this group are likely to be heavily engaged in views and visual amenity within the surrounding area. The receptor group covers a broad range of people residing to the south of Hayes town centre, though the centre will be seen across large distances, including between gaps between properties and along linear north-south routes (including Station Road and Dawley Road. While the primary experience of receptors within this group will be associated with daily activities associated with their place of residence, there is a busy, urban character to the area, with high levels of traffic and movement, owing to the relatively high density. Equally, the extent of on and off-street parking, and busy character of Station Road and Dawley Road further the experience of receptors and reinforce the location relative to the town centre.

10.4 The Proposed Development will introduce new residential development to the north of the southern residential suburbs of the town centre. It will replace existing commercial and office development visible in views along linear views. This change in character from commercial/ office to residential is seen as constituting a beneficial effect on receptors' experience of the area, replacing buildings of a relatively poor and commercial character with high-quality development with a material palette informed by context (including the eclectic mix of residential styles seen locally (see Design Code, specifically DC 4.13).

10.5 From the west (see View 5, Bourne Avenue, **Figure 10.2**, and View 6, Waltham Avenue, **Figure 10.3**), the Proposed Development will be seen beyond and within the context of existing built form of Cavenham House. The Maximum Parameter wireline illustrates an increase in scale and built form in such eastern views, though such an increase in scale will be seen in the context of a change in land use, with buildings of a smaller footprint than the coarser grain commercial units currently occupying the Site, coupled with a more refined elevation treatments and crown design, as secured by the Design Code (see DC 3.18, DC 4.35, DC 4.36, DC 4.38, DC 4.41, DC 4.43 and DC 4.44 – all of which control façade and building articulation, including fenestration depth etc.).



Figure 10.2 Proposed View 5: Bourne Road



Figure 10.3 Proposed View 6: Waltham Avenue

10.6 Equally, the proposed Maximum Parameter wireline in View 7, North Hyde Road (see **Figure 10.4**) and View 9: Monmouth Road (see **Figure 10.5**), indicates an increased perception of scale and built form in medium distance linear views from the east, looking west. From these locations, receptors will be aware of the populated thoroughfare of Station Road to the west, as well as a mixed urban townscape to the north/ north-west, including emerging residential-led regeneration close to the Great Western Railway. They will also be aware of the existing character of the Site, which includes buildings of little architectural quality with long blank elevations and a monolithic form and elongated roofscape.

10.7 The Maximum Parameter represented in Views 7 and 9 illustrates maximum development areas. The maximum building heights, secured through Parameter Plan 4 – Building Heights ensures massing across the masterplan is broken down and refined through elevation treatment and a transition in scale. This includes a stepped height arrangement across Blocks A1 and A2, with Block A2 proposed with a maximum height of up to 8-storeys, stepping down to the part-5, part-4 storey hotel building of Premier Inn to the east (seen in View 7).



Figure 10.4 Proposed View 7: North Hyde Road

- 10.8 Similar to receptors situated to the west of the Site, receptors residing to the east will experience an increase in building heights across the Site as part of the regeneration of the Site and a change in land-use, consistent with the emerging townscape character seen across and surrounding the town centre and within the broader locality. View 9 illustrates the maximum extent of visibility within this context, with the maximum height parameter illustrating development will be brought forward at Reserved Matters stage with a variation in scale across Block D, and at a height consistent with a change in grain and urban form where Station Road cuts through the area on a north-south axis.
- 10.9 Within longer distance views (see View 8, Granville Road, **Figure 10.6**), receptors will largely be unaware of the Proposed Development, with any visibility seen across a long distance and only the uppermost levels of the scheme visible beyond intervening vegetation and built form.
- 10.10 The receptor group is also represented in linear views looking north, including along Shepiston Lane which includes residential properties on its eastern and western sides. As existing, receptors here are aware of a change in character and grain to the north, including to the Site, within existing commercial/ office development visible beyond the roofline of smaller-scale, two-storey residential properties (see **Figures 10.7 and 10.8**).



Figure 10.5 Proposed View 9: Monmouth Road



Figure 10.7 Visibility of Commercial/ Office Development to the north of Shepiston Lane



Figure 10.6 Proposed View 8: Granville Road



Figure 10.8 Existing View 3b: Shepiston Lane

- 10.11 The proposed wireline view (see **Figure 10.9**) from Dawley Road/ Shepiston Lane illustrates the extent of visibility of the Proposed Development along the northern approach. In the context of receptors residing in the area, the proposals represent a positive change in land character, replacing a group of commercial and office buildings of little articulation and quality, with a residential use that is consistent with the prevailing land character seen locally, and with buildings of a high design quality, secured by the submitted Design Code. The variation in height and scale, as represented by **Figure 10.9**) also ensure variation in form and a visually engaging skyline, which will improve the outlook of residents when compared with the existing situation.
- 10.12 From the north, the receptor group captures those residing along Keith Road. As noted in **Section 6.0**, receptors in this location will be acutely aware of the emerging residential context to the north, with buildings of a larger scale (approx. 10–11 storeys) situated to the north of the Great Western Railway line visible from rear gardens, as well as in views between buildings. Receptors will also be aware of the high levels of movement, including the populated thoroughfare of North Hyde Road, Station Road to the east, and the railway line bounding properties to the immediate north.
- 10.13 The Proposed Development will introduce new residential development of between 8 and 10 storeys to the south/ south-west of Keith Road (see **Figures 10.10 and 10.11**). The wireline in Views 2c and 2d illustrate the maximum extent of visibility and represent the maximum heights and developable areas presented as part of the suite of parameter plans. **Figures 10.12 and 10.13** illustrate how a scheme could come forward at reserved matters stage with a stepped massing arrangement and façades articulated through fenestration and balcony treatment.
- 10.14 The intensity of effect will be greater for those residing to the western end of Keith Road (as illustrated by View 2d – **Figure 10.11 and 10.13**), though such an experience must be seen in the context of an urban townscape context, which includes an existing awareness and perception of higher density residential development, as well as major travel infrastructure. The Proposed Development will introduce development of a greater scale, though such scale will be seen as part of a wider masterplan proposal which secures enhanced public realm, better connectivity and architecture of a high quality, secured by the Design Code.



Figure 10.9 Proposed View 3b: Shepiston Lane



Figure 10.10 Proposed View 2c: Keith Road



Figure 10.11 Proposed View 2d: Keith Road



Figure 10.12 Proposed View 2c: Keith Road (Illustrative)



Figure 10.13 Proposed View 2d: Keith Road (Illustrative)

10.15 In conclusion, it is considered that the Proposed Development gives rise to beneficial effects on the visual amenity of residents residing across the southern suburbs of Hayes. It will introduce high quality architecture to the area, secured by design codes, at a scale that is consistent with an emerging residential townscape context, with uses consistent with those seen to the south of the Great Western Railway line.

USERS OF VEHICULAR AND PEDESTRIAN ROUTES

- 10.16 Receptors using vehicular and pedestrian routes will largely be focussed on the levels of vehicular and pedestrian traffic. Along primary routes (for example along Station Road, Dawley Road/ Shepiston Lane), receptors will be highly engaged with the high levels of movement, including populated junctions and traffic flow. Along these principal thoroughfares, the linear character affords longer distance views towards the town centre, where receptors will be aware of larger-scale development, differing to the character of the residential suburbs to the south. They will be aware of the Site within this context, including is more commercial/ office character, with elevations which contrast with the materiality and character to the prevailing residential context.
- 10.17 The Proposed Development will be visible in linear views north along primary vehicular routes (see Views 1a (Figure 10.14), 1b (Figure 10.15), 3b (Figure 10.16), 3c (Figure 10.17), 4a (Figure 10.18) and 4b (Figure 10.19). In such views, the Proposed Development will introduce a varied roofscape that will be peripheral to the primary focus of the group. The variation in scale (secured through Parameter Plan 4 – Building Heights) will contribute positively to skyline, while visibility of the upper storeys of buildings and architectural character, secured by the suite of Character and Appearance Design Codes, will aid with wayfinding as receptors travel across the locality.



Figure 10.14 Proposed View 1a: Harlington Bridge



Figure 10.16 Proposed View 3b: Shepiston Lane



Figure 10.18 Proposed View 4a: Dawley Road at Grand Union Canal



Figure 10.15 Proposed View 1b: High Street



Figure 10.17 Proposed View 3c: Dawley Road



Figure 10.19 Proposed View 4b: Dawley Road

10.18 More locally, the Proposed Development secures a better connected and permeable masterplan, opening up new pedestrian routes through the area. The new North Hyde Road pedestrian junction (secured through Parameter Plan 2 – Access and Movement, and Parameter Plan 3 – Hard and Soft Landscape) will enhance how the area functions for pedestrians, with new public realm and associated landscaping constituting a benefit for pedestrians moving through the area.

COMMUTERS/ USERS OF PUBLIC TRANSPORT

- 10.19 This receptor group captures those using Hayes and Harlington Station. It is represented by elevated views across the pedestrian and vehicular bridge across the Great Western Railway line.
- 10.20 The Proposed Development represents a change in character across the Site in elevated views to the south-west. As existing, the Site does not contribute positively to the skyline in such views and is rather read as a monolithic, commercial development with little roof articulation and a material palette demonstrative of its uses.
- 10.21 Receptors in this group will be acutely aware of the established and emerging residential regeneration seen across the local area, including to both the north and south of the railway line. The Proposed Development will form part of this emerging context, with a variation in height and form secured by the Parameter Plan 4 – Building Heights, which sites two ‘Accent Buildings’ to the west and centre of the masterplan, with intermediary buildings of 8–storeys (Block A2) and 6–storeys (Block B). The variation in scale, coupled with the change in character from commercial/ office is considered to represent a beneficial visual effect in views from Station Road bridge.
- 10.22 Equally, the Design Code secures specific design mechanisms which ensure a Reserved Matters proposal brings forward high-quality design, including using a robust material palette (DC 4.14) and a palette which responds to the Site’s context (DC 4.13), with buildings having a base, middle and top distinction and form and façade proportions that are well proportioned and harmonious (DC4.15). Such coding stands to give rise to additional beneficial visual effects.

USERS OF COMMERCIAL / INDUSTRIAL CLOSE TO THE SITE

- 10.23 This receptor group includes those using commercial/ retail units close to the Site, as well as light industrial uses to the immediate south of Millington Road. As existing, receptors will have little visual or visual interaction with the Site, which includes elevations of little to no articulation. They will be aware of the Site’s commercia/ office character, though will not be engaged in views towards it.
- 10.24 The Proposed Development puts forward transformative change across the Site, primarily secured through a change in land-use, introducing a new residential use. The residential use will be supported by new landscaping and public realm improvements, including new pedestrian routes through the Site from Millington Road, towards a new area of public open space (see Parameter Plan 3 – Hard and Soft Landscape).
- 10.25 View 1c and 1d illustrate the extent of visibility of the Proposed Development from Millington Road, as well as its junction with Station Road to the west. From these locations, the maximum parameter wireline illustrates the scale of the proposals will sit comfortably to the west of existing commercial uses, while the stepped height arrangement of Block D (see also **Figure 10.22**) will break down as perception of mass and scale, which will be further broken down through façade articulation and materiality (see Character and Appearance Chapter of Deign Code).
- 10.26 The replacement of an existing multi-storey carpark and the introduction of a comprehensive and high-quality residential scheme which accords with the parameters secured through the suite of Parameter Plans and Design Code submitted as part of this application, stands to result in beneficial effects on receptors using commercial and industrial uses close to the Site’s boundaries, introducing high-quality, positive regeneration.



Figure 10.20 Proposed View 1c: Station Road



Figure 10.21 Proposed View 1d: Millington Road



Figure 10.22 Proposed View 1d: Millington Road (Illustrative)

CUMULATIVE ASSESSMENT

- 10.27 The cumulative schemes relevant to the assessment of heritage effects are set out in **Section 2.0** of this report. They largely comprise new residential development to the north of the Site, including Keith House (East and West Plots), further regenerative change within and surrounding the Botwell, Thorn EMI Conservation Area and the emerging residential-led masterplan at the former Nestles Site to the north of North Hyde Road (to the east of the Site).
- 10.28 Across the suite of AVRs, the schemes which share primary intervisibility with receptors include Keith House (both West and East Plots) and HPH4, situated to the west of the Site. In all views, the scale of the Proposed Development is consistent with the height, scale and massing arrangement of the immediate emerging context, and in medium and longer distant views, the Proposed Development will form part of a wider complex of development associated with the regeneration of the town centre and its surrounding environs. It will form part of a wider area of residential-led regeneration that will bring high-quality architecture, improved ground floor activation, public realm and improved wayfinding and permeability.
- 10.29 It is not considered that the addition of the Proposed Development to this context stands to increase the intensity of effects already identified, or alter the conclusions already identified and rather contributes positively to the emerging character of the area, delivering high-quality and contextual architecture, as secured by the submitted Design Code.

11.0 CONCLUSION

HYDE PARK, HAYES, UB3 4AZ

CONCLUSION

11.1 Montagu Evans LLP has been instructed by Columbia Threadneedle Investments to provide consultancy and prepare this assessment of proposals which are subject to an application for Outline Planning Permission with all matters reserved excluding access, securing the delivery of residential development comprising a total of 662 residential units.

11.2 The assessment as a whole is supported by 23 accurate visual representations. The location of viewpoints has been informed by architectural and historic accounts of the area, an appraisal of the existing Site and surroundings, relevant policy designations and the production of a ZTV. Viewpoint locations have been agreed with Officers at the Council during pre-application engagement stages. The full suite of verified views is provided at **Appendix 3.o**.

THE SITE AND CONTEXT

11.3 The Site comprises two commercial buildings and an existing multi-storey carpark. The buildings across the Site are largely unoccupied and the character of the Site is one that lacks any visual or physical activation, being largely devoid of activity.

11.4 The Site forms part of the Hyde Park, Hayes commercial complex, which includes a series business and retail uses (with emerging residential), spanning an area of land from Dawley Road to North Hyde Road.

11.5 Buildings across the Site range from between 4-5 storey with large floor to floor heights and expansive floorplates. It is situated within an emerging context of tall building, residential development, including emerging development at Keith House (Eastern and Western sites), located to the Site's immediate north-west. Its use (being commercial) is somewhat an anomaly to the prevailing townscape context which includes swathes of residential uses, with the proposals offering an opportunity for positive, transformative change.

11.6 The surrounding context to the south, west and east is largely residential, with a small area of residential also situated on a triangular plot between North Hyde Road and the Great Western Railway Line, known as Keith Road.

11.7 In relation to connectivity, the Site is located close to the town centre, being within walking distance of Hayes & Harlington Railway Station (PTAL 4).

11.8 Within the context of the Hillingdon Townscape Character Study (2023), the Site is identified within an 'Urban (Future) Height Zone', with a future Local Context Height above 15m. It therefore carries a Tall Building Threshold of 27m, meaning any building over 27m will be considered a 'tall building. It is located on the edge of the Hayes's Housing Zone, with Hayes (including the Site) identified as an Opportunity Area within the London Plan.

11.9 When considering the Site's appropriateness for higher density and tall building development, it is important to turn to strategic policy designations and site-specific considerations and context, including:

11.9.1 The strategic policy objective of London Plan Policy GG2 (Making the best use of land), which seeks to create successful sustainable mixed-use places, enabling the development of brownfield land, particularly in Opportunity Areas, including sites within and on the edge of town centres;

11.9.2 The policy objective of London Plan Policy SD1 (Opportunity Areas), which advises boroughs to support wider regeneration within Opportunity Areas and ensure that development proposals integrate into the surrounding area whilst supporting development which creates housing choice of Londoners;

11.9.3 The Sites location to the south of North Hyde Road (A437), Station Road and the Dawley Road roundabout, all forming important primary thoroughfares;

11.9.4 The existing character of the Site and it including buildings of between 4-5 commercial storeys;

11.9.5 The Site lacking any discernible physical landmark features or townscape qualities, formed of a collection of commercial uses with an inefficient use of land and relatively poor visual amenity;

11.9.6 The lack of designated and non-designated heritage assets within and surrounding the Site;

11.9.7 The number of sensitive receptors in the immediate area being limited;

11.9.8 The existing uses not according with the overarching residential context found across the wider area;

11.9.9 The Site's location relative to an emerging tall building context, including residential development (Keith House and Millington Road);

11.9.10 The Site's location on the edge of the Haye's Housing Zone and within the Hayes Opportunity Area;

11.9.11 The Site's location relative to Hayes and Hillingdon Railway Station, carrying a PTAL rating of 4; and

11.9.12 The existing uses being a general anomaly to the prevailing townscape, with a change of use to residential, tied to regenerative change, representing an opportunity for positive, transformative change.

THE PROPOSED DEVELOPMENT

11.10 The Proposed Development seeks to secure Outline Planning Permission for the regeneration of the Site, delivering new residential development, flexible commercial floorspace, new public realm, landscaping, new play space, car parking, cycle parking and associated works.

11.11 The Application is submitted in outline, with all matters (except access) reserved. It is supported by a suite of Parameter Plans, including the following parameters which will guide future proposals at a Reserved Matters Stage:

- Parameter Plan 1 – Building Zones
- Parameter Plan 2 – Access and Movement
- Parameter Plan 3 – Hard and Soft Landscape
- Parameter Plan 4 – Building Heights
- Parameter Plan 5 – Land Use
- Parameter Plan 6 – Trees

11.12 The Parameter Plans are supported by a Design Code, prepared by scheme architects TP Bennett, which set out design principles categorised as '*musts*' and '*shoulds*', that will form the basis for future detailed architectural designs at Reserved Matters.

HERITAGE IMPACT

- 11.13

The Site does not include any heritage (both designated or non-designated) assets, and it is not located within a conservation area. The existing buildings are not identified as holding any architectural or historic interest to warrant identification as a 'heritage asset', as defined by the Framework.
- 11.14

The closest listed building to the Site is the Grade II listed Enterprise House, situated within the Botwell, Thorn EMI Conservation Area, located to the north of the Great Western Railway Line and approximately 300m to the north of the Site.
- 11.15

The Botwell, Thorn Conservation Area comprises a collection of five locally listed buildings, including Apollo House, Neptune House, the Former HMV Offices/ Jupiter House, the Thorn/ EMI Building, and the HMV/ EMI Building.
- 11.16

The Site is not located within any wider and regional strategic views (including those identified in the London Views Management Framework), nor is it situated within any locally identified viewing corridor.
- 11.17

The Site, in its current form, makes no contribution to the significance of any heritage asset identified in the surrounding area, forming part of a wider urban townscape of a variety of commercial, industrial and residential uses. Sensitive heritage assets are largely situated to the north of the Site, within the Old Vinyl Factory/ EMI complex, where their significance is routed in the inherent interrelationships and group value, forming part of the former Gramophone and Typewriter Ltd company, later known as His Master's Voice ('HMV') and most recently 'EMI'. That association with the development and manufacturing of vinyl records contributes to the buildings' historic interests, while their form, character and scale are products of such historic uses.
- 11.18

The Proposed Development introduces new residential uses within the wider setting context of the identified listed building, conservation area and locally listed buildings within the EMI complex. The ZTV at **Section 2.0** illustrates visibility from within the conservation area will be reserved to glimpsed and peripheral visibility from Powerhouse Lane to the immediate south of the Grade II listed Enterprise House and to the immediate east of the Neptune House (locally listed).

- 11.19

Such visibility will be seen amongst a context of modern, residential regenerative development, which forms part of the heritage assets' immediate setting and has altered how each are experienced as part of a wider masterplan of modern built form. As such, this report has concluded that the Proposed Development will not give rise to any adverse setting effects to any of the identified built heritage assets, and rather will introduce new residential development that is consistent with the ongoing regeneration of the town centre. The improvement to the Site's appearance and character, including the introduction of architecture which will be informed by the Site's former and surrounding character (including references from the Site's historic industrial/ manufacturing uses), will improve the quality of built form in the wider and broader context of the identified heritage assets. In this regard, while not representing an enhancement to the significance of the identified assets, such improvements better the experience of the asset group more broadly.
- 11.20

In our professional opinion, the Proposed Development stands to preserve and cause no harm to the significance of any of the identified heritage assets within the immediate and surrounding area. Owing to such a finding (no harm), the policy test set out at Paras. 214-216 (NPPF) do not apply.
- 11.21

Equally, such a finding means the Proposed Development is consistent with Policy HC1 of the London Plan, in that the significance of the identified heritage assets are conserved, and Local Policies HE1, DMHB 1, DMHB 2, DMHB 3 and DMHB 4.

TOWNSCAPE IMPACT

- 11.22

The townscape assessment set out within this report has considered the Proposed Development within its urban setting context, including the buildings, the relationships between them, the different types of urban open spaces, including green spaces and the relationships between buildings and open spaces.
- 11.23

The assessment has identified six distinct townscape character areas, including the immediate industrial and commercial townscape of the Site and its immediate context, including an emerging townscape character of modern, residential development (TCA 1). The broader area surrounding the Site to the west, south and east includes swathes of low-scale residential (TCA 2), comprising development from across the early and mid-20th centuries.
- 11.24

Hayes town centre (TCA 4) is situated to the north-east of the Site, separated from the Site by the railway line of the Great Western Railway (TCA 6), while open space (TCA 5) is limited to recreational grounds, school playing fields and Stockley Park.
- 11.25

The Proposed Development is considered to introduce new uses that are either consistent with, or complementary to the emerging townscape character of the immediate townscape character in TCA 1, commensurate with the wider regenerative change seen across the town centre. It represents positive change, with residential-led development that will transform a Site with a coarse urban grain which lacks any coherence with the surrounding townscape character areas (including TCA 2) and introduce new and complementary uses to the area.
- 11.26

The proposals, as set out in the submitted Design Code and secured through the parameters across the suite of Parameter Plans, secure high quality architectural design, as well as a site-wide landscape and public realm strategy which will deliver substantial benefits to the Site in the context of the immediate and surrounding townscape. The increased permeability through the Site and the created of a new public green/ open space at the heart of the development will bring positive change to the immediate townscape, alongside better connectivity with the wider residential context and the town centre more broadly.

- 11.27
- The new use, architectural response and landscape design is considered to create a distinct sense of place, which builds on the emerging characteristics of the area. It will deliver positive change with uses that accord the surrounding context of residential uses and with improved architecture though contextual, high-quality development.
- 11.28
- Consequently, it is considered that the Proposed Development represents an improvement to the quality of the built environment and presents an opportunity to create a successful and sustainable neighbourhood. The site layout (secured through the suite of Parameter Plans including Building Zones, Access and Movement, and Hard and Soft Landscaping), coupled with the submitted Design Code, will enable the introduction of high quality architecture and urban design, informed by the area’s identify and townscape context. We therefore see the Proposed Development as complying with Strategic Policy BE1, as well as Policies DMHB 10, DMHB 11 and DMHB 12. In the context of DMHB 10 (High Buildings and Structures), it is considered that the height, form and massing of the Proposed Development is sensitive to and responds with the established and emerging townscape character, while the Design Code ensures the use of high-quality materials – accordingly with Policy DMHB 11 (Design of New Development). The improvements to public realm and the creation of new pedestrian routes complies with Policy DMHB 12 (Streets and Public Realm).

VISUAL IMPACT

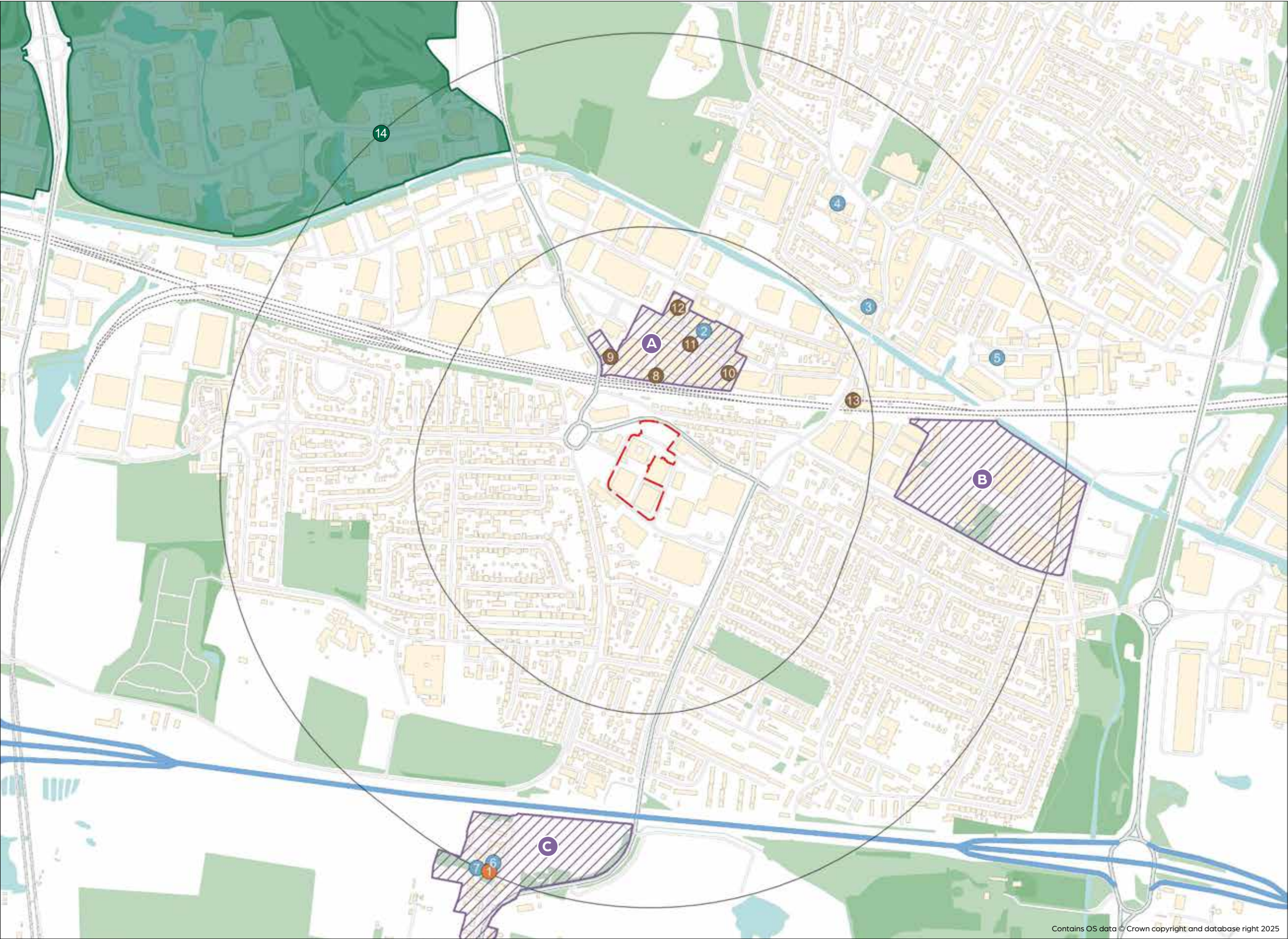
- 11.29
- The visual assessment has considered the impact of the Proposed Development upon visual receptors. The assessment relates to how people will be affected by changes in views and visual amenity at different places, including publicly accessible locations. Visual receptors are always people (although usually visual receptors are defined according to use e.g. residential, business, road, footpath etc.), rather than landscape features.
- 11.30
- During pre-application engagement with the London Borough of Hillingdon, 23 viewpoints were selected to support the assessment of the Proposed Development. The views represent the visual amenity experienced by visual receptors (people) and were informed by baseline analysis of the area, the context of the area, a review of policy and guidance documents, strategic viewing locations and discussions with Officers.
- 11.31
- Changes to visual amenity should not be judged in relation to static views (which are abstractions and not real) but in relation to the overall experience of an area and dependent upon the particular experiences and expectations of different receptors. The modelled viewpoints are often selected to show schemes at their maximum impact and not capture their typical impact in a receiving area or location. The impact assessment considers both the particular impact illustrated and the overall impact to come to a net assessment which more accurately reflects the overall experience than a single view.
- 11.32
- Within the wider area it is not considered that the Proposed Development represents a material change alter or impact the existing viewing experience. In fact, the change in land-use and the introduction of a varied skyline with buildings of a high architectural quality and proportions which are well proportioned and harmonious, coupled with a contextual material palette of brick and masonry (all secured through the submitted Design Code), will represent an improvement to the appearance of the Site in the context of regenerative change across the area.
- 11.33
- More locally, the Proposed Development would form a positive element of the townscape that would contribute to the overall character and enjoyment of the area, including improved connectivity, wayfinding and placemaking. It will introduce new active uses (including Class E to the ground floor of Blocks A1 or A2), with an overarching residential use that is commensurate with the overarching character of the wider area.

SUMMARY

- 11.34
- The Proposed Development has evolved through a considered design response. The design has benefited from pre-application engagement with the London Borough of Hillingdon, including input from planning, conservation and design officers.
- 11.35
- In conclusion, the Proposed Development is considered to represent a demonstrable improvement over the existing context, replacing an uninspired and dated commercial complex with residential-led regeneration, introducing new public open space, improved wayfinding, placemaking and improved architecture.
- 11.36
- The Proposed Development presents broader townscape and visual enhancements which will result in beneficial effects on immediate and broader character areas and will cause no harm to the significance of any heritage asset.
- 11.37
- We therefore judge that the Proposed Development is consistent with the Planning (Listed Buildings and Conservation Areas) Act 1990, in that the significance of all identified designated heritage assets will be preserved or enhanced. Owing to the finding of no harm to the significance of designated heritage assets, the policy test of Paras. 213–216 of the NPPF (2025) do not apply.
- 11.38
- We find that the Proposed Development is in full accordance with the policies set out in the adopted Development Plan concerning the historic environment and townscape / visual considerations.

APPENDIX 1: HERITAGE ASSETS, TOWNSCAPE ANALYSIS AND VIEWPOINT PLANS

HYDE PARK, HAYES, UB3 4AZ



HERITAGE ASSET PLAN

Application Site (indicative)

Conservation Areas

- A. Botwell, Thorn EMI CA
- B. Botwell, Nestles CA
- C. Harlington Village CA

Listed Buildings

Grade I

- 1. Church of St Peter and St Paul

Grade II

- 2. Enterprise House
- 3. Church of St Anselm, Hayes
- 4. Botwell House
- 5. Benlow Works
- 6. Walls to North of Church of Saint Peter and Saint Paul
- 7. Monument to William and Elizabeth Brookes in Churchyard of Church of St Peter and St Paul

Locally Listed Buildings

- 8. Thorn/EMI Building, Hayes (Botwell), Blyth Road, Hayes
- 9. HMV/EMI Building, Hayes (Botwell), Blyth Road, Hayes
- 10. Apollo House, 120 Blyth Road, Hayes
- 11. Neptune House, Blyth Road, Hayes
- 12. Former HMV offices/ Jupiter House, Blyth Road, Hayes
- 13. Hayes and Harlington Station, Station Road, Hayes

Registered Park and Gardens

- 14. Stockley Park: Business park Phases I and II, and country park and golf course (Grade II)

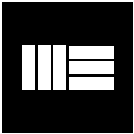
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Hyde Park, Hayes

DATE:
July 2025

SCALE:
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FIGURE:

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HERITAGE ASSET PLAN ZTV OVERLAY

Application Site (indicative)

Conservation Areas

- A. Botwell, Thorn EMI CA
- B. Botwell, Nestles CA
- C. Harlington Village CA

Listed Buildings

Grade I

- 1. Church of St Peter and St Paul

Grade II

- 2. Enterprise House
- 3. Church of St Anselm, Hayes
- 4. Botwell House
- 5. Benlow Works
- 6. Walls to North of Church of Saint Peter and Saint Paul
- 7. Monument to William and Elizabeth Brookes in Churchyard of Church of St Peter and St Paul

Locally Listed Buildings

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- 10. Apollo House, 120 Blyth Road, Hayes
- 11. Neptune House, Blyth Road, Hayes
- 12. Former HMV offices/ Jupiter House, Blyth Road, Hayes
- 13. Hayes and Harlington Station, Station Road, Hayes

Registered Park and Gardens

- 14. Stockley Park: Business park Phases I and II, and country park and golf course (Grade II)

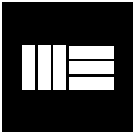
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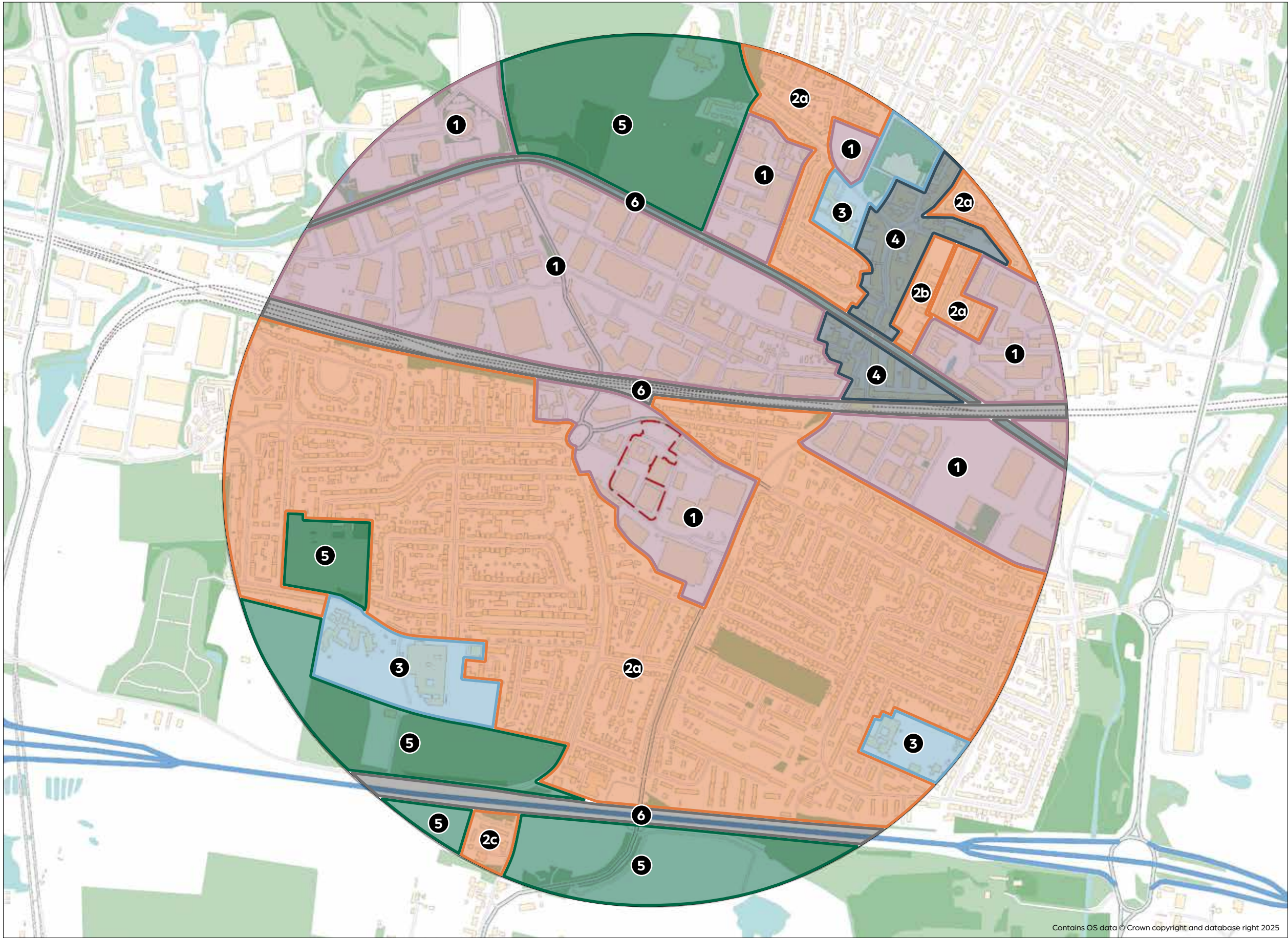
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TOWNSCAPE CHARACTER AREA PLAN

- Application Site (indicative)
1. TCA 1: Industrial / Commercial, with Emerging Residential
 - 2a. TCA 2a: Residential (Terraces, Metro-Land, Plotland, Garden City Estates)
 - 2b. TCA 2b: Residential (Apartments)
 - 2c. TCA 2c: Residential (Cul-de-Sac)
 3. TCA 3: Campus / School / Public Uses
 4. TCA4: Hayes Town Centre
 5. TCA 5: Open Space
 6. TCA 6: Travel Infrastructure

LOCATION:
Hyde Park, Hayes

DATE:
July 2025

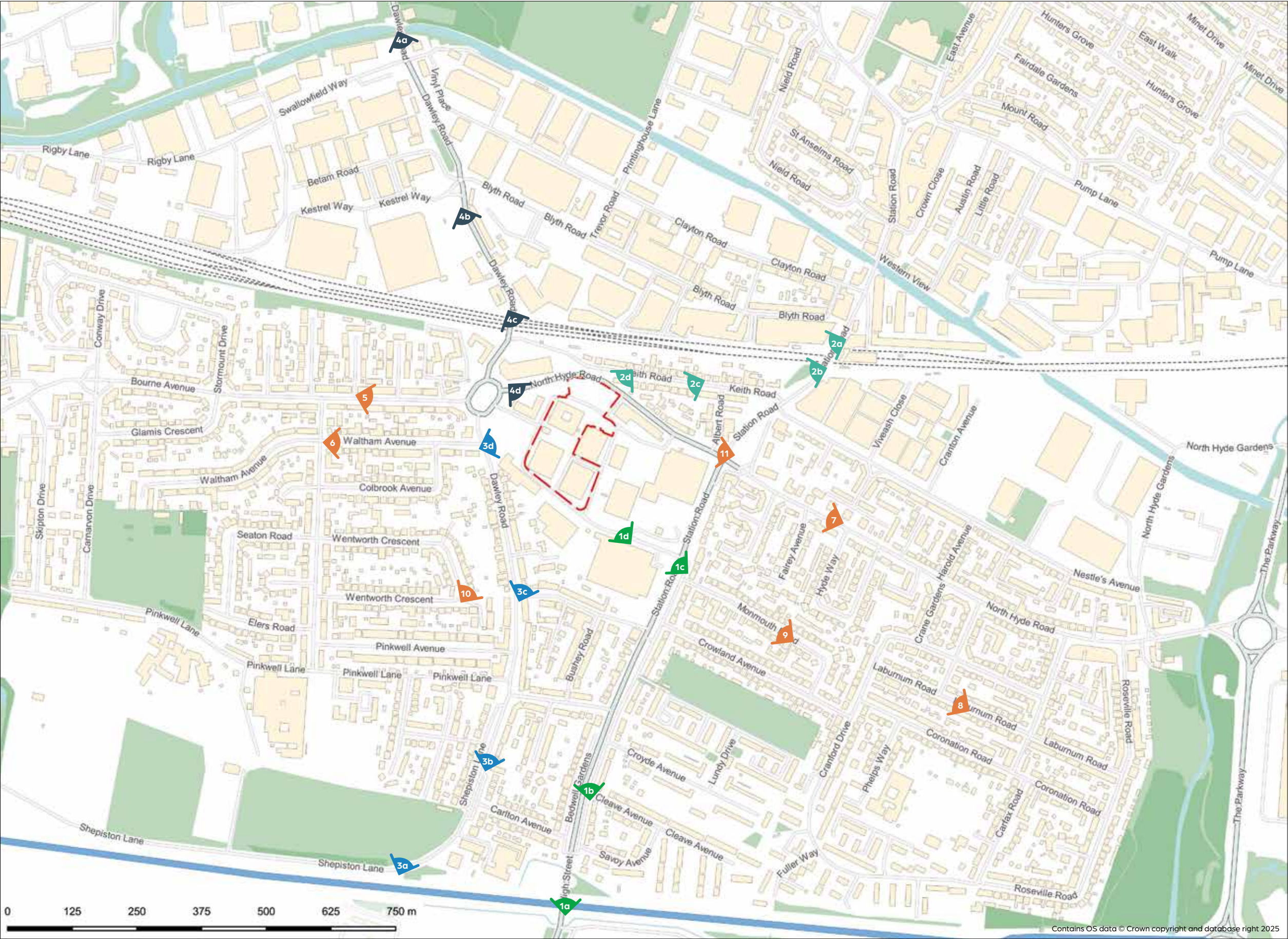
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**VIEWPOINT
LOCATION PLAN**

- Application Site (indicative)
- 1a. Harlington Bridge
 - 1b. High Street
 - 1c. Station Road
 - 1d. Millington Road
 - 2a. Hayes & Harlington Station
 - 2b. Station Road
 - 2c. Keith Road
 - 2d. Keith Road
 - 3a. Shepiston Lane
 - 3b. Shepiston Lane
 - 3c. Dawley Road
 - 3d. Dawley Road/ Waltham Avenue
 - 4a. Dawley Road at Grand Union Canal
 - 4b. Dawley Road
 - 4c. Dawley Road
 - 4d. Dawley Road
 - 5. Bourne Avenue
 - 6. Waltham Avenue
 - 7. North Hyde Road
 - 8. Laburnum Road
 - 9. Monmouth Road
 - 10. Wentworth Crescent/ Clifford Gardens
 - 11. North Hyde Road/ Station Road

LOCATION:
Hyde Park, Hayes

DATE:
July 2025

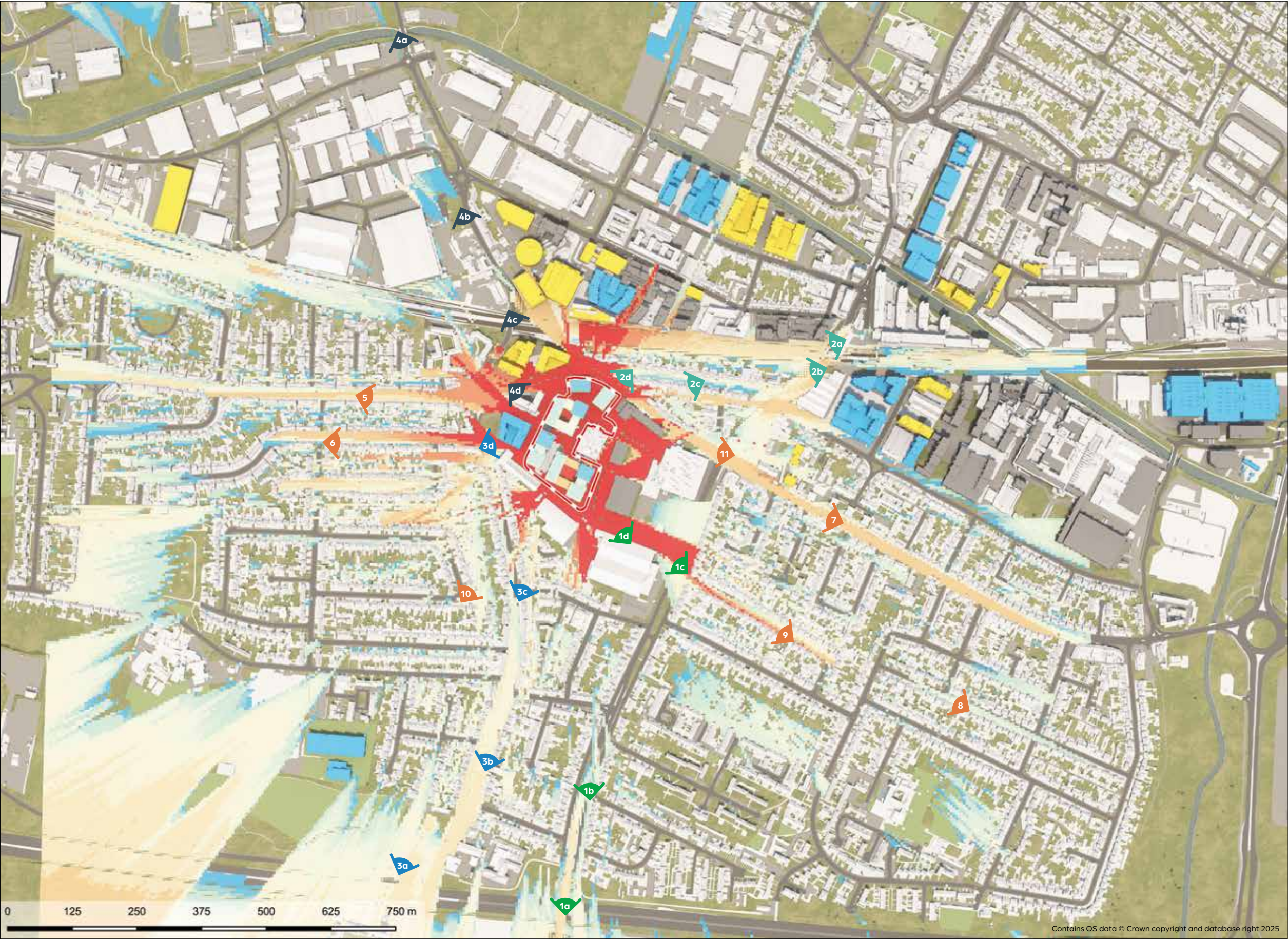
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FIGURE:

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**VIEWPOINT
LOCATION PLAN
ZTV OVERLAY**

- Application Site (indicative)
- 1a. Harlington Bridge
- 1b. High Street
- 1c. Station Road
- 1d. Millington Road
- 2a. Hayes & Harlington Station
- 2b. Station Road
- 2c. Keith Road
- 2d. Keith Road
- 3a. Shepiston Lane
- 3b. Shepiston Lane
- 3c. Dawley Road
- 3d. Dawley Road/ Waltham Avenue
- 4a. Dawley Road at Grand Union Canal
- 4b. Dawley Road
- 4c. Dawley Road
- 4d. Dawley Road
- 5. Bourne Avenue
- 6. Waltham Avenue
- 7. North Hyde Road
- 8. Laburnum Road
- 9. Monmouth Road
- 10. Wentworth Crescent/ Clifford Gardens
- 11. North Hyde Road/ Station Road

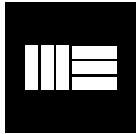
LOCATION:
Hyde Park, Hayes

DATE:
July 2025

SCALE:
1:7,500 @ A3

FIGURE:

▲ NORTH



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APPENDIX 2: ACCURATE VISUAL REPRESENTATIONS METHODOLOGY PREPARED BY AVR

HYDE PARK, HAYES, UB3 4AZ



L O N D O N

PROJECT: Hyde Park, Hayes
DATE: July 2025

AVR London were commissioned to produce a number of verified views of the proposal at Hyde Park Hayes. AVR positions were identified by the planning consultant.

2D plans, Ordnance Survey Mapping, local survey data, and the 3D model for the proposed development were provided by the architect.

PHOTOGRAPHY

Equipment:

Canon EOS R5
Canon TS-E 24mm f/3.5L II

1.1 All photography is undertaken by AVR London's in-house professional photographers.

1.2 In professional architectural photography, having the camera level with the horizon is desirable in order to prevent three point perspective being introduced to the image and to ensure the verticals within the photographed scene remain parallel. This is standard practice and more realistically reflects the viewing experience.

1.3 The lens used by the photographer has the ability, where necessary, to shift up or down while remaining parallel to the sensor, allowing for the horizon in the image to be above, below or central within the image whilst maintaining two point perspective. This allows the photographer to capture the top of a taller proposed development which would usually be cropped, without introducing three point perspective.

When the shift capability of the lens is not used the image FOV and dimensions are the same as a prime lens of equal focal length.

1.4 Once the view positions are confirmed by the

townscape consultant, AVR London takes professional photography from each location. At each location the camera is set up over a defined ground point using a plumb line to ensure the position can be identified later.

1.5 The centre of the camera lens is positioned at a height of 1.60 metres above the ground to simulate average viewing height. For standard verified photography, each view is taken with a lens that gives a 68 degree field of view, approximately, a standard which has emerged for verified architectural photography. The nature of digital photography means that a record of the time and date of each photograph is embedded within the photo file; this metadata allows accurate lighting timings to be recreated within the computer model.

1.6 Once the image is taken, the photographer records the tripod location by photographing it in position to ensure the position can be accurately located for surveying (Fig 02).

1.7 Each image is processed by the photographer to ensure it visually matches the conditions on site when the photograph is taken.

REGARDING 24mm FOCAL LENGTH IN AN URBAN ENVIRONMENT

1.8 The Landscape Institute Technical Guidance Note [2] states:

1.5.5 'When regulatory authorities specify their own photographic and photomontage requirements, the landscape professional should follow them unless there is a good reason not to do so.'

1.9 The London View Management Framework: Supplementary Planning Guidance (2012) Appendix C: Accurate Visual Representation [1] sets out a well-defined and verifiable procedure for preparing Accurate Visual Representations as part of the assessment of the visual impacts of proposed developments. As the LVMF aims to protect the most significant views in London, the guidance set out in Appendix C is considered best practice within the industry.

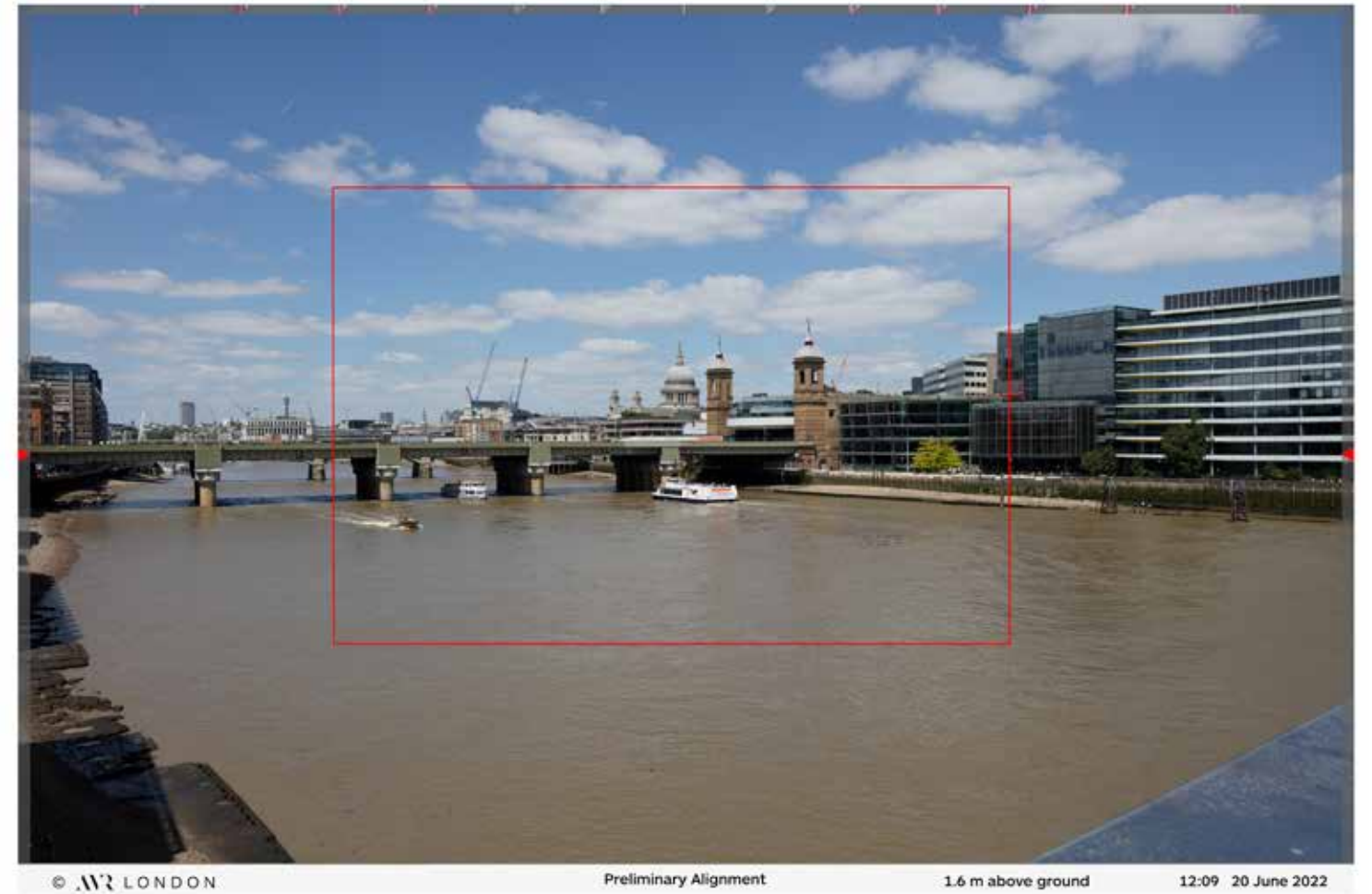


Fig 01: 24mm photograph with 50mm photograph overlaid

The LVMF guidance indicates that creators of AVRs should use the appropriate lens for each study, which could include wide angle lenses (wider than 50mm) or telephoto lenses (more zoomed than 50mm), where necessary.

Over time the 24mm lens has become the industry standard in urban visualisation due to its ability to capture context with limited distortion.

Given the Landscape Institute's advice to follow the authorities' own requirements, where applicable, AVR London follows the LVMF guidance.

1.10 When we observe a scene, we can focus on 6-10 degrees. However, without moving our head, the scene

beyond is observed using our peripheral vision. Once we move our eyes we can observe almost 180 degrees without moving our head. In reality we do not view the world through one fixed position, we move our eyes around a scene and observe, height, width and depth.

1.11 This is acknowledged by the Landscape Institute's Technical Guidance Note [2]. The appreciation of the wider context seen through peripheral vision or by moving our eyes (changing the focal point) is key to our experience of a scene.

While photography cannot replicate the human experience entirely, it is widely acknowledged that the use of a 24mm lens in an urban environment provides the viewer with a more realistic experience

than a 50mm lens. For these reasons the 24mm lens is industry standard in the creation of urban photo montages. It should also be noted that using a consistent focal length is favourable so as not to confuse the viewer's sense of scale.

50mm LENS/CROP

1.12 It should also be stressed that if you were to centrally crop into an image taken with a 24mm lens to the same HFOV (Horizontal Field Of View) as a 50mm lens, the resulting image is identical to that produced by taking it directly with a 50mm lens. An image with a 70 degree HFOV (24mm lens) is geometrically and perspectively identical to an image showing a HFOV of 40 degrees (50mm lens), the 24mm lens purely gives more context to all sides (Fig 01). Further, all of our images allow this 50mm equivalent HFOV to be seen, read and understood on the image itself.

The benefit of using images taken with a 24mm lens is that the observer and in particular an experienced inspector, is able to analyse the image with the benefit of both fields of view.

POINT	EASTING	NORTHING	HEIGHT
AVR01	509187.074	178357.860	32.730
A101	509187.128	178362.339	33.307
A102	509185.515	178364.937	32.601
A103	509177.362	178388.820	37.217
A104	509177.374	178388.825	34.662
A105	509180.219	178408.364	37.089
A106	509186.197	178450.851	40.240
A107	509152.381	179182.115	51.941
A108	509214.396	178582.964	31.981
A109	509196.014	178424.851	35.541
A110	509196.992	178398.871	39.857
A111	509189.464	178364.854	37.299

Table 1: Example surveying data



Fig 04: Example AVR London graticule



Fig 02: Tripod location as documented by photographer

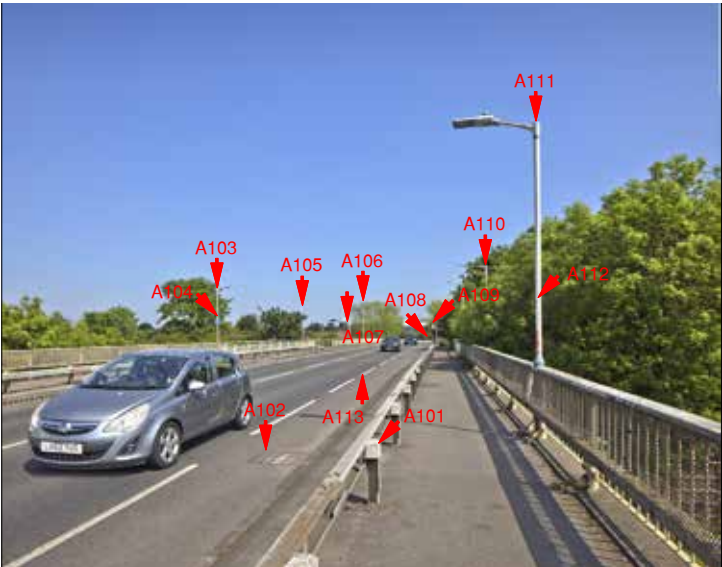


Fig 03: Survey points as highlighted by surveyor

SURVEY

Equipment:

- Leica Total Station Electronic Theodolite which has 1" angle measuring accuracy and 2mm + 2ppm distance accuracy.
- Leica Smart Rover RTK Global Positioning System.
- Wild/Leica NAK2 automatic level which a standard deviation of +/- 0.7mm/km

- 2.1 The photographer briefs the surveyor, sending across the prepared photographs, ground positions and appropriate data.
- 2.2 The surveyor establishes a line of sight, two station baseline, coordinated and levelled by real time kinetic

- GPS observations, usually with one of the stations being the camera location. The eastings and northings are aligned to the Ordnance Survey National Grid (OSGB36) and elevation to Ordnance Survey Datum (OSD) using the OSTN15 GPS transformation program.
- 2.3 Once the baseline is established, a bearing is determined and a series of clearly identifiable static points across the photograph are observed using the total station. These observations are taken throughout the depth of field of the photograph and at differing heights within the image.
- 2.4 The survey control stations are extracted from the OS base mapping and wherever possible, linked together to form a survey network. This means that survey information is accurate to

tolerances quoted by GPS survey methods in plan and commensurate with this in level.

2.5 Horizontal and vertical angle observations from the control stations allow the previously identified points within the view to be surveyed using line of sight surveying and the accurate coordination of these points determined using an intersection program. These points are then related back to the Ordnance Survey grid and provided in a spreadsheet format showing point number, easting, northing and level of each point surveyed, together with a reference file showing each marked up image (Fig 03 and Table 1).

2.6 The required horizon line within the image is established using the horizontal collimation of the theodolite (set to approximately above the ground) to identify 3 or 4 features that fall along the horizon line. The theodolite more generally is used for measuring angles and distances.

2.7 Using the surveyed horizon points as a guide, each photograph is checked and rotated, if necessary, in proprietary digital image manipulation software to ensure that the horizon line on the photograph is level and consistent with the information received from the surveyor.

Accurate Visual Representation Production

Process

3.1 The 3D computer model is precisely aligned to a site plan on the OS coordinate grid system.

3.2 Within the 3D software a virtual camera is set up using the coordinates provided by the surveyor along with the previously identified points within the scene. The virtual camera is verified by matching the contextual surveyed points with matching points within the overlaid photograph. As the surveyed data points, virtual camera and 3D model all relate to the same 3-dimensional coordinate system, there is only one position, viewing direction and field of view where all these points coincide with the actual photograph from site. The virtual camera is now verified against

the site photograph.

3.3 For fully-rendered views a lighting simulation (using accurate latitude, longitude and time) is established within the proprietary 3D modelling software matching that of the actual site photograph. Along with the virtual sunlight, virtual materials are applied to the 3D model to match those advised by the architects. The proprietary 3D modelling software then uses the verified virtual camera, 3D digital model, lighting and material setup to produce a computer generated render of the proposed building.

3.4 The proposal is masked where it is obscured behind built form or street furniture.

3.5 Using the surveyed information and verification process described above, the scale and position of a proposal within a scene can be objectively calculated. However, using the proprietary software currently available the exact response of proposed materials to their environment is subjective so the exact portrayal of a proposal is a collaboration between illustrator and architect. The final computer generated image of the proposed building is achieved by combining the computer-generated render and the site photography within proprietary digital compositing software.

Presentation

Graticule

4.1 Each Accurate Visual Representation is framed by a graticule which provides further information including time and date of photography, horizon markers and field of view of the lens (Fig 04).

4.2 The Field of View is represented along the top of the image in the form of markers with degrees written at the correct intervals.

4.3 The horizon markers indicate where the horizontal plane of view from the camera lies. (section 2 above explains how the surveyor establishes these horizon points).

4.4 The date and time stamp documents exactly when the photograph was taken. This data is recorded in every digital camera file, known as EXIF data.

6. PUBLISHED GUIDANCE

6.1 The Landscape Institute, states in “Visual Representation of Development Proposals - Technical Guidance Note (September 2019)”, that:

“The LI recognises that, for some types of development, targeted or authority-specific guidance may be appropriate.”

“The London View Management Framework provides useful guidance for large-scale urban development, and is particularly useful in identifying what it refers to as ‘AVR Types’ (0 - 3)”

6.2 We agree with the Landscape Institute and it is broadly accepted across the industry that the London View Management Framework Guidance, Appendix C: Accurate Visual Representations outlines best practice for producing Accurate Visual Representations of urban developments.

The framework was set up to protect London’s most important views and has been used as the industry standard for all significant strategic developments in the capital since. The LVMF Guidance was the subject of full consultation with the local authorities in London and other bodies such as Historic England and Historic Royal Palaces.

The following, outlines the key reasons why LVMF guidelines for urban development are recommended:

Field of View (FOV) and Lens Selection

6.3 It is outlined in the guidance (Point 467) “As we experience a scene, our perception is built from a sophisticated visual process that allows us to focus onto individual areas with remarkable clarity whilst remaining aware of a wider overall context.” For this reason a 50mm lens with a FOV of 40 degrees is not appropriate in a built environment. In comparison a 24mm lens with a FOV of 70 degrees allows the viewer

to appreciate and understand urban context.

Tilt/Shift Lens

6.4 A tilt/shift lens allows the axis of the lens to be moved vertically or horizontally in order to avoid distortion and thus to replicate more closely the complex manner in which human vision is interpreted into an image in our mind.

Due to the complex nature of these lenses, they are of a much higher quality and cost compared to standard lenses and do not have any distortion, barreling/pin cushion effect that lenses of a lesser quality often have. Despite their complexity and cost, the ability to control the viewing centre of an image without any distortion has made these lenses essential to professional photographers, especially in the discipline of architecture in urban environments.

It should be stressed that AVR London only use the shift function of the lens and this is only shifted in the vertical direction. This is simply to allow us to compose images to better demonstrate the view and the proposal’s place within it without introducing 3-point perspective distortion (converging verticals) and to closer replicate how our mind interprets and corrects for such (Fig 04).

Not only is the use of tilt shift lenses standard practice within architectural photography, it is also standard practice throughout all the established professional practices conducting verified images in London. The LVMF guidance itself uses a vertical rise image as its main image of explanation in the Annex identifying good practice (Fig 05).

50mm Lens/Crop

6.5 It should also be stressed that if you were to centrally crop into an image taken with a 24mm lens to the same HFOV as a 50mm lens, the resulting image is identical to that produced by taking it directly with a 50mm lens. This is often misunderstood. An image with a 70 degree HFOV (24mm lens) is geometrically and perspectively identical to an image showing a HFOV of 40 degrees (50mm lens), the 24mm lens purely gives

more context to all sides (Fig 06). Further, all of our images allow this 50mm equivalent HFOV to be seen, read and understood on the image itself. The reader and in particular an experienced inspector can then make a judgment with the benefit of both fields of view.

Stitching and Accuracy

6.6 A 24mm lens captures enough context that it almost always possible to use one photograph to capture a view position. This ensures stitching of multiple images will not be required, on the rare occasion that 24mm FOV is not wide enough a diptych or triptych is preferable, again this is to avoid stitching of images together.

Stitching images together introduces inaccuracies and distortion in to the photograph and leads to a composite of blended perspectives.

It is always more accurate to verify a single photograph compared to a stitched image. Stitched images are impossible to replicate using the same methodology compared with single photographs as the stitching is either done by hand with causes variation or by automated programs which may also introduce variation.

Proven History

6.7 AVR London has used this methodology, aligned with the London View Management Framework, for planning applications in every London borough, throughout the UK from Cornwall to Scotland and Northern Ireland and as far afield as Sydney, Australia without question.

AVR London have also presented work using this methodology at numerous planning inquiries without question.

Research and Future Developments

6.8 AVR London have always undertaken research in to new areas of technology within the industry and this includes within the verified workflow. Given the previous stated issues surrounding stitched

photography we have worked on various research projects and developed a separate methodology to ensure 360 degree photography can be fully verified and viewed within a headset where appropriate. This accuracy has been tested and proven at planning inquiry.

Notes:

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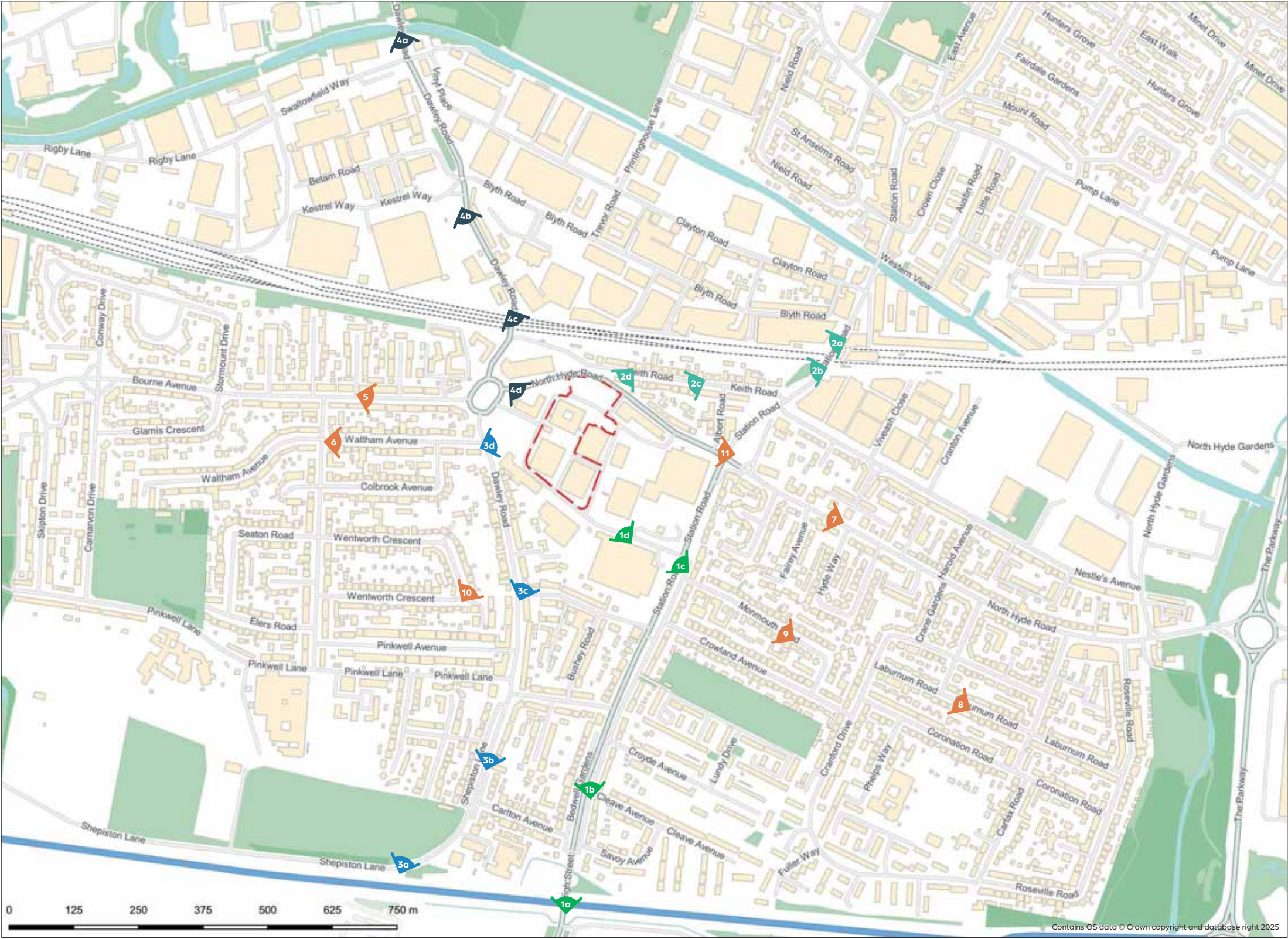
AVR London
6 David Mews
Greenwich, SE10 8NJ

APPENDIX 3: ACCURATE VISUAL REPRESENTATIONS PREPARED BY AVR

HYDE PARK, HAYES, UB3 4AZ



L O N D O N



VIEWPOINT
LOCATION PLAN

- Application Site (indicative)
- 1a. Harlington Bridge
- 1b. High Street
- 1c. Station Road
- 1d. Millington Road
- 2a. Hayes & Harlington Station
- 2b. Station Road
- 2c. Keith Road
- 2d. Keith Road
- 3a. Shepiston Lane
- 3b. Shepiston Lane
- 3c. Dawley Road
- 3d. Dawley Road/ Waltham Avenue
- 4a. Dawley Road at Grand Union Canal
- 4b. Dawley Road
- 4c. Dawley Road
- 4d. Dawley Road
- 5. Bourne Avenue
- 6. Waltham Avenue
- 7. North Hyde Road
- 8. Laburnum Road
- 9. Monmouth Road
- 10. Wentworth Crescent/ Clifford Gardens
- 11. North Hyde Road/ Station Road

LOCATION:
Hyde Park, Hayes

DATE:
January 2025

SCALE:
1:7,500 @ A3

FIGURE:

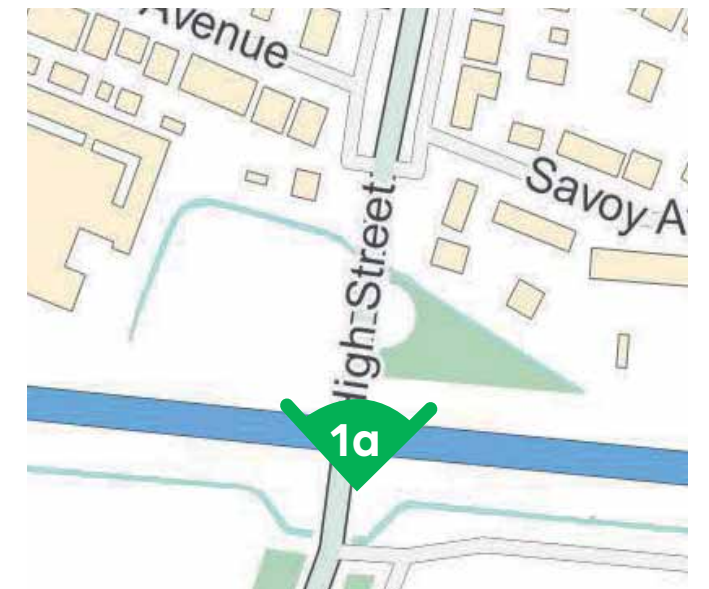
▲ NORTH



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Hyde Park
Hayes
July 2025



View 1A_ Harlington Bridge

Hyde Park
Hayes
July 2025



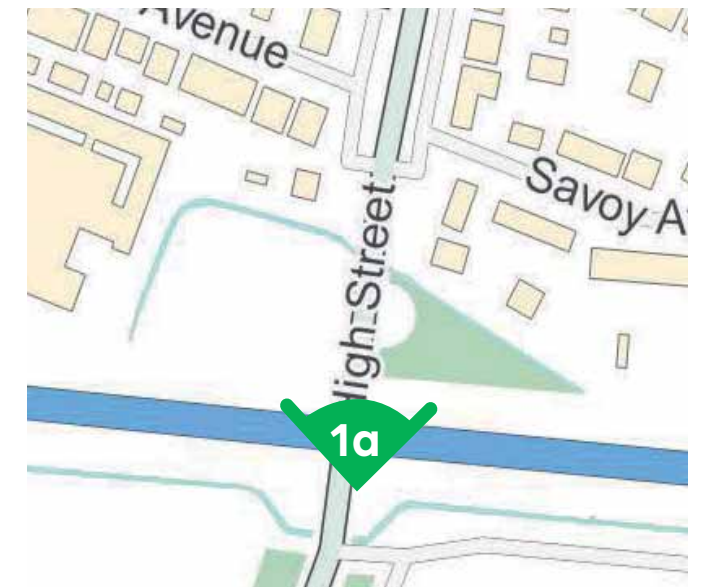
View 1A_ Harlington Bridge



Hyde Park
Hayes
July 2025

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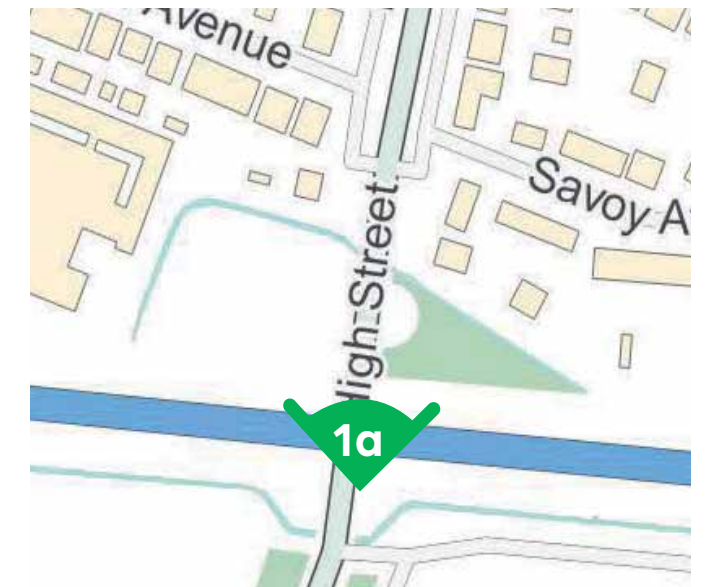


View 1A_ Harlington Bridge

Hyde Park
Hayes
July 2025

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— = Additional Plant Area



View 1A_ Harlington Bridge

Hyde Park
Hayes
July 2025



View 1B_ High Street

Hyde Park
Hayes
July 2025

— = Max Parameter

— = Additional Plant Area



View 1B_ High Street



Hyde Park
Hayes
July 2025

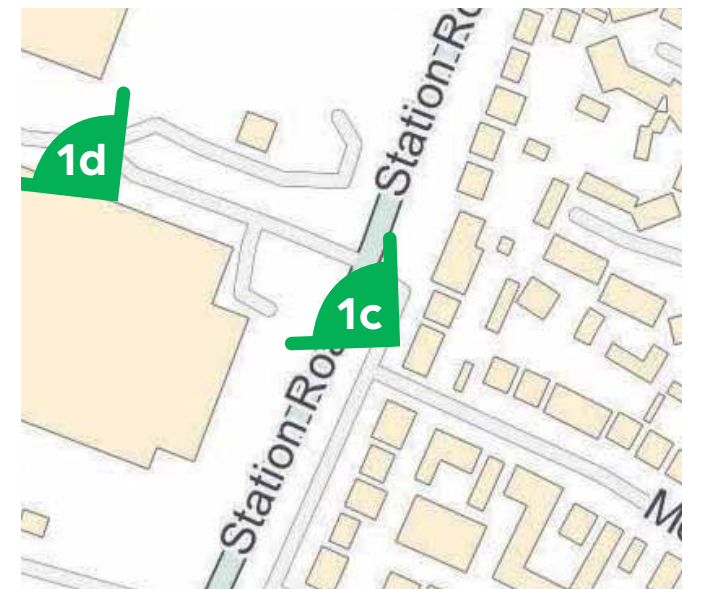
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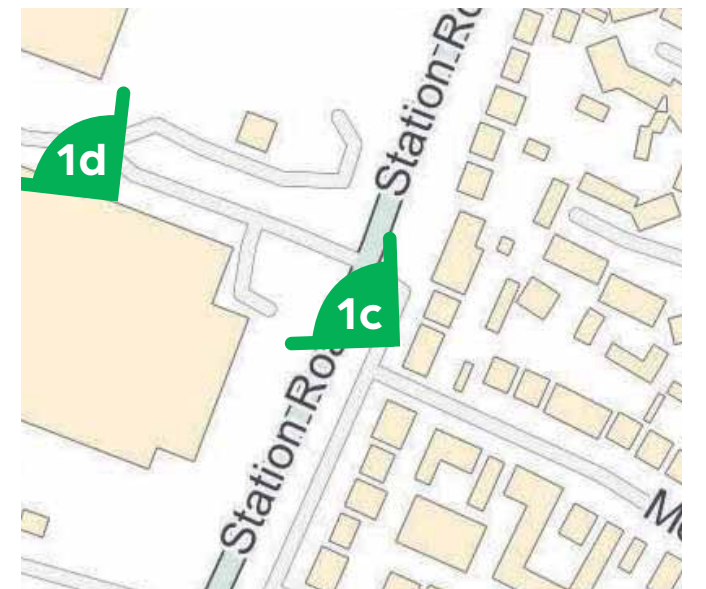
View 1B_ High Street

Hyde Park
Hayes
July 2025



View 1C_ Station Road

Hyde Park
Hayes
July 2025

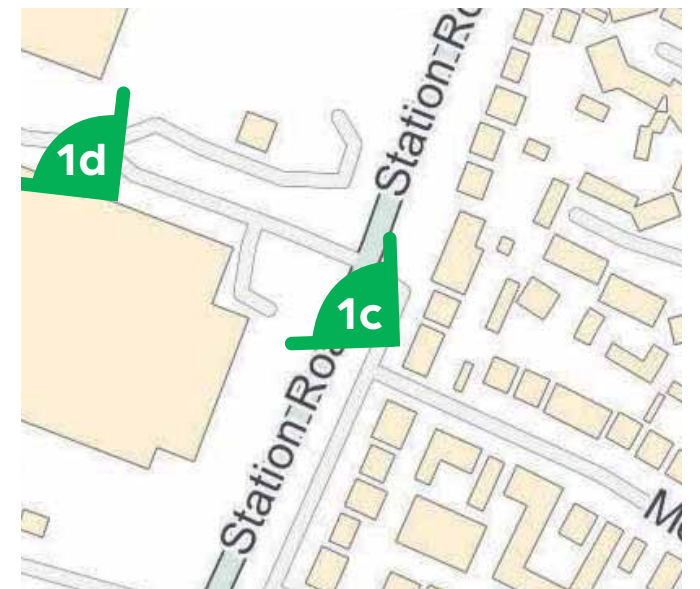


View 1C_ Station Road

Hyde Park
Hayes
July 2025

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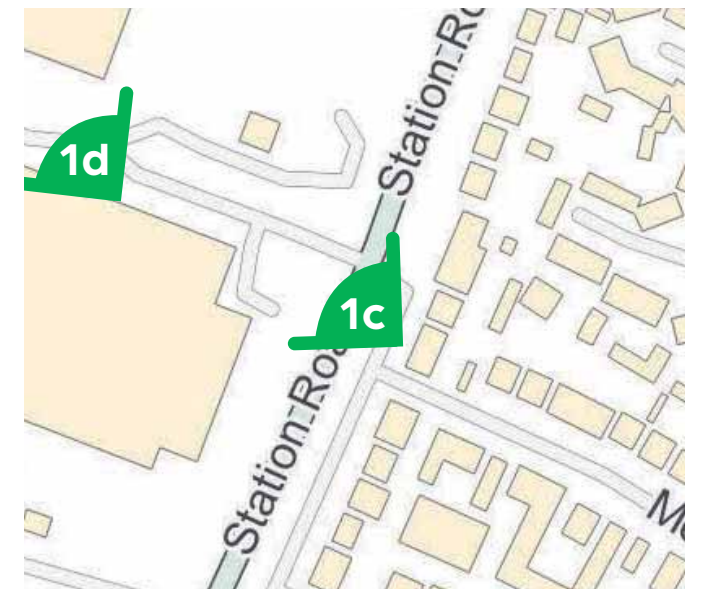
View 1C_ Station Road



Hyde Park
Hayes
July 2025

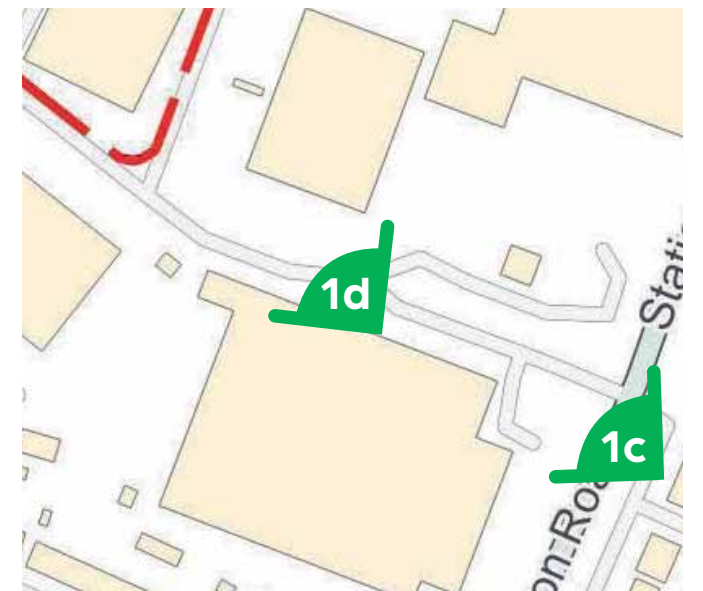
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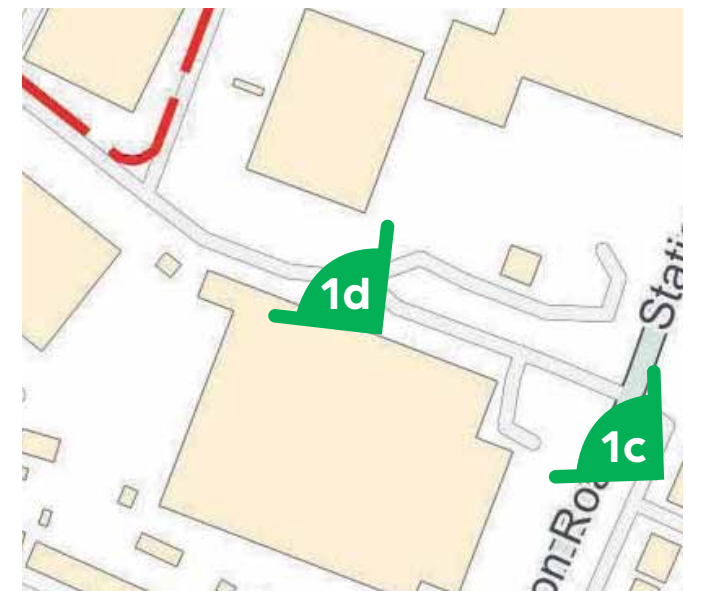
View 1C_ Station Road

Hyde Park
Hayes
July 2025



View 1D_ Millington Road

Hyde Park
Hayes
July 2025

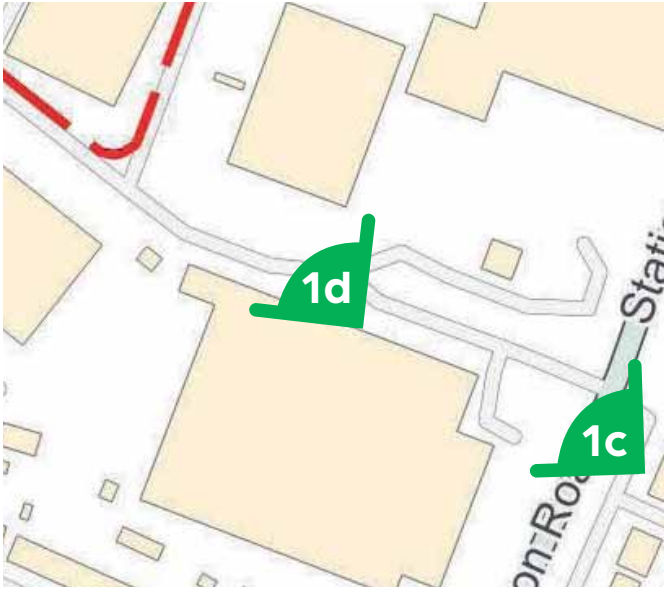


View 1D_ Millington Road



Hyde Park
Hayes
July 2025

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- = Additional Plant Area

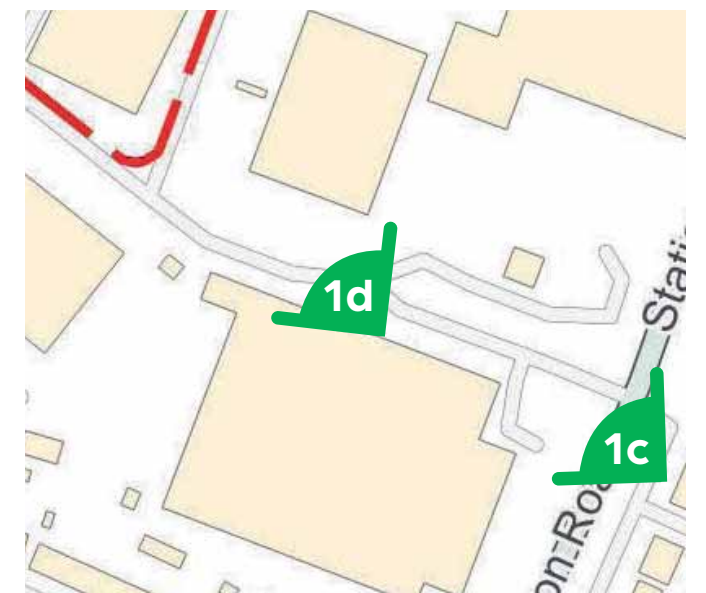


View 1D_ Millington Road

Hyde Park
Hayes
July 2025

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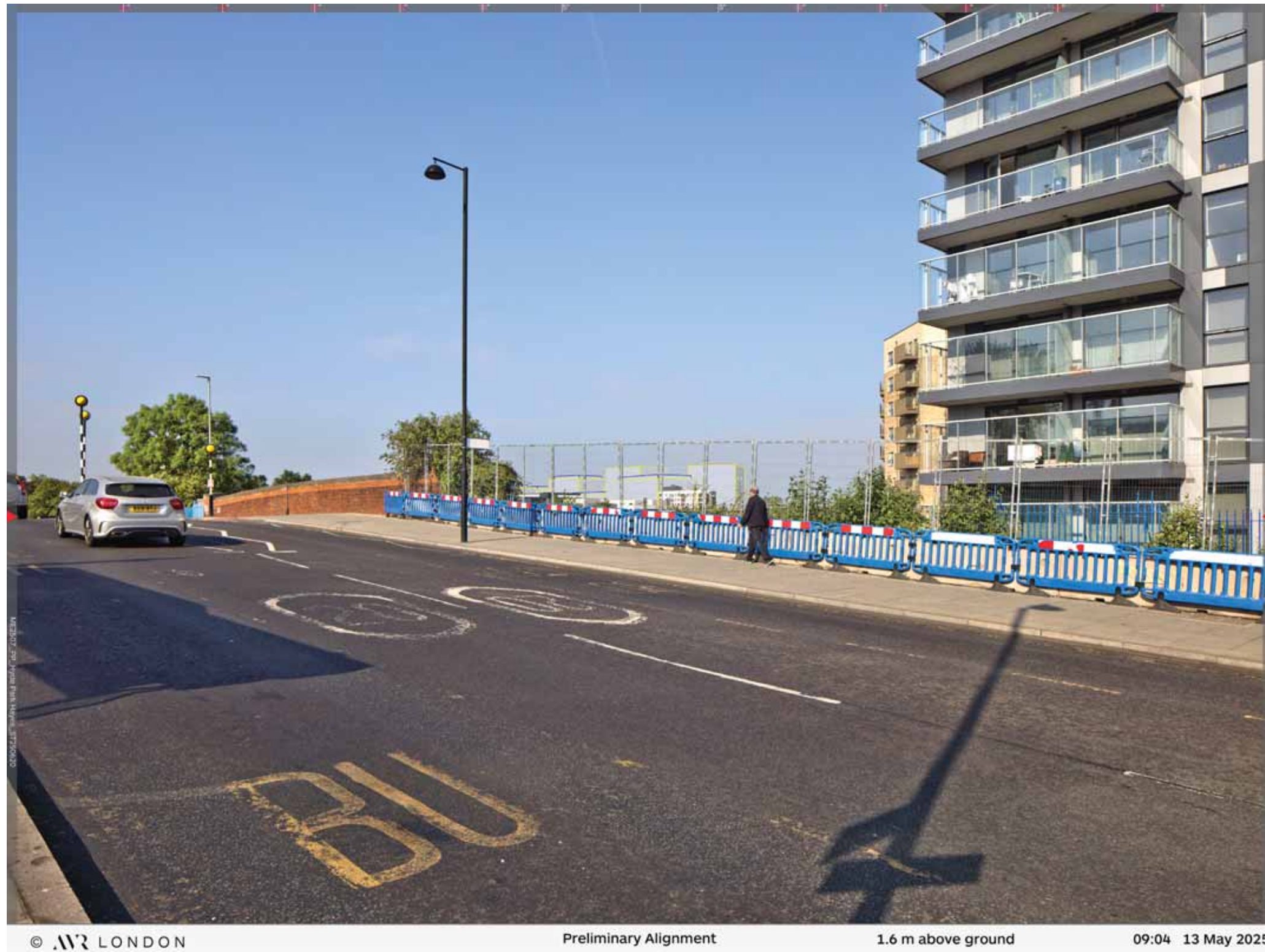
View 1D_ Millington Road



Hyde Park
Hayes
July 2025



View 2A_ Hayes & Harlington Station



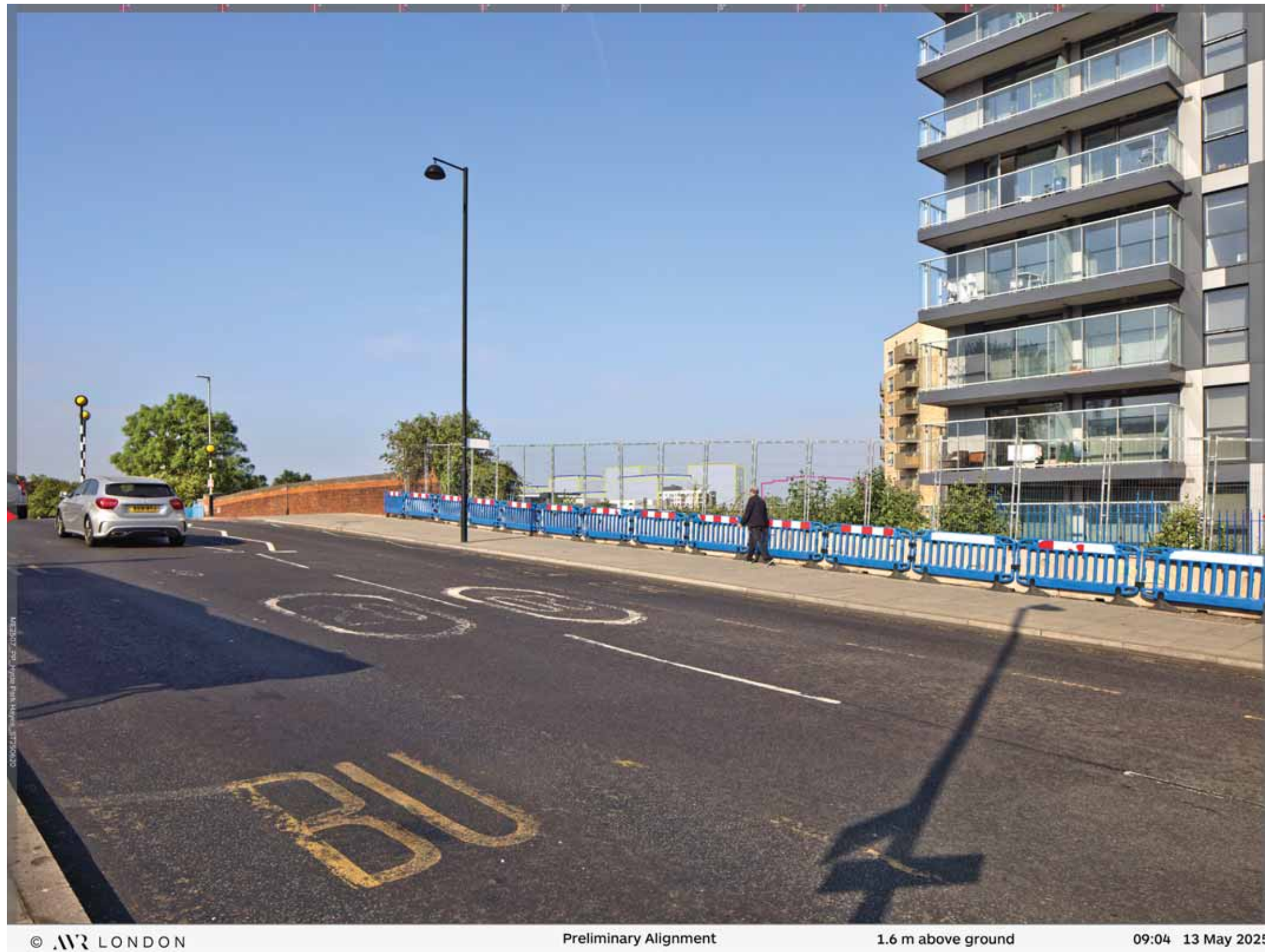
Hyde Park
Hayes
July 2025

— = Max Parameter

— = Additional Plant Area



View 2A_ Hayes & Harlington Station



Hyde Park
Hayes
July 2025

— = Max Paramiter

— = Additional Plant Area



View 2A_ Hayes & Harlington Station

Hyde Park
Hayes
July 2025



View 2B_ Station Road

Hyde Park
Hayes
July 2025

— = Max Paramiter

— = Additional Plant Area



View 2B_ Station Road

Hyde Park
Hayes
July 2025

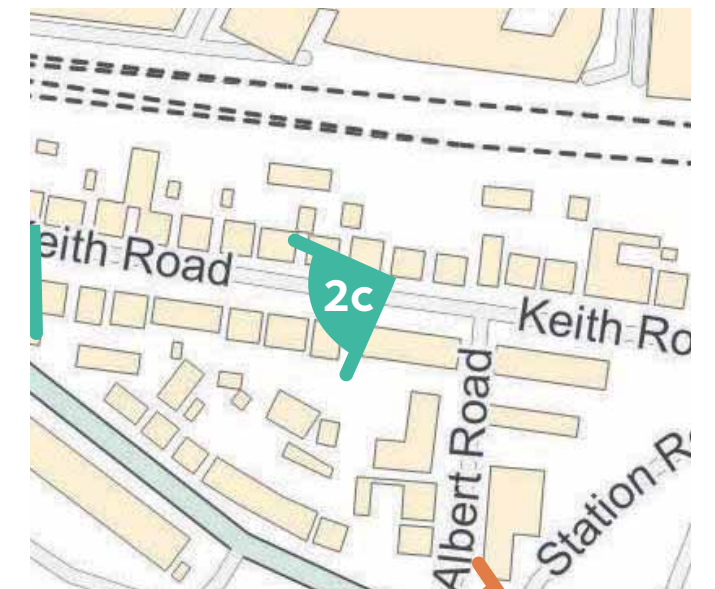
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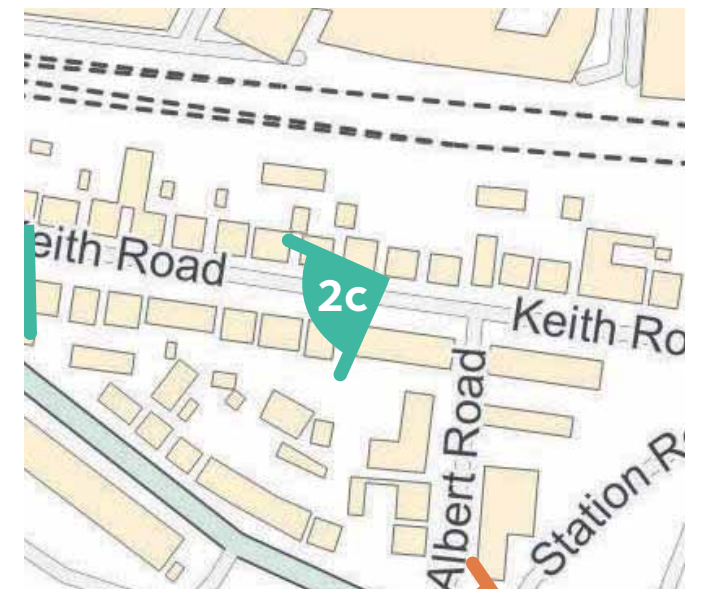
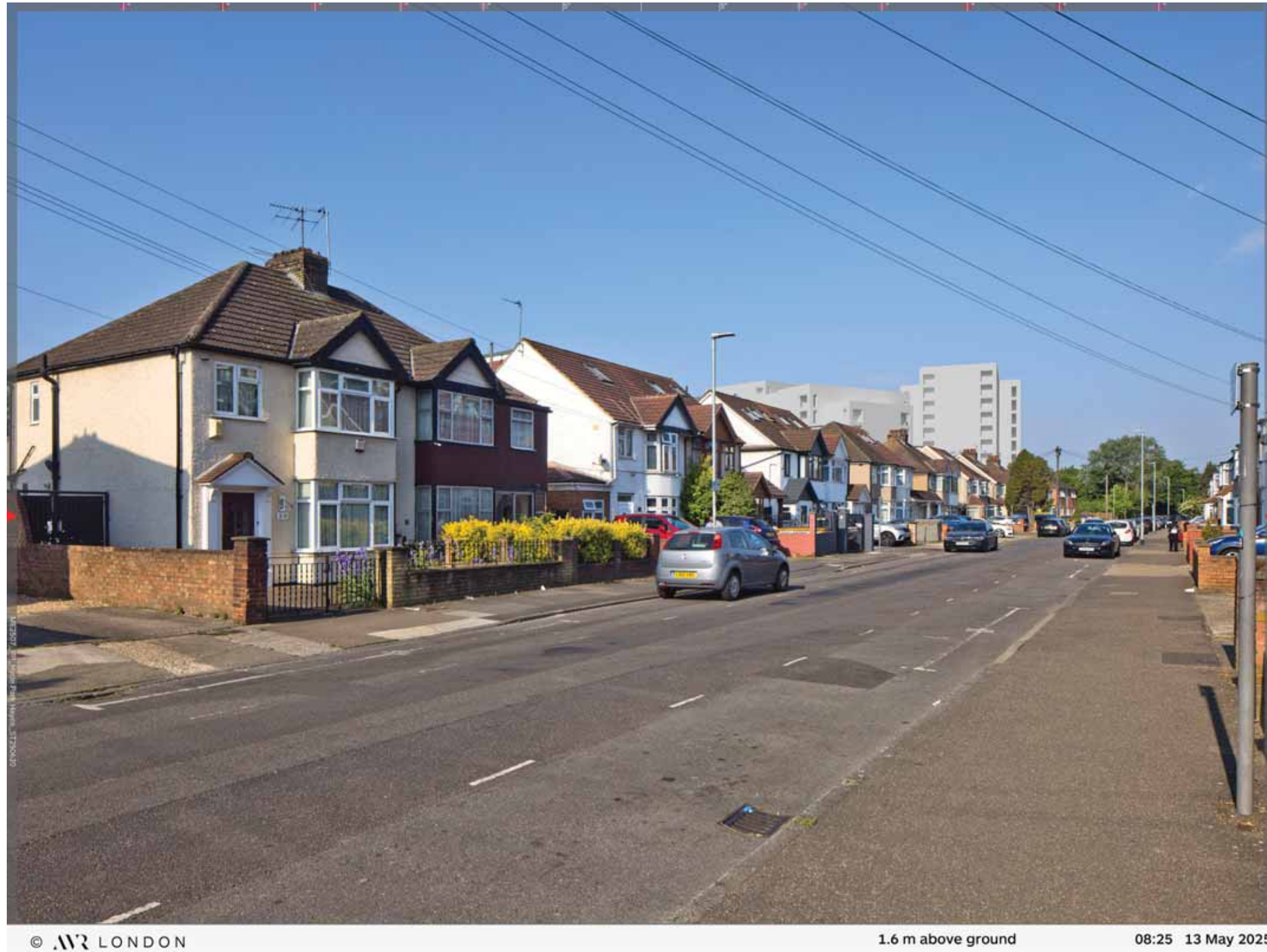
View 2B_ Station Road

Hyde Park
Hayes
July 2025



View 2C_ Keith Road

Hyde Park
Hayes
July 2025

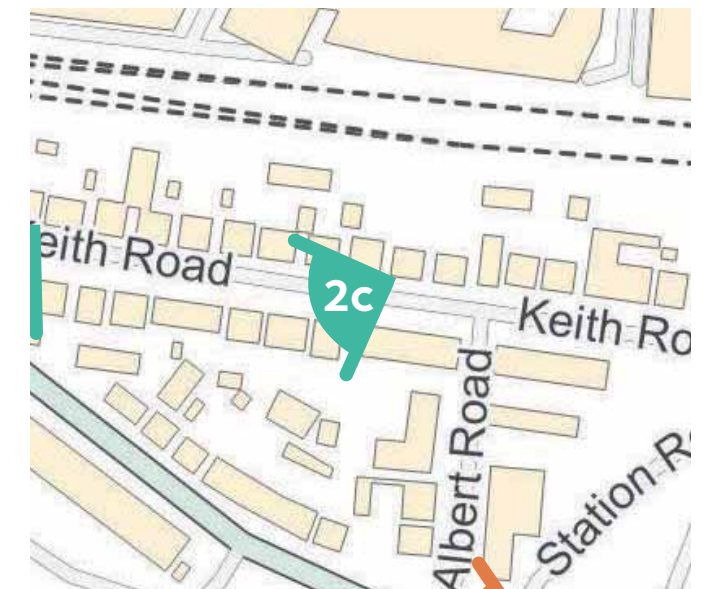


View 2C_ Keith Road

Hyde Park
Hayes
July 2025

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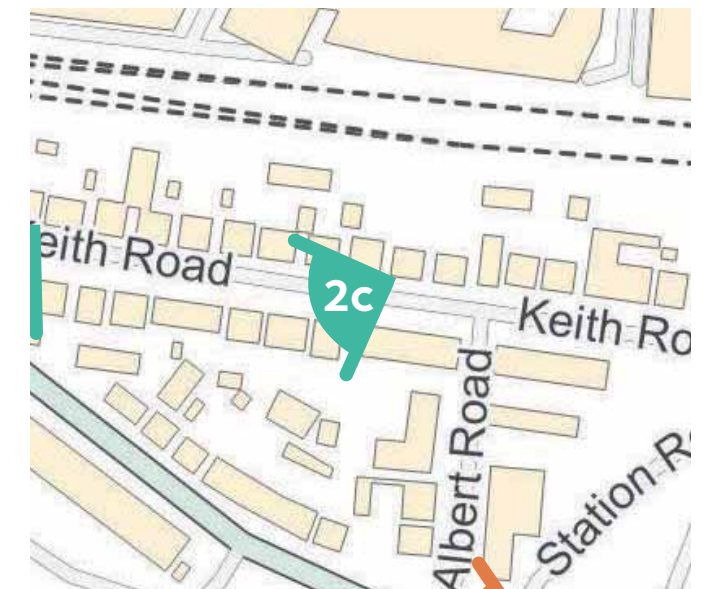
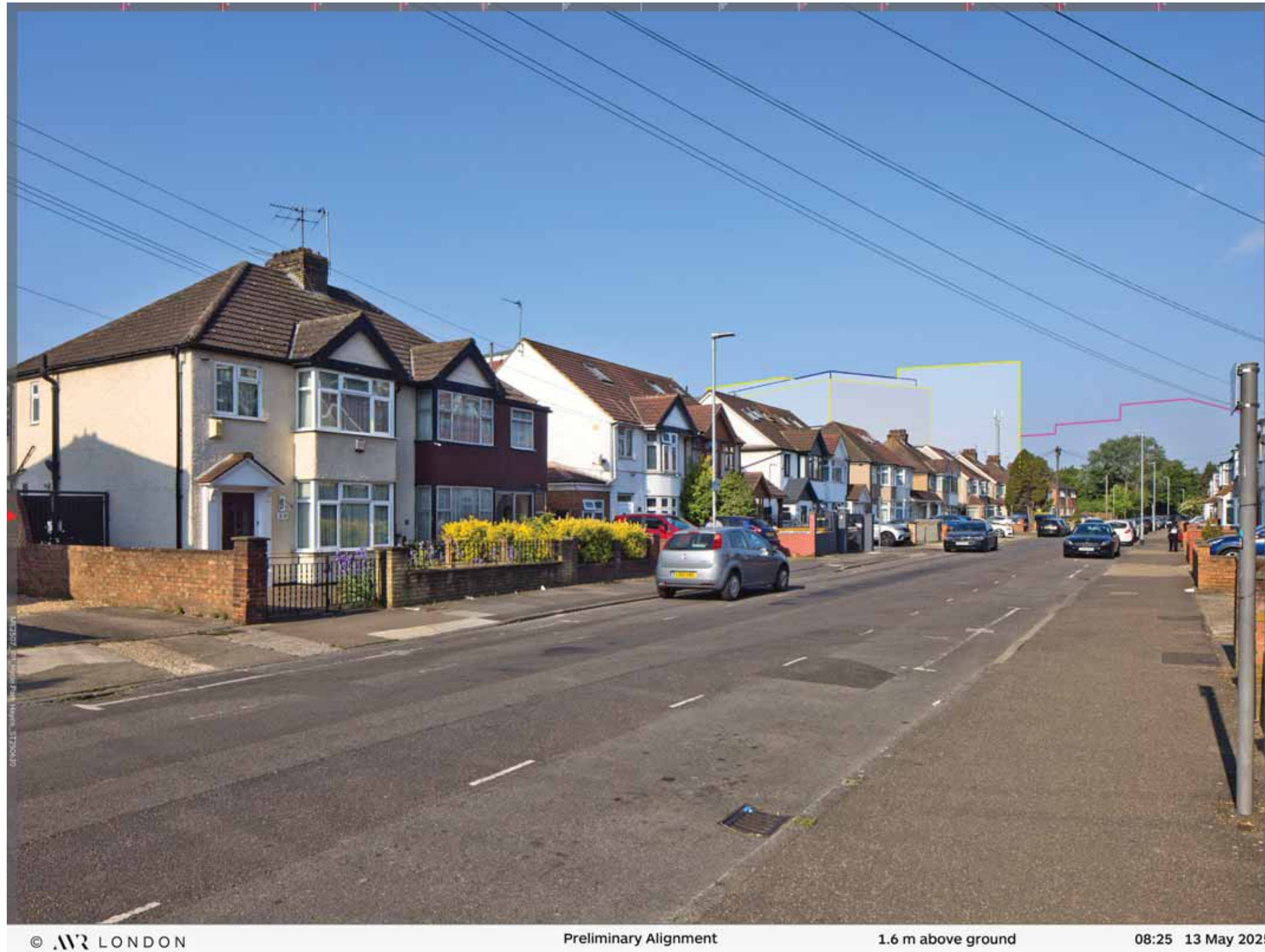


View 2C_ Keith Road

Hyde Park
Hayes
July 2025

— = Max Paramiter

— = Additional Plant Area



View 2C_ Keith Road



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Preliminary Alignment



1.6 m above ground

08:23 13 May 2025

Hyde Park
Hayes
July 2025



View 2D_ Keith Road