

# Report of the Head of Development Management and Building Control Committee Report

Case Officer: **Michael Briginshaw**

**79625/APP/2025/2128**

Date Application Valid:	<b>11.08.2025</b>	Statutory / Agreed Determination Deadline:	<b>31.03.2026</b>
Application Type:	<b>Outline</b>	Ward:	<b>Pinkwell</b>

Applicant: **Columbia Threadneedle Investments**

Site Address: **Land at HPH2, HPH5, and Multistorey Car Park  
Hyde Park Hayes**

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

Summary of Recommendation: **GRANT planning permission subject to section 106 legal agreement and conditions**

Reason Reported to Committee: **Required under Part 1 of the Planning Scheme of Delegation (Major application recommended for approval)**



## **Summary of Recommendation:**

GRANT planning permission subject to the completion of a satisfactory section 106 legal agreement to secure the heads of terms set out below, and subject to the conditions as set out in Appendix 1.

### S106 Legal Agreement Heads of Terms:

It is recommended that delegated powers be given to the Director of Planning and Sustainable Growth to grant planning permission subject to the following:

A) That the application be referred to the Mayor under Article 5 of the Town and Country Planning (Mayor of London) Order 2008.

B) That the Council enter into a legal agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) or any other legislation to secure the following:

- i. Affordable Housing: To secure provision of on-site affordable housing, using a cascade mechanism as follows:
  - a. To use all reasonable endeavours over a defined period of time to secure grant funding (in accordance with relevant guidance) in order to maximise delivery of affordable housing, with a minimum of 10% of total units (calculated by habitable room) provided as affordable housing (with a preference for Social Rent tenure).
  - b. Should the Council agree that all reasonable endeavours have been exhausted and grant funding has not been secured, the scheme shall revert to 100% private market (i.e. with no affordable housing).

The obligation shall include review mechanisms.

- ii. Health Contribution: A financial contribution to be calculated at the Reserved Matters stage, indicatively totalling £942,489 (calculated on the basis of a 100% private market Scenario and subject to detailed scheme calculations) to fund enhanced or new health facilities within the London Borough of Hillingdon. A proportional amount of the contribution, corresponding to the relevant phase, shall be paid prior to commencement of that phase.
- iii. Air Quality Mitigation Contribution: A financial contribution to be calculated at the Reserved Matters stage, indicatively totalling £174,299 (subject to detailed scheme calculations). A proportional

amount of the contribution, corresponding to the relevant phase, shall be paid prior to commencement of that phase.

- iv. Carbon Offset Contribution: Carbon Offset Contribution: A financial contribution to be calculated at the Reserved Matters stage, indicatively totalling £367,217 (subject to detailed scheme calculations). The obligation shall include monitoring measures (be seen). A proportional amount of the contribution, corresponding to the relevant phase, shall be paid prior to commencement of that phase.
- v. Public Open Space Contribution: A financial contribution to be calculated at the Reserved Matters stage, indicatively totalling £879,450, for the enhancement of existing public open space. A proportional amount of the contribution, corresponding to the relevant phase, shall be paid prior to commencement of that phase. Should the Council agree that a sufficient high quality open space for each phase is to be delivered, a contribution will not be required. All on site public open space should allow unfettered access in perpetuity.
- vi. Section 278 Agreement: A Section 278 agreement to deliver a crossing at North Hyde Road, prior to the occupation of Phase 1.
- vii. Hillingdon Council Active Travel Zone / Healthy Streets Contribution: Financial contributions to be calculated at the Reserved Matters stage, indicatively totalling £140,360. A proportional amount of the contribution, corresponding to the relevant phase, shall be paid prior to commencement of that phase.
- viii. Transport for London Contributions: Financial contributions to be calculated at the Reserved Matters stage, indicatively totalling the following amounts:
  - a. A312 contribution up to £54,640.
  - b. Bus Stop Enhancement contribution up to £598,000.A proportional amount of each contribution, corresponding to the relevant phase, shall be paid prior to commencement of that phase.
- ix. Residential Parking Permit Restrictions: Parking Permits restriction for residents and visitors (excluding Blue Badge holders).
- x. Employment and Construction Training Scheme: An Employment/ Construction Training Scheme secured in accordance with the Council's Planning Obligations SPD.

- xi. Project Management and Monitoring Fee: A Project Management and Monitoring Fee, equalling 5% of the total financial contributions to be paid under this agreement.

C) That in respect of the application for planning permission, the applicant meets the Council's reasonable costs in preparing the Section 106 Agreement and any abortive work as a result of the agreement not being completed.

D) That officers be authorised to negotiate and agree the detailed terms of the proposed agreement and conditions of approval and agree any changes requested by the Greater London Authority.

E) That, if the Legal Agreement has not been finalised within 6 months (or such other time frame as may be agreed by the Director of Planning and Sustainable Growth), delegated authority be given to the Director of Planning and Sustainable Growth to refuse planning permission for the following reason:

'The applicant has failed to mitigate the impacts posed by the proposed development (in respect of Affordable Housing, Health, Air Quality, Carbon Emissions, Public Open Space, Active Travel, Highways Safety, Employment and Planning Obligations Monitoring). The scheme therefore conflicts with Policies DMCI 7 of the Hillingdon Local Plan: Part 2 (2020); the adopted Planning Obligations Supplementary Planning Document (2014); Policy DF1 of the London Plan (2021); and paragraphs 56-58 of the National Planning Policy Framework (2024).'

F) That if the application is approved, that the permission is subject to the Conditions as set out in Appendix 1.

## **1 Executive Summary**

1.1 This application seeks Outline Planning Permission (with all matters reserved excluding access) for demolition of existing buildings (above basement level) and phased delivery of a residential development (Class C3), flexible commercial / community floorspace (368m<sup>2</sup>), new public realm, landscaping, play space, car parking, cycle parking and associated works.

1.2 More specifically, the development would demolish three buildings within the Hyde Park Hayes (HPH) estate, including HPH2, HPH5, and the multistorey car park (MSCP), and would redevelop these plots of land alongside the surface car park abutting North Hyde Road with residential blocks. HPH1 is outside the red line boundary of the site but is to be converted from office to mixed-use, including an office at ground level and residential units above (subject to Prior Approval application reference 67351/APP/2024/2746).

- 1.3 As the application is in Outline with all matters reserved, the illustrative scheme for 650 units is proof of concept only. At its maximum, the development could comprise up to 673 units, subject to controls set out within the Design Code and Parameter Plans. The illustrative unit mix is proposed to be 44% 1-bed units, 41% 2-bed units and 15% 3-bed units. The housing mix ranges are proposed to be secured by Condition 6, including provision of at least 15% 3-bed family units. The residential blocks are proposed in a mix of urban grains and typologies, ranging from 3, 6, 8, 10 and 11 stories in height, including denser urban residential blocks as well as some townhouses.
- 1.4 The proposed loss of the existing underutilised office use is accepted in principle. There are no objections to the physical loss of the existing office buildings either as they are not considered to have significant architectural merit. Significantly, the provision of much needed residential units on sustainably located brownfield land within close proximity to Hayes Town Centre and only 500m (8 minute walk) of the Hayes and Harlington Station is supported. The proposed flexible commercial / community space will generate jobs on a site which is generally accepted as underutilised in its current form. It is noted that the new residents of the development will provide further business for local traders and support the vitality and viability of Hayes Town Centre. This weighs significantly in favour of the development in the planning balance.
- 1.5 The proposal for 15% family housing (3-bedroom units) is a positive provision for a large strategic residential scheme and would contribute to meeting need within the borough. In terms of affordable housing, the scheme has been subject to viability testing by the Council's third-party consultants and the Greater London Authority (GLA). Following such assessment, it has been concluded that a 100% private market scheme generates a deficit but is within the range of deliverability. Despite this, the developer has agreed to enter into a S106 legal agreement which would obligate them to carry out all reasonable endeavours to secure grant funding and maximise affordable housing provision on-site. Should it be sufficiently evidenced, in agreement with the Council, that all reasonable endeavours have been exhausted and that no grant funding has been secured to realise affordable housing provision, the scheme would revert to 100% private market housing. Given the significant viability constraints on the proposed scheme, it is concluded that the proposed conditional cascade mechanism would realise the maximum amount of affordable housing possible, especially given the announcement of the GLA's emergency measures for housebuilding which have been introduced to accelerate housebuilding, unlock stalled sites and provide housebuilders with more certainty by improving both the viability and deliverability of residential schemes. The conditional affordable housing cascade mechanism is proposed to be secured under S106 HoT (i) and includes viability review mechanisms to capture changes in viability over the lifetime of the multi-phase residential development. This is the reasonable and robust evidence based position which is considered, on the balance of probabilities, to realise sufficient public benefit by maximising the likelihood of affordable housing delivery.

- 1.6 Parameter Plans and a Design Code support the Outline Planning application submission, establishing parameters and design rules that future Reserved Matters must follow. The Parameter Plans fix maximum building footprints, heights, land uses, basement extent, movement routes and the layout of open space, SuDS, trees and front gardens. The Design Code complements this by setting the rules for delivering a coherent, landscape-led and sustainable neighbourhood, covering massing, active frontages, pedestrian-focused streets, SuDS, biodiversity (10% BNG), urban greening (UGF 0.4), parking strategy and standards for play, refuse and cycle provision. Despite positive amendments being made as part of the application process, concerns were raised regarding the deliverability, quality and functionality of certain open spaces. Notwithstanding, the Parameter Plans and Design Code are considered to strike a reasonable balance against best-practice Design Code guidance documents, which emphasise that effective design codes should be simple, specific and proportionate. To address residual uncertainties and ensure high-quality delivery, the applicant has agreed that a revised Design Code will be secured by Condition 22, alongside further conditions requiring detailed materiality and landscape information at Reserved Matters stage.
- 1.7 Other matters which are considered to be planning policy conflicts include the delivery of a shortfall in amenity space provision, play space provision, and open space provision. However, these are considered to be minor conflicts with standards exhibited by the illustrative scheme, not a detailed scheme which would be submitted as part of the Reserved Matters stage of the planning application process. Conditions are proposed to maximise quantity and quality of these spaces, including a revised Design Code.
- 1.8 Significant weight is afforded to the Government's Written Ministerial Statement on Planning Reform: Next Phase (18 November 2025), which confirms a national policy intention to "unleash development around rail stations" by providing a "default yes" to suitable, well-designed development within a reasonable walking distance of well-connected railway and tram stations. The statement emphasises that development of the right quality and density in such locations represents a highly sustainable form of growth, maximising the use of existing public transport infrastructure, reducing car dependency, and supporting housing delivery and economic growth. The Ministerial Statement makes clear that this approach should apply consistently across all local authority areas and is intended to be embedded within the revised National Planning Policy Framework as a strengthened expression of the presumption in favour of sustainable development. In this context, the application site's proximity to a major rail station represents a material consideration of significant weight, and any assessment of the proposal must give due regard to the Government's clear expectation that sustainably located development adjacent to stations should be supported unless demonstrable harm would clearly outweigh the substantial public benefits identified.
- 1.9 Planning obligations are proposed to secure affordable housing provisions, health contribution, an air quality contribution, carbon offset contribution, public open space contribution, highways works, active travel zone and healthy streets

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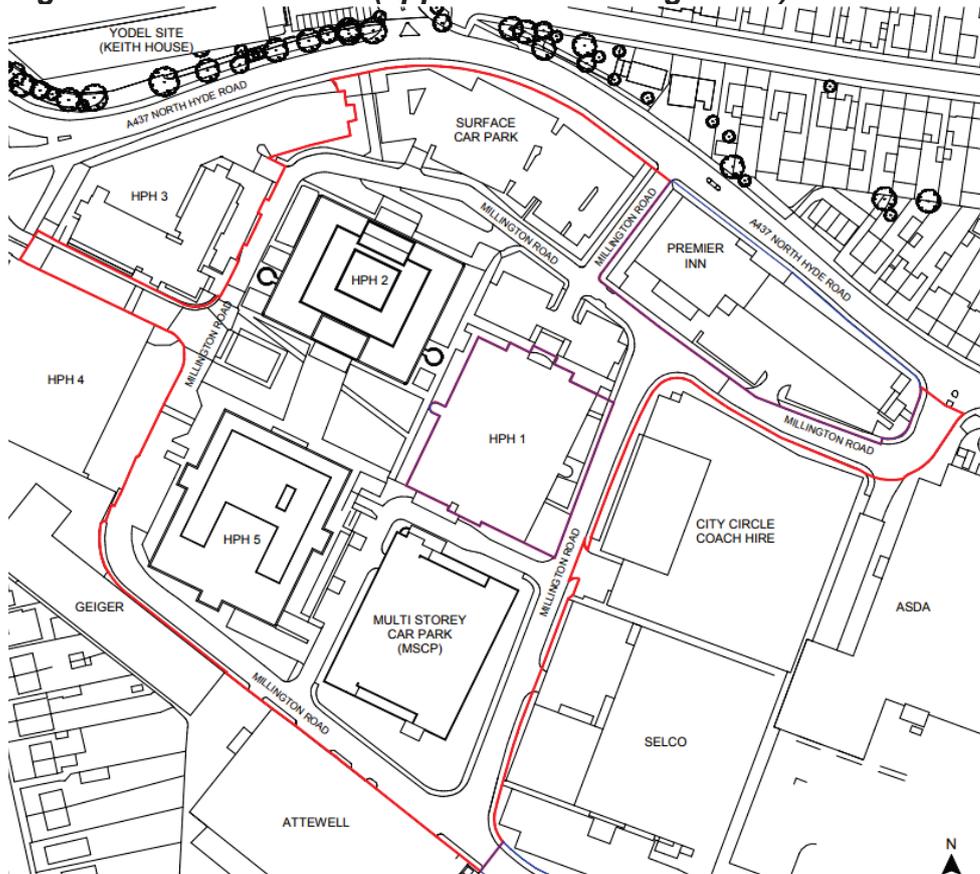
**PART 1 – Members, Public & Press**

contribution, TfL contribution, parking permit restrictions, and employment strategy and construction training. A project management and monitoring fee would also be secured to manage and monitor the planning obligations.

- 1.10 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. For the reasons outlined above and within the main body of the report, the application is considered to broadly comply with the Development Plan. Where there are minor conflicts with the Development Plan, there are considered to be sufficient mitigating factors and benefits which outweigh such conflicts. Subject to the planning conditions and obligations recommended, the proposed development can mitigate the planning policy conflicts identified. Accordingly, the development is considered, on balance, to be acceptable with respect to design, heritage, residential amenity, environmental issues, transport, and sustainability.
- 1.11 The application is recommended for approval, subject to Stage 2 referral to the Mayor of London, securing the planning conditions set out in Appendix 1 and a Section 106 legal agreement.

## 2 The Site and Locality

**Figure 1: Location Plan (application site edged red)**



- 2.1 The site is a large plot of land, measuring circa 2.36 hectares in area, and forms part of the wider Hyde Park Hayes commercial estate. The wider estate comprises three large office buildings called Hyde Park Hayes 1 (HPH1), Hyde Park Hayes 2 (HPH2) and Hyde Park Hayes 5 (HPH5), and sit alongside a multi-storey car park (MSCP). Please see Figure 2 below for a view of HPH2 and HPH5 as seen from Millington Road.

**Figure 2: Street View Image of the HPH2 (Background) and HPH5 (Foreground)**



- 2.2 The HPH1 building does not form part of the application submission but is a material planning consideration and is subject to a Prior Approval application (ref. 67351/APP/2024/2746) to change the use of the building from offices to a mixed use, including an office at ground level and residential units above. The ground floor of this building is occupied by Apple on a short term lease and gives the tenant the right of access to 62 parking spaces, located in the surface level car park next to HPH1 and the MSCP.
- 2.3 The Hyde Park Hayes 3 (HPH3) building and Hyde Park Hayes 4 (HPH4) plot do not form part of the application either and sit on the western edge of the Hyde Park Hayes site. HPH3 is now occupied as residential flats having been granted Prior Approval in September 2021 under application reference 72360/APP/2021/1709 for the change of use from offices to 113 flats. HPH4 has been the subject of application references 76655/APP/2021/3039 and 76655/APP/2023/779 and has been granted permission in April 2022 and June

2023 for the re-development of the site to provide a residential development comprising 131 units. The HPH4 permissions have now lapsed.

- 2.4 Residential properties are located to the north of the site along Keith Road and North Hyde Road, south along Dawley Road and west along Bourne Avenue, Waltham Avenue, and Guinness Close. The Yodel warehouse is also located to the north and has been the subject of two planning applications (refs. 27189/APP/2020/2181 and 27189/APP/2021/2782), granting permission for 150 residential units and 376 no. Shared-Living units. The Premier Inn hotel is also located to the north-east of the site and has consent under application reference 78950/APP/2024/2084 for alterations to the hotel, resulting in an increase in hotel rooms from 150 to 159 and reduction in restaurant space.
- 2.5 The City Circle UK coach storage site, Selco Builders warehouse site and Hayes Asda Superstore is located to the east of the site. Further commercial uses are located to the south, including Nippon Express, Attewell Ltd and Geiger UK. Further outside of the Hyde Park Hayes site, a roundabout intersecting Dawley Road, North Hyde Road and Bourne Avenue is located to the west. Millington Road runs through the site, connecting the roundabout on the west to Station Road to the east. North Hyde Road also bounds the site to the north.
- 2.6 The Hyde Park Hayes site is an edge-of-centre location with urban and suburban characteristics, noting that Hayes Town Centre is designated circa 400m to the north-east of the application site. The site also sits just outside the Hayes Housing Zone.
- 2.7 According to the Council's GIS, the site is subject to potentially contaminated land. The site also forms part of the Council's declared Hillingdon Air Quality Management Area and Hayes Air Quality Focus Area, where air quality conditions exceed the EU annual mean limit value for nitrogen dioxide (NO<sub>2</sub>), have high human exposure and current planned measures are insufficient to resolve the poor air quality issues. The site has a good Public Transport Accessibility Level (PTAL) rating of 4, abutting land to the east which has a PTAL rating of 5, benefitting from the improved transport connections at Hayes & Harlington Crossrail station.
- 2.8 A Strategic Industrial Location is located circa 200m to the north of the site, alongside the designated Botwell: Thorn EMI Conservation Area, Old Vinyl Factory, Grade II Listed Enterprise House, Locally Listed 'His Master's Voice' building and Locally Listed Thorn/EMI Building.

### 3 Proposal

**Figure 3. Illustrative Masterplan CGI (sourced from D&A (Dated July 2025))**



3.1 The application seeks Outline Planning Permission (with all matters reserved excluding access) for demolition of existing buildings (above basement level) and phased delivery of residential development (Class C3), flexible commercial / community floorspace, new public realm, landscaping, play space, car parking, cycle parking and associated works. The illustrative scheme proposes the construction of 8 blocks and 2 rows of townhouses up to 11 storeys to provide 650 units, with circa 368m<sup>2</sup> of flexible commercial / community floorspace (including E(a) retail, E(b) food and drink, E(e) medical or health services, E(f) nursery, E(g)(i) offices, F.2(a) shop with essential goods, F.2(b) hall or meeting place for local community). Whilst the illustrative scheme proposes 650 units, as all matters are reserved, the Outline Planning application technically proposes up to 673 units. Please see Figure 3 for the CGI of the illustrative masterplan and see Table 1 for a breakdown of the 650 unit scenario.

**Table 1. Illustrative Scheme Unit Mix**

Unit Type	Total Units	% of Total Units
Studio	4	44.0%
1 Bed 2 Person	282	40.6%
2 Bed 3 Person	62	
2 Bed 4 Person	202	
3 Bed 5 Person	100	15.4%
<b>Total Units</b>	<b>650</b>	<b>100%</b>

3.2 The illustrative scheme development comprises five main residential blocks (including more sub-blocks), including Blocks A1 and A2 within the northern

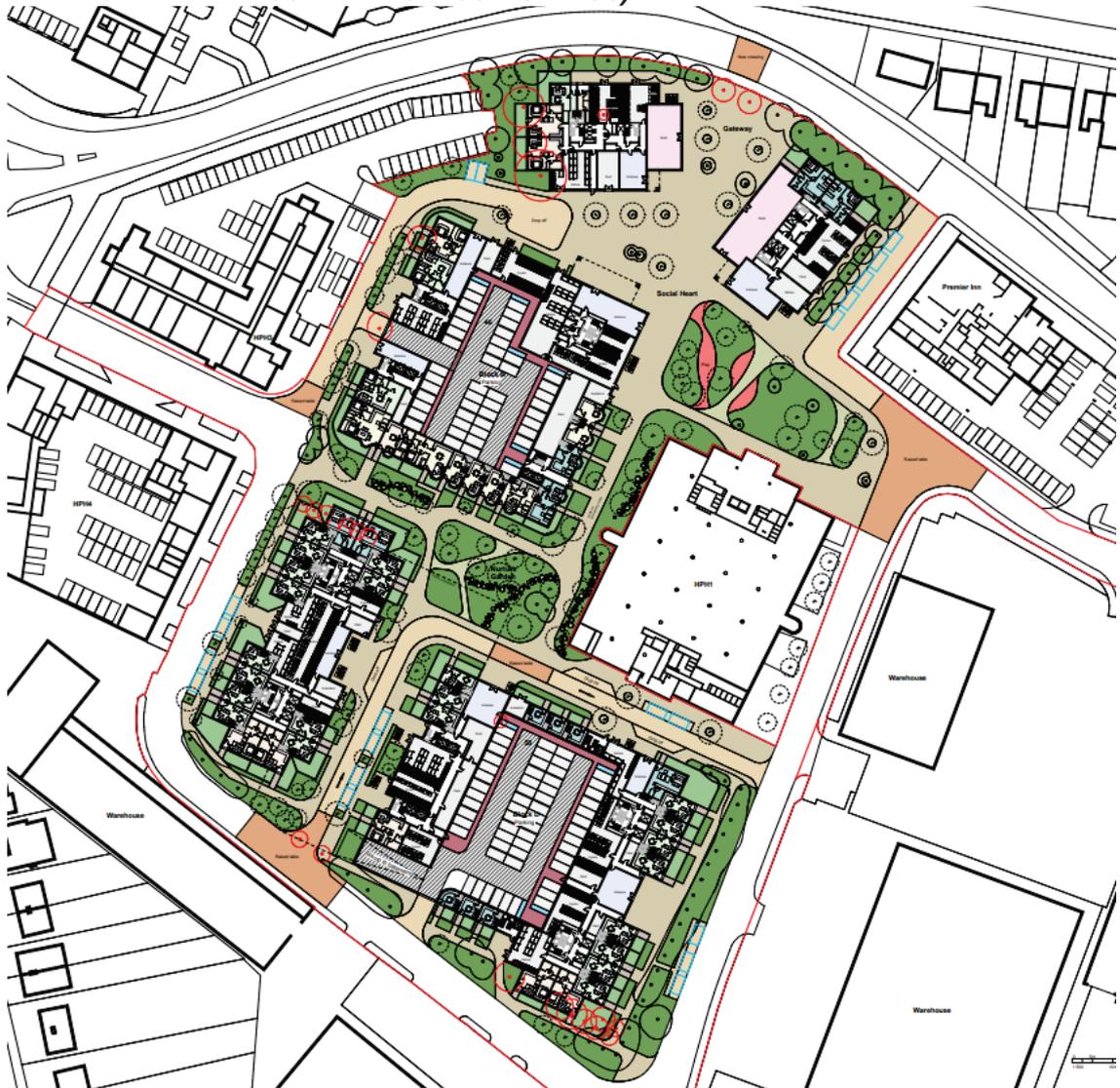
section of the site abutting North Hyde Road, Block B within the centre of Hyde Park Hayes, Block C to the south-western corner of the site and Block D to the south-eastern corner of the site. The range in block heights is summarised in Table 2 below.

**Table 2. Illustrative Scheme Proposed blocks by Use and Height**

<b>Block</b>	<b>Max Heigh (Storeys)</b>	<b>Use and Quantity</b>
A1	11	88 units and 368m2 of flexible commercial / community floorspace
A2	8	66
B1	8	82
B2	11	58
B3	6	37
C	10	120
D1	8	72
D2	10	121
Townhouses	3	6

- 3.3 Three communal public spaces are proposed, named the Gateway, Social Heart and the Nurture Garden. The Gateway space would provide access through the northern part of the site from North Hyde Road, a space which is envisaged to be activated by the flexible commercial / community units proposed at the ground level of Blocks A1 and A2. The Social Heart connects to this space, sitting between Block A, Block B and HPH1. This space would provide amenity space with a more residential focus, being set further within the site and away from the active Gateway space. The Nurture Garden is set even further within the site, between Block B, Block C, Block D and HPH1. Again, the function of this space is envisaged to be more residential in nature. All spaces would be publicly accessible but would invariably provide benefit to future residents in the form of amenity provision. Please see Figure 4 for the proposed illustrative site plan.

**Figure 4. Illustrative Masterplan Level 00 (sourced from drawing ref. A12440-TPB-ZZ-L00-DR-A-041001-S2-P08)**



3.4 Parameter Plans and a Design Code support the Outline Planning application submission, establishing parameters and design rules that future Reserved Matters must follow. Accordingly, the Illustrative Masterplan has been synthesized down into a set of Parameter Plans and a Design Code. The Parameter Plans cover a number of material considerations and are listed below:

- 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
- Parameter Plan 7 - 3D Max Building Heights
- Parameter Plan 8 - Basement Zones Plan

- 3.5 During the application process, amended Parameter Plans, Design Code and illustrative scheme plans were submitted in response to feedback from the Council. The updated Parameter Plans refined the scheme, including minor shifts to the building zones to improve layout and movement, enhancements to pedestrian priority and traffic calming through revised access arrangements, increased landscape and open-space provision (particularly around Block B) and a reduction in massing to the northern end of Block B1. Additional Class E floorspace is now focused at the gateway to strengthen activation, while tree retention has improved through repositioning of Blocks A2 and D. Corresponding updates to the Illustrative Masterplan reflect these changes, including an adjusted residential mix, enhanced ground-floor uses, and reconfigured cycle storage.
- 3.6 Please note that larger versions of the plans can be found in the Committee Plan Pack.

#### **4 Relevant Planning History**

- 4.1 A list of the relevant planning history related to the property can be found in Appendix 2. As the site comprises a significant part of the Hyde Park Hayes site, relevant planning history for the site is also summarised below, including history relating to HPH2 and HPH5 which form part of the application site, and HPH1 and HPH4 which directly adjoin the site.

##### *Application Site History*

- 4.2 HPH2 (formerly Safeway House, 6 Millington Road) was granted consent under planning permission ref. 40652/87/1562, dated 16-12-1987, for:

*Redevelopment of site involving the erection of a three storey building for use as an office with part industrial and storage use (Use Class B8) together with associated car parking facilities, landscaped areas and a new electricity substation at Unit 2 and 4 Westlands Industrial Estate, Millington Road, Hayes.*

- 4.3 HPH5 was granted consent under planning permission ref. 45753/APP/2012/2029, dated 05-07-2013, for:

*Erection of five storey building to provide 13,880sq.m of Class B1(a) Office floorspace, provision of car parking spaces at surface and basement level, associated landscaping and ancillary works.*

##### *Adjoining Hyde Park Hayes Site History*

- 4.4 HPH1 has been granted Prior Approval to change of use of the offices to residential under permission ref. 67351/APP/2024/2746, dated 11-04-2025, described as follows:

*Change of use from offices (Use Class E) to residential (Use Class C3) to create 75no. self-contained flats under Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended).*

4.5 HPH4 has been the subject of permission references 76655/APP/2021/3039 dated 07-04-2022, 76655/APP/2023/779 dated 26-06-2023, and 76655/APP/2024/1152 dated 04-10-2024, which permitted the re-development of the site to provide a residential development comprising 131 units. These permissions have now lapsed.

## 5 Planning Policy

5.1 A list of planning policies relevant to the consideration of the application can be found in Appendix 3.

## 6 Consultations and Representations

6.1 A total of 697 no. letters were sent to neighbouring properties, a site notice was displayed to the front of the site and an advert was posted in the local paper. The neighbour consultation process expired on 24<sup>th</sup> September 2025 and a total of six comments were received. One comment in support and three comments in objection to the application were received from members of the public. Two additional comments were also received and were considered to fall under the 'neutral' category as neither in support nor in objection to the application.

6.2 Representations received in response to public consultation are summarised in Table 3 (below). Consultee responses received are summarised in Table 4 (below). Full copies of the responses have also separately been made available to Members.

**Table 3. Summary of Representations Received**

Representations	Summary of Issues Raised	Planning Officer Response
A total of three comments in objection to the development were received from neighbouring residents.	1. The development will cause congestion and highways safety issues.	All comments in objection are noted and taken into consideration as part of the planning assessment.  Please refer to the <i>Transport</i> section starting paragraph 7.134 of this report.

	2. The development will overshadow neighbouring residents and impact on quality of life.	Please refer to the sections of this report starting at paragraphs 7.34 ( <i>Tall Building</i> ), 7.41 ( <i>Impact on the Character and Appearance of the Area</i> ), 7.53 ( <i>Residential Quality</i> ) and 7.59 ( <i>Residential Amenity</i> ).
	3. The development will cause air pollution.	Please refer to the <i>Air Quality</i> section starting paragraph 7.108 of this report.
	4. The development will increase pressure on infrastructure.	Whilst the development would increase pressure on infrastructure, any permission granted would ensure that acceptable details are secured by condition to avoid significant harm. The proposal is also liable to the Community Infrastructure Levy and Section 106 obligations which contribute to the maintenance and improvement of infrastructure.
One comment in support of the development was received from a resident.	1. The development could improve the local area and create useful public space.	All comments in support are noted and taken into consideration as part of the planning assessment.

Two neutral comments were received from residents.	1. The development should incorporate and celebrate the site's rich aviation heritage.	<p>All neutral comments are noted and taken into consideration as part of the planning assessment.</p> <p>Design Code rule DC 1.18 states that a visual marker must be provided at the centre or entrance of the gateway such as a piece of public artwork or sculpture. This should reference the Fairey Aviation Company. The theme should be carried through to the Social Heart and Nurture Garden.</p>
	2. The proposed commercial unit should be occupied by a local hospitality business which should be supported to ensure that the space does not remain empty.	The commercial space is proposed to be flexible to increase the likelihood of occupation. Uses include E(a) retail, E(b) food and drink, E(e) medical or health services, E(f) nursery, E(g)(i) offices, F.2(a) shop with essential goods, F.2(b) hall or meeting place for local community.

**Table 4. Summary of Consultee Responses**

<b>Consultee and Summary of Comments</b>	<b>Planning Officer Response</b>
<b>External Consultation</b>	
<p><b>Affinity Water:</b></p> <p>No objection, provided the developer:</p> <ul style="list-style-type: none"> <li>• Implements robust pollution prevention during construction</li> <li>• Incorporates strong water-efficiency measures</li> <li>• Coordinates early on required water infrastructure connections or diversions</li> </ul>	<p>The Affinity Water comments are noted and taken into consideration as part of the planning assessment.</p>

<p><b>Cadent Gas Ltd:</b></p> <p>No objection.</p>	<p>The Cadent Gas Ltd comments are noted and taken into consideration as part of the planning assessment.</p>
<p><b>Greater London Archaeological Advisory Service (GLAAS):</b></p> <p>The desk-based assessment should be enhanced with a specialist assessment of Palaeolithic potential and consideration of the consequent impact of the proposed development in order to determine if mitigation measures would be justified, and what form they might take.</p> <p>The RPS Response (para 13) suggests that ‘appropriate planning conditions’ to control foundation design could avoid or minimise potential impacts. Since such condition would have to be pre-commencement it would have to be agreed by the applicant and to be acceptable would have to allow for a range of potential mitigation scenarios.</p> <p>No objection subject to a condition.</p>	<p>The GLAAS comments are noted and taken into consideration as part of the planning assessment.</p> <p>Condition 30 is proposed to be secured.</p>
<p><b>Hayes Town Partnership:</b></p> <p>1) Principle</p> <p>The proposal to demolish the underused office buildings at Hyde Park Hayes and replace them with housing is supported in principle, provided the applicant demonstrates (1) genuine efforts to market the offices for continued employment use, and (2) a clear comparison of the carbon impact of refurbishment versus redevelopment.</p> <p>The development must address Hayes’ pressing local needs, particularly around housing, social infrastructure, and heritage.</p> <p>2) Housing</p> <p>The most urgent needs locally are for:</p> <ul style="list-style-type: none"> <li>• Genuinely affordable homes</li> </ul>	<p>The Hayes Town Partnership comments are noted and taken into consideration as part of the planning assessment.</p> <p>1) Please see paragraphs starting at 7.1 for consideration of the Principle of Development.</p> <p>2) Please see paragraphs starting at 7.20 and 7.26 for consideration of the Unit Mix and Affordable Housing.</p> <p>3) The potential provision of on site GP practice is not something that can definitively be secured at this stage of the planning</p>

<ul style="list-style-type: none"> <li>• Larger family-sized homes</li> </ul> <p>The applicant must ensure these priorities shape the scheme from the outset, especially given the absence of a confirmed development partner.</p> <p>3) Social Infrastructure</p> <p>Rapid growth driven by the Elizabeth Line has not been matched by expanded community services—especially GP provision, worsened by the recent cancellation of the Old Vinyl Factory surgery. The site offers a key opportunity to include a purpose-built GP practice, potentially funded through the Community Infrastructure Levy. This would help integrate the development with the wider community rather than creating another isolated enclave.</p> <p>4) Heritage</p> <p>The site’s history as the home of Fairey Aviation, one of Britain’s major aircraft innovators, is a significant cultural asset that is not adequately reflected in the current proposals. Opportunities exist to celebrate this legacy through:</p> <ul style="list-style-type: none"> <li>- Public art and sculptures</li> <li>- Historic naming of streets and buildings</li> <li>- Interpretation boards and walking routes</li> <li>- Heritage displays during construction</li> </ul> <p>Recognising this history would strengthen community identity and support local educational initiatives.</p> <p>5) Environment, Public Realm, and Landscaping</p> <p>Retention of existing mature trees, especially around site boundaries and North Hyde Road, is essential to maintaining visual quality and providing natural screening. Proposed communal spaces provide opportunities to embed heritage interpretation.</p> <p>6) Play Space and Open Space</p>	<p>process with no guarantee over take-up from a healthcare provider (which in the case of Hillingdon has been secured previously without any agreement to enter into a lease and occupy). Flexible commercial / community space has been secured on site and can be used for healthcare purposes should proposals develop towards such provision at the Reserved Matters stage of the application process. Please do note that a significant sum is proposed to be secured via S106 HoT ii and would be for the purposes of primary care provision in and around Hayes.</p> <p>4) This is addressed by the Design Code. Rule DC 1.18 states that a visual marker must be provided at the centre or entrance of the gateway such as a piece of public artwork or sculpture. This should reference the Fairey Aviation Company. The theme should be carried through to the Social Heart and Nurture Garden.</p> <p>5) Amended Parameter Plans have been secured through the application process in order to secure the retention of more of the existing mature tree planting. The quality of public realm and landscaping is secured through the Design Code and Parameter Plans which are discussed in more detail</p>
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<p>Good-quality, sunlit play spaces are supported. Safe routes for walking and cycling to Pinkwell Park and Lake Farm Country Park are needed due to their distance.</p> <p>7) Transport</p> <p>A pedestrian crossing near Keith Road is welcomed, and improvements to a nearby piece of open land are possible. Strict control of resident parking in surrounding streets is essential.</p> <p>8) Cycling</p> <p>The travel plan overestimates the practicality of cycling locally: the network is fragmented and Bournes Bridge remains dangerous. Developer funding should prioritise infrastructure improvements rather than large volumes of unused cycle parking.</p> <p>9) Retail</p> <p>On-site retail should be limited to avoid undermining Hayes Town Centre and to ensure the development supports existing local businesses.</p>	<p>in paragraphs starting at 7.30.</p> <p>6) A financial contribution towards Active Travel Zone and Healthy Streets improvements is proposed to be secured under S106 HoT vii.</p> <p>7) A parking permit restriction for residents and visitors is proposed under S106 HoT ix.</p> <p>8) An acceptable final and detailed Travel Plan is proposed to be secured under Condition 49. A financial contribution towards active travel, healthy streets and bus service improvements is also proposed to be secured under S106 HoT viii.</p> <p>9) The small scale flexible commercial / community space is proposed to activate North Hyde Road and the proposed Gateway space. Given that the site is already a town centre use in a non-town centre location, the proposal is considered to reduce the vitality and viability impact of the site on Hayes Town Centre.</p>
<p><b>Health and Safety Executive (Planning Gateway One):</b></p> <p>No objection subject to a condition for a satisfactory fire statement.</p>	<p>The Health and Safety Executive comments are noted and taken into consideration as part of the planning assessment.</p> <p>A final comprehensive Fire Statement is proposed to be secured by Condition 51.</p>

<p><b>Heathrow Airport Safeguarding:</b></p> <p>No objection subject to conditions to control:</p> <ol style="list-style-type: none"> <li>1. Height Restriction</li> <li>2. Radar Mitigation</li> <li>3. Bird Hazard Management</li> <li>4. Glint and Glare Review</li> <li>5. Landscaping Controls</li> </ol>	<p>The Heathrow Airport Safeguarding comments are noted and taken into consideration as part of the planning assessment.</p> <p>The following Conditions are proposed to be secured:</p> <p>Condition 10 - Height Limitation on Buildings and Structures</p> <p>Condition 33 - Radar Mitigation Scheme</p> <p>Condition 36 - Landscape Scheme</p> <p>Condition 40 - Bird Hazard Management Plan</p> <p>Condition 45 - Glint &amp; Glare Assessment</p>
<p><b>London Fire Brigade:</b></p> <p>No response received.</p>	<p>n/a</p>
<p><b>Metropolitan Police (Secured by Design):</b></p> <p>No response received.</p>	<p>Whilst Officers have not received detailed comments from Secured by Design Officers, Condition 52 is proposed to secure appropriate accreditation.</p> <p>Officers are also satisfied that the Reserved Matters application would ensure the scheme would be acceptable from Secure by Design perspective given the design rules secured as part of the Design Code.</p>
<p><b>Metropolitan Police (Estate Strategy &amp; Engagement):</b></p>	<p>The Metropolitan Police (Estate Strategy &amp; Engagement) comments are noted and taken into</p>

<p>The Metropolitan Police Service (MPS) requested Section 106 contributions to mitigate the policing impacts of new residential development. While Secured by Design measures are encouraged, they cannot lawfully reduce policing deployment, nor do they remove the need for additional police infrastructure required as a direct result of population growth (e.g., officer equipment, vehicles, premises).</p> <p>The proposed development will generate measurable increases in crime, call-handling, patrol demand and use of police systems, which cannot be absorbed within existing overstretched resources, particularly given the MPS's current capital funding constraints and budget shortfalls from 2023/24 onwards. National policy, including NPPF paragraphs 92, 97 and 130, alongside London Plan Policy S1, provides explicit support for ensuring safe, resilient, well-policed communities.</p> <p>The MPS concludes that without a police contribution the development would place unacceptable pressure on local policing capacity, undermining community safety, and therefore the requested S106 funding is necessary, lawful, and essential to make the development acceptable in planning terms.</p>	<p>consideration as part of the planning assessment. The request in this specific instance is not proposed to be secured for the following reasons:</p> <p><b>1) Funding responsibility:</b> The provision of police infrastructure is not the responsibility of individual developers. The demand for policing and associated equipment arises from the wider population of Hayes and existing communities, including future residents, who contribute to policing services through general taxation, rather than development specific channels.</p> <p><b>2) Existing strategic context:</b> There is currently no adopted MPS estates strategy that the Council can rely upon to evidence a defined policing infrastructure requirement specific to this location or this development.</p> <p><b>3) Policy prioritisation:</b> Local Plan Policy DF1 requires that contributions be prioritised towards critical infrastructure such as transport and health. Given the financial viability constraints affecting the scheme, only infrastructure that is essential, evidenced, and compliant with statutory tests can be sought.</p> <p><b>4) Regulation 122 tests:</b> The requests fail to meet the three legal tests set out in</p>
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	Regulation 122 of the Community Infrastructure Levy Regulations 2010. At the time of the assessment, within the current Planning Policy Framework, the MPS contribution is not considered to meet the CIL tests. This does not mean it will not under future Development Plan Frameworks.
<p><b>Ministry of Defence (MOD):</b></p> <p>No objection.</p>	The MOD comments are noted and taken into consideration as part of the planning assessment.
<p><b>National Air Traffic Services (NATS):</b></p> <p>NATS has reviewed the proposed development and anticipates that it will interfere with the H10 radar at Heathrow Airport due to the buildings' height, scale, and direct line of sight to the radar. This would cause radar reflections, generating false aircraft targets that increase air traffic controller workload and compromise aviation safety. As a result, NATS requires strict safeguarding conditions to be attached to any planning permission.</p> <p>No objection subject to conditions for the following:</p> <ol style="list-style-type: none"> <li>1. Radar Mitigation Scheme (RMS)</li> <li>2. Construction Height Control</li> </ol>	<p>The NATS comments are noted and taken into consideration as part of the planning assessment.</p> <p>Conditions 10 and 33 are proposed to be secured.</p>
<p><b>Network Rail:</b></p> <p>No objection in principle but notes the following:</p> <p>Ground Levels: Developers must consult Network Rail before altering ground levels, and no excavations should occur close to railway embankments, bridges, or retaining structures to avoid compromising rail infrastructure stability.</p>	The Network Rail comments are noted and taken into consideration as part of the planning assessment.

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<p>Noise and Vibration: Given the site's proximity to the railway, the applicant must assess noise and vibration impacts in accordance with the NPPF. Railway operations may change without notice—including increased train frequency, night-time running, freight movements, and overnight maintenance with idling engines. Future residents should therefore be fully informed of both existing and potential future railway noise and vibration.</p> <p>Lighting: Any lighting from the development must be designed so it does not interfere with railway signalling or train drivers' visibility. Lighting colour, intensity, and placement must avoid creating confusion with signal aspects.</p>	
<p><b>National Health Service (NHS) Property Services:</b></p> <p>No objection subject to a financial contribution being secured towards additional primary care infrastructure to support the new population associated with this development.</p>	<p>The NHS comments are noted and taken into consideration as part of the planning assessment.</p> <p>Following discussion with both the NHS and Applicant Team, a financial contribution has been agreed and is secured under S106 HoT ii.</p>
<p><b>Thames Water:</b></p> <p>Thames Water raises several essential requirements that must be resolved before the development can be occupied or construction involving piling can begin.</p> <p>No objection subject to conditions relating to the following:</p> <ul style="list-style-type: none"> <li>• Foul Water Capacity</li> <li>• Piling Method Statement</li> </ul>	<p>The Thames Water comments are noted and taken into consideration as part of the planning assessment.</p> <p>Conditions 31 (Piling Method Statement) and 47 (Thames Water Condition) are proposed to be secured.</p>
<p><b>Transport for London (TfL) (Dated October 2025):</b></p> <p>While supportive of the site's potential and its good public transport accessibility (PTAL 4),</p>	<p>The TfL comments are noted and taken into consideration as part of the planning assessment.</p>

<p>TfL identifies several areas requiring further assessment, mitigation, or contribution.</p> <p>TfL requests the following to be secured through conditions or S106 obligations:</p> <ol style="list-style-type: none"> <li>1. Updated ATZ assessment</li> <li>2. Revisions to the pedestrian, cycling and public realm strategy</li> <li>3. Revised trip generation analysis</li> <li>4. Financial contributions for buses and Healthy Streets</li> <li>5. Delivery &amp; Servicing Plan, Parking Design &amp; Management Plan, CLP, and Travel Plan</li> </ol> <p><b>Transport for London (TfL) (Dated December 2025):</b></p> <p>Further information was submitted in response to TfL. The TfL response is summarised below.</p> <p>1) Active Travel &amp; Healthy Streets: The updated ATZ assessment is noted but could better assess wayfinding and night-time safety. TfL supports securing contributions to improve walking and cycling routes and stresses that the proposed pedestrian crossing must not affect bus operations and must also serve cyclists.</p> <p>2) Public Realm &amp; Connectivity: TfL supports improvements along Millington Road (South) and expects these to be secured through S106. A cycle network plan should be included at outline stage to secure clear principles for site-wide cycle connectivity.</p> <p>3) Parking: Given strong public transport accessibility, TfL maintains the site should be car-free. A Parking Management Plan must confirm removal of the 112 existing commercial spaces once leases expire.</p>	<p>Each point is addressed in turn:</p> <p>1) The updated ATZ is accepted on the basis that the application is for Outline Planning Permission only, with Reserved Matters to follow once the final detailed scheme is confirmed. Financial contributions towards active travel, healthy streets, bus stop enhancements and A312 enhancements have been agreed and secured under S106 HoTs viii.</p> <p>2) As Millington Road is a private road within the red line boundary of the application site within the Applicant's ownership, the Millington Road improvements are to be secured as a Reserved Matter supported by approval of details reserved by Condition 36 (Landscape Scheme). A S106 legal obligation is not required where a condition is possible.</p> <p>3. The requested Parking Design and Management Plan is proposed to be secured by Condition 50.</p> <p>4. Contributions towards bus service enhancements and the A312 Healthy Streets scheme are proposed to be secured under S106 HoT viii.</p> <p>5. The following Conditions are proposed to be secured:</p>
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<p>4) Trip Generation &amp; Mitigation: Despite further TRICS data, TfL still requires mitigation under London Plan Policy T4. Contributions requested are for bus service enhancements and the A312 Healthy Streets scheme.</p> <p>5) Servicing, Logistics &amp; Travel Planning: TfL supports conditions securing a Construction Logistics Plan, Delivery &amp; Servicing Plan, and a Travel Plan, with post-occupation review recommended.</p>	<p>Condition 28 - Demolition Management, Logistics Plan and Environmental Management Plan</p> <p>Condition 48 - Delivery, Servicing and Waste Management Plan</p> <p>Condition 49 - Travel Plans</p>
<p><b>Transport for London Infrastructure Protection (Safeguarding):</b></p> <p>No comment confirmed.</p>	<p>The Transport for London Infrastructure Protection (Safeguarding) comments are noted and taken into consideration as part of the planning assessment.</p>
<p><b>Internal Consultation</b></p>	
<p><b>Planning Policy Officer:</b></p> <p>Principle: The proposed development includes the loss of approximately 22,745sqm of office floorspace. The site is not located within a designated town centre or any other protected area for office uses as defined in the Local Plan. The applicant has provided a justification for the loss of office space, citing limited demand for office use in this location, as well as a lack of identified need for large-format office floorplans. Given the site's location and the evidence submitted, there is no in principle policy objection to the proposed loss of office floorspace in this location.</p> <p>Housing Size Mix: The proposed residential element includes 16% family sized homes (3+ bedrooms). This is broadly consistent with previously approved schemes, which also delivered 16.4% and above. Previous proposals with less than 10% were not supported, highlighting the importance of maintaining a suitable housing mix.</p>	<p>The Planning Policy Officer comments are noted and taken into consideration as part of the planning assessment.</p> <p>Following amendments to the Outline Planning application, it should be noted that the minimum level of family-sized homes is in fact 15%. This level of provision is still considered positively within the planning balance.</p>
<p><b>Access Officer:</b></p> <p>Any subsequent Reserved Matters application is required to provide 10% of dwellings to</p>	<p>The Access Officer comments are noted and taken into consideration as</p>

<p>have been designed to meet the standards for Category 3 M4(3) Wheelchair Accessible or Wheelchair Adaptable dwellings and all remaining units would need to be designed to the standards for Category 2 M4(2) dwellings, as set out in Approved Document M to the Building Regulations (2010) 2015.</p> <p>All such provisions should include the highest standard of inclusive design, ensuring accessibility for older and disabled people, to the public realm, car parking, and within the bounds of recreational and amenity spaces</p>	<p>part of the planning assessment.</p> <p>Condition 13 is a proposed to ensure that 10% of the residential units would be designed to the standards for Category 3 M4(3) dwellings, as set out in Approved Document M to the Building Regulations (2010) 2015 (or as amended).</p>
<p><b>Urban Design Officer:</b></p> <p>While most of the proposed changes are welcomed and supported in principle, the concerns raised by officers and the Design Review Panel regarding the size, quality and functionality of the proposed open space remain unresolved. The revisions do not fully address these issues, and the quality and usability of the public realm continue to be a concern. Several elements of the updated proposals appear aspirational, raising doubts about their feasibility. The amenity provision would remain fragmented rather than a larger open space which is more likely to be successful. While the design evolution is noted and partially supported, the proposal falls short in resolving the urban design concerns identified.</p> <p>Limited changes have been made to the Design Code, and significant concerns remain. The parameter plans fix building footprints and heights to deliver a high density scheme, without sufficient evidence that the spaces between buildings can deliver a high quality public realm. The public realm is expected to accommodate multiple functions, open space, play, SuDS, servicing, BNG and UGF, without tested layouts demonstrating that these elements can successfully coexist. Inconsistencies in the tree information further undermine confidence that the streets will meet required public realm standards. In addition, some Design Code clauses duplicate</p>	<p>The Urban Design Officer comments are noted and taken into consideration as part of the planning assessment.</p> <p>Please refer to paragraphs starting at 7.30 to 7.90 of the report for consideration of the design and amenity provisions.</p>

<p>the parameter plans. Overall, the Design Code lacks the certainty needed to secure quality outcomes and defers critical design decisions, resulting in an approach that appears aspirational rather than demonstrably deliverable.</p>	
<p><b>Daylight and Sunlight Consultant (Third Party):</b></p> <p>The submitted DSO assessment is well structured, follows BRE guidance, and its overall conclusions are broadly reasonable. There is no fundamental objection to the scheme on daylight and sunlight grounds at this stage. The Council's consultant identified some points of clarification which were resolved in part. The remaining matters were agreed to be resolved at the Reserved Matters stage of the planning application process in the event of an approval.</p>	<p>The Daylight and Sunlight Consultant comments are noted and taken into consideration as part of the planning assessment.</p> <p>It is noted that paragraph 130, part c) of the NPPF (2024) is also emphasised and states that when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards).</p> <p>It is also noted that the scheme is in Outline and as such, any application for Reserved Matters will need to be supported by a detailed final Daylight and Sunlight Assessment (please refer to Condition 23). The detail submitted for the Outline stage of the application process is considered to be sufficient and acceptable.</p>
<p><b>Wind and Microclimate Consultant (Third Party):</b></p> <p>The wind study is generally well structured and follows recognised methodology and best-practice guidance. Its overall conclusions</p>	<p>The Wind and Microclimate Consultant comments are noted and taken into consideration as part of the planning assessment.</p>

<p>are considered reasonable, and there is no fundamental objection in principle. The Council’s consultant identified some points of clarification which were resolved in part. The remaining matters were agreed to be resolved at the Reserved Matters stage of the planning application process in the event of an approval.</p>	<p>Chapter 12 of the NPPF (Achieving well-designed places) requires developments to provide safe, inclusive and attractive environments, but it also directs decision-makers to take a balanced view of design quality in context. Wind impacts should be weighed against the totality of benefits, minor or localised exceedances can be acceptable where the scheme achieves wider policy aims. This aligns with the BRE’s approach to daylight/sunlight—i.e., guidance is intended to inform, not control, design outcomes.</p> <p>It is also noted that the scheme is in Outline and as such, any application for Reserved Matters will need to be supported by a detailed final Wind and Microclimate Assessment (please refer to Condition 24). The detail submitted for the Outline stage of the application process is considered to be sufficient and acceptable.</p>
<p><b>Highways Authority:</b></p> <p>Subject to planning conditions and S106 obligations, no highway objection is raised.</p> <p>Conditions and S106 obligations requested include:</p> <ul style="list-style-type: none"> <li>• Delivery &amp; Servicing Plan and Construction Logistics Plan (pre-commencement)</li> <li>• Parking Design &amp; Management Plan (pre-occupation)</li> </ul>	<p>The Highways Authority comments are noted and taken into consideration as part of the planning assessment.</p> <p>The following Conditions are proposed to be secured:</p> <p>Condition 20 - Parking spaces leased and not sold</p>

<ul style="list-style-type: none"> <li>• Travel Plan (pre-occupation)</li> <li>• S106 Healthy Streets contribution (£140,360)</li> <li>• Cycle parking details (pre-occupation)</li> <li>• All car parking spaces to be leased, not sold</li> <li>• Permit-free obligation for future residents</li> <li>• Road Safety Audit for the proposed pedestrian crossing</li> <li>• Motorcycle parking at 5% of car parking provision</li> </ul>	<p>Condition 28 - Demolition Management, Logistics Plan and Environmental Management Plan</p> <p>Condition 34 - North Hyde Road Pedestrian Crossing (Road Safety Audit)</p> <p>Condition 36 - Landscape Scheme (including parking provisions)</p> <p>Condition 48 - Delivery, Servicing and Waste Management Plan</p> <p>Condition 49 - Travel Plans</p> <p>Condition 50 - Parking Design and Management Plan</p> <p>The following S106 obligations are also proposed to be secured:</p> <p>vi. Section 278 Highways Agreement for North Hyde Road crossing</p> <p>vii. Hillingdon Council Active Travel Zone / Healthy Streets Contribution</p> <p>viii. Transport for London Contributions</p> <p>ix. Residential Parking Permit Restrictions</p>
<p><b>Air Quality Officer:</b></p> <p>No objection is raised subject to:</p> <ul style="list-style-type: none"> <li>• Securing the £174,299 S106 air quality contribution.</li> </ul>	<p>The Air Quality Officer comments are noted and taken into consideration as part of the planning assessment.</p> <p>The following Conditions are proposed to be secured:</p>

<ul style="list-style-type: none"> <li>• Imposing air quality conditions to manage construction and operational impacts.</li> <li>• Addressing outstanding construction and commercial emission impacts at Reserved Matters stage.</li> </ul>	<p>Condition 18 - Non-Road Mobile Machinery</p> <p>Condition 28 - Demolition Management, Logistics Plan and Environmental Management Plan</p> <p>Condition 53 - Low Emission Strategy</p> <p>The following S106 obligations are also proposed to be secured:</p> <p>iii. Air Quality Mitigation Contribution</p>
<p><b>Noise Officer:</b></p> <p>Sufficient information has been provided by the Applicant to make a recommendation on noise. It is recommended that no objection is made on noise grounds subject to the inclusion of suitable conditions which should be met based on the design information provided and considering measurement and prediction uncertainty.</p>	<p>The Noise Officer comments are noted and taken into consideration as part of the planning assessment.</p> <p>The following Conditions are proposed to be secured:</p> <p>Condition 11 - Operation Hours</p> <p>Condition 12 - Servicing Hours</p> <p>Condition 14 - Noise (Plant Noise Mitigation)</p> <p>Condition 15 - Noise (Sound Insulation of Building)</p>
<p><b>Contaminated Land Officer:</b></p> <p>No objection subject to a condition which secures further details, including a remediation strategy.</p>	<p>The Contaminated Land Officer comments are noted and taken into consideration as part of the planning assessment.</p> <p>Condition 29 is proposed to be secured.</p>

<p><b>Flood and Water Management Specialist:</b></p> <p>No objection subject to a condition which secures further details, including a drainage strategy.</p>	<p>The Flood and Water Management Specialist comments are noted and taken into consideration as part of the planning assessment.</p> <p>Conditions 43 and 44 are proposed to be secured.</p>
<p><b>Waste Strategy Officer:</b></p> <p>The Council's Waste &amp; Recycling Team has identified points of clarification in order to ensure that the development is serviceable and compliant. The points relate to:</p> <ul style="list-style-type: none"> <li>• Swept Path Analysis</li> <li>• Food Waste Bin Capacity</li> <li>• Bulk Bin Specifications</li> <li>• Waste Capacity Calculations (Block A)</li> <li>• Bin Store Design Requirements</li> </ul>	<p>The Waste Strategy Officer comments are noted and taken into consideration as part of the planning assessment.</p> <p>Condition 48 is proposed to be secured.</p>
<p><b>Economic Development Officer:</b></p> <p>From an economic development perspective, we are supportive of this application and would expect the applicant to submit a construction employment training scheme prior to commencement on site.</p> <p>We would also expect the end user (commercial phase) to deliver a local employment scheme once the construction phase is completed.</p> <p>We would expect both requirements to be included in the section 106 agreement for this scheme.</p>	<p>The Economic Development Officer comments are noted and taken into consideration as part of the planning assessment.</p> <p>S106 HoT x is proposed to be secured.</p>
<p><b>Viability Consultant (Third Party):</b></p> <p>We have undertaken an assessment of the proposed Development with 100% private housing, as proposed by the Applicant. We have concluded that the proposed Development with 100% private housing</p>	<p>The Viability Consultant comments are noted and taken into consideration as part of the planning assessment.</p>

generates a deficit against the viability benchmark.	S106 HoT i is proposed to be secured.
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## 7 Planning Assessment

### Land Use Principles

#### *Loss of Offices*

- 7.1 The application site is occupied by two office buildings and one multi-storey car park. These buildings are proposed to be demolished and replaced with a residential development (Class C3), comprising up to 673 residential units and 368m<sup>2</sup> of flexible commercial / community space.
- 7.2 Policy E1(I) of the London Plan (2021) supports the loss of surplus office space to housing provided that the conditions set out under parts G and H of the policy are met. Part G requires the applicant to take into account the need for a range of suitable workspace, including lower cost and affordable workspace; and Part H requires the re-use of surplus large office spaces for smaller office units to be explored.
- 7.3 Policy DME 2 of the Hillingdon Local Plan: Part 2 (2020) states that proposals which involve the loss of employment floorspace or land outside of designated employment areas will normally be permitted if: iv) The new use will not adversely affect the functioning of any adjoining employment land.
- 7.4 The application is supported by a Marketing Review of the office leasing market in Hayes. The total stock covered by the review is circa 511,000m<sup>2</sup> of office floorspace and approximately 14.5% of this is vacant. The review concludes that vacancy levels are expected to remain high with headline rents to fall or stagnate in the short to medium term. With respect to HPH2 and HPH5, both have been extensively marketed with HPH5 currently empty and HPH2 is 65% occupied prior to June 2025.
- 7.5 Significantly, the existing offices are not located within a sequentially preferable location, i.e. a town centre location. It is also noted that the site is not protected in the Hillingdon Local Plan as a Locally Significant Employment Location. As above, HPH2 and HPH5 are under-occupied and despite refurbishment and marketing, there has been limited interest in the buildings. The proposal is considered to comply with Part (iv) of Policy DME 2. It is also noted that the proposed development would include flexible commercial / community floorspace and as a result, the proposal would not result in a complete loss of employment floorspace.

#### *Commercial Use (including Retail)*

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- 7.6 Policy E9 of the London Plan (2021) supports convenience retail in town centres and Policy SD6 requires that vitality and viability is promoted in such locations, including commercial use and housing-led (mixed-use) intensification to optimise residential growth potential.
- 7.7 Policy SD7 of the London Plan (2021) states that development proposals should:
- 1) ensure that commercial floorspace relates to the size and the role and function of a town centre and its catchment
  - 2) ensure that commercial space is appropriately located having regard to Part A and B above, and is fit for purpose, with at least basic fit-out and not compromised in terms of layout, street frontage, floor to ceiling heights and servicing
  - 3) support efficient delivery and servicing in town centres including the provision of collection points for business deliveries in a way that minimises negative impacts on the environment, public realm, the safety of all road users, and the amenity of neighbouring residents
  - 4) support the diversity of town centres by providing a range of commercial unit sizes, particularly on larger-scale developments.
- 7.8 The land use parameter plan submitted indicates the provision of ground floor flexible commercial / community units which could be used for Class E(a) retail, E(b) food and drink, E(e) medical or health services, E(f) nursery, E(g)(i) offices, F.2(a) shop with essential goods, F.2(b) hall or meeting place for local community. There are notable design benefits to activating the Gateway space between Blocks A1 and A2 with these uses. In land use terms, it is noted that the proposed development is replacing an existing town centre use in a non-town centre location. As such, the net retail impact on local town centres, including Hayes Town Centre, is considered to be limited and is accepted on balance. It is also noted that new residents will provide further support for local traders and the vitality and viability of the town centre.
- 7.9 Condition 46 is proposed to ensure that the Phase 1 residential units are not occupied until the commercial space has been completed to at least Category A fit-out standard. If the Phase 1 commercial space has not been occupied within 8 months of the occupation of the Phase 1 residential units, the commercial space shall be fit out to at least Category A+ standard within 12 months of the occupation of the Phase 1 residential units. Conditions 8, 9, 11 and 12 would also ensure that the proposal integrates with the wider residential scheme.

#### *Employment*

- 7.10 As the occupation type of the commercial space is uncertain, the number of employees generated by the development is not certain. It will generate employment and that principle is considered positively.
- 7.11 Policy E11 of the London Plan (2021) states that development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including

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through Section 106 obligations where appropriate. In accordance with this, the Council's Planning Obligations Supplementary Planning Document (2014) requires that developments with estimated construction costs of over £2 million and a construction period of three months or more deliver an in-kind employment and training scheme or financial contributions towards training and employment in the borough. An employment strategy and construction training scheme is proposed to be secured by a S106 legal agreement.

### *Economy*

- 7.12 Paragraph 85 of the NPPF (2024) states that significant weight should be placed on the need to support economic growth and productivity. It is agreed that there would be economic benefits arising from the proposed scheme, including but not limited to the provision of some commercial space in Blocks A1 and A2, and weight is afforded to such benefits.

### *Residential*

- 7.13 Policy GG4 of the London Plan (2021) requires planning and development activity to boost housing delivery by ensuring more homes are built, supporting the strategic goal that 50% of new homes are genuinely affordable, and creating mixed, inclusive communities with high quality homes tailored to identified needs, including specialist housing; it also calls for a diverse range of sites to be allocated to increase local supply and support precision manufacturing methods, with necessary infrastructure planned from the outset, and for ambitious, achievable build-out rates to be set at planning stage so homes are delivered quickly and not used for land value uplift. Policy H1 (Housing Growth) of the Hillingdon Local Plan: Plan 1 - Strategic Policies (2012) requires that the borough meets and exceed its minimum strategic dwelling requirement in accordance with other Local Plan policies. The Borough's target was increased as part of the London Plan (2021).
- 7.14 The proposed development would deliver a mix of units and will contribute to the delivery of housing within the borough. The NPPF encourages the effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring safe and healthy living conditions.
- 7.15 The re-use of sustainably located brownfield land for residential flats accords with the local, regional and national planning policies. The delivery of additional residential units within the Pinkwell ward, close to Hayes Town Centre, which now benefits from the new Elizabeth line connection just 500m away (equivalent to an 8 minute walk) is supported in general terms, subject to compliance with other policies in the development plan. The proposal for new build residential units is also supported as there are limitations to converting the existing buildings, including the floorplates which would not lend themselves for optimising the quality and number of units achievable.

### *Density*

- 7.16 Policy DMHB 17 of the Hillingdon Local Plan: Part 2 (2020) states that all new residential development should take account of the Residential Density Matrix contained in Table 5.2. Paragraph 5.67 of the Hillingdon Local Plan: Part 2 (2020) states that Hillingdon will apply the density standards set out in the London Plan in a flexible manner, according to local circumstances. Large parts of the borough, including many areas in proximity to town centres, are suburban in character and will lean heavily towards the applications of lower to mid-range density scales. Table 5.2 represents a starting point for discussions on the issue of residential density, which should ultimately be determined by a design led approach.
- 7.17 Policy D3 (Optimising Site Capacity through the Design-led Approach) of the London Plan (2021) further requires all development to make the best use of land following a design-led approach that optimises the capacity of sites, including site allocations and offers no density matrix figures. The policy further states that higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.
- 7.18 The area surrounding the site is mixed in character. There is an established suburban character with low-rise residential properties located to the north, south and west. The site is also located within a commercial estate, within close proximity to the west of Hayes Town Centre and has a good PTAL rating of 4, characteristics more akin to an urban setting. If suburban/urban density guidelines are applied, Table 5.2 states that the density should be between 200-510 habitable rooms per hectare. Based on the illustrative proposal, the development would provide 1,787 habitable rooms with a site area of 3.17 hectares, equating to a density of 564 habitable rooms per hectare. This exceeds the density matrix attached to Policy DMHB 17.
- 7.19 It is noted that these standards are only intended as a guide and density guidance has largely been superseded by the design-led approach taken by Policy D3 in the latest London Plan (March 2021). The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth and existing and planned supporting infrastructure. The policy then goes on to highlight the relevant considerations which would contribute to defining an appropriate density such as site context, amenity considerations etc. These aspects of the proposal are considered in detail within the relevant sections of this report.

#### *Housing Mix*

- 7.20 The London Plan (2021) outlines in Policy H10 that schemes should generally consist of a range of unit sizes and sets out a number of factors which should be considered when determining the appropriate housing mix on a particular scheme. This includes local evidence of need. Policy DMH 2 of Hillingdon Local Plan: Part 2 (2020) requires the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest

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information on housing need. Paragraph 4.6 outlines that there is a substantial borough-wide requirement for larger affordable and private market units, particularly three bedroom properties.

- 7.21 In terms of factors specific to a site, Policy H10 also includes a need to consider the mix of uses in the scheme, the range of tenures in the scheme and the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity.
- 7.22 Family housing is defined within the glossary of the London Plan and outlines it must generally be of a size that has three or more bedrooms. It is worth noting that the Secretary of State directed changes to Policy H10, in order to address the need for new family housing, to prevent families from being forced to move outside of London. These changes are incorporated into the London Plan (2021).
- 7.23 Whilst the illustrative scheme proposes 650 units, as all matters are reserved, the Outline Planning application technically proposes up to 673 units. The illustrative scheme scenario is summarised in Table 6 below. Please be advised that these are indicative rather than fixed.

**Table 6. Illustrative Scheme Unit Mix Breakdown**

<b>Unit Type</b>	<b>Total Units</b>	<b>% of Total Units</b>
Studio	4	44.0%
1 Bed 2 Person	282	
2 Bed 3 Person	62	40.6%
2 Bed 4 Person	202	
3 Bed 5 Person	100	15.4%
<b>Total Units</b>	<b>650</b>	<b>100%</b>

- 7.24 A higher proportion of one and two bed units are generally more appropriate in locations within or close to town centres and with high public transport access. Notwithstanding, the circa 15% provision of family units contributes positively to family housing need within the borough.
- 7.25 Whilst the illustrative scheme may contribute positively to meet family housing need, it should be caveated that the application is for Outline Planning Permission and as such, the parameters of the proposal would allow for a different number of units overall with a different unit mix. Notably, the Planning Statement submitted states that up to 673 units are proposed. In order to ensure that the development would continue to contribute positively to family housing need, Condition 6 is proposed to ensure that a minimum of 15% family sized units will be delivered as part of the development to be considered at the Reserved Matters stage.

## *Affordable Housing*

- 7.26 As per Policy DMH 7 of the Hillingdon Local Plan (2020) and Policies H5 and H6 of the London Plan (2021), the development will need to provide affordable housing. Policy DMH 7 states that development with a capacity to provide 10 or more units will be required to maximise the delivery of on site affordable housing. Subject to viability, and if appropriate in all circumstances, a minimum of 35% of all new homes on sites of 10 or more units should be delivered as affordable housing, with a tenure split of 70% social/affordable rent and 30% intermediate, as set out in Policy H2 of the Hillingdon Local Plan: Part 1 (2012). Where an application does not meet the requirements set out in Policy H5, Part C, of the London Plan (2021) it must follow the viability tested route. Policy H4, Part B, of the London Plan (2021) also states that affordable housing should be provided on site and only provide off site or as a cash in lieu contribution in exceptional circumstances. This is supported by Policy DMH 7.
- 7.27 The scheme has been subject to viability testing by the Council's third-party consultants and the GLA. Following such assessment, it has been concluded that a 100% private market scheme generates anywhere between a significant-to-marginal deficit. Further, a 20% affordable housing scheme which benefits from grant funding and CIL relief would also generate a deficit but is within the range of deliverability. The viability appraisal has been sensitivity tested, and it is concluded that only on the basis that construction costs are reduced (to levels not agreed by the Applicant), in combination with a growth in the value of the units or a reduction in agreed profit levels (also not agreed by the Applicant), does the development generate a surplus. Please see Table 7 for a summary of each party's viability position, including the Applicant, the Council and the GLA.

**Table 7. Summary of Viability Appraisal Results**

	Surplus (+) / Deficit (-)
<b>Scenario 1: 100% Private Market</b>	
Applicant	-£36,931,537
Council	-£15,387,009
GLA	-£197,000
<b>Scenario 2: 20% Affordable Housing with Reduced Construction Costs, Grant Funding and CIL Relief</b>	
Applicant	-£6,055,398
Council	-£5,514,008

- 7.28 It is evident that there are significant viability challenges for the proposed development. Officers consider that grant funding would serve to improve the viability of the scheme as a whole and increase deliverability. As such, it has been agreed that the S106 legal agreement will secure provisions to obligate the developer to carry out all reasonable endeavours to secure grant funding so that on site affordable housing can be maximised. Should it be sufficiently evidenced, in agreement with the Council, that all reasonable endeavours have been

exhausted and that no grant funding has been secured to realise affordable housing provision, the scheme would revert to 100% private market housing.

- 7.29 Given the significant viability constraints on the proposed scheme, it is concluded that the proposed conditional cascade mechanism would realise the maximum amount of affordable housing possible, especially given the announcement of the GLA's emergency measures for housebuilding which have been introduced to accelerate housebuilding, unlock stalled sites and provide housebuilders with more certainty by improving both the viability and deliverability of residential schemes. The conditional affordable housing cascade mechanism is proposed to be secured under S106 HoT (i) and includes viability review mechanisms to capture changes in viability over the lifetime of the multi-phase residential development. This is the reasonable and robust evidence based position, which is considered, on the balance of probabilities, to realise sufficient public benefit by maximising the likelihood of affordable housing delivery.

### Design

- 7.30 This application seeks Outline Planning Permission (with all matters reserved excluding access) for demolition of existing buildings (above basement level) and phased delivery of residential development (Class C3), flexible commercial / community floorspace, new public realm, landscaping, play space, car parking, cycle parking and associated works. The illustrative scheme proposes the construction of 8 blocks and 2 rows of townhouses up to 11 storeys to provide 650 units (and up to 673 units maximum), with circa 368m<sup>2</sup> of flexible commercial / community floorspace (including E(a) retail, E(b) food and drink, E(e) medical or health services, E(f) nursery, E(g)(i) offices, F.2(a) shop with essential goods, F.2(b) hall or meeting place for local community).
- 7.31 More specifically, the development comprises five main residential blocks (including 8 sub-blocks), including Blocks A1 and A2 within the northern section of the site abutting North Hyde Road, Block B within the centre of Hyde Park Hayes, Block C to the south-western corner of the site and Block D to the south-eastern corner of the site.
- 7.32 Three communal public spaces are proposed, named the Gateway, Social Heart and the Nurture Garden. The Gateway space would provide access through the northern part of the site from North Hyde Road, a space which is envisaged to be activated by the flexible commercial / community units proposed at the ground level of Blocks A1 and A2. The Social Heart connects to this space, sitting between Block A, Block B and HPH1. This space would provide amenity space with a more residential focus, being set further within the site and away from the active Gateway space. The Nurture Garden is set even further within the site, between Block B, Block C, Block D and HPH1. Again, the function of this space is envisaged to be more residential in nature. All spaces would be publicly accessible but would invariably provide benefit to future residents in the form of amenity provision.

7.33 During the application process, amended Parameter Plans, Design Code and illustrative scheme plans were submitted in response to feedback from the Council. The updated Parameter Plans refined the scheme, including minor shifts to the building zones to improve layout and movement, enhancements to pedestrian priority and traffic calming through revised access arrangements, increased landscape and open-space provision (particularly around Block B) and a reduction in massing to the northern end of Block B1. Additional Class E floorspace is now focused at the gateway to strengthen activation, while tree retention has improved through repositioning of Blocks A2 and D. Corresponding updates to the Illustrative Masterplan reflect these changes, including an adjusted residential mix, enhanced ground-floor uses, and reconfigured cycle storage.

#### *Tall Building*

7.34 If the development was to be considered a tall building, it is noted that the site is not located within Uxbridge or Hayes Town Centres which are the only areas identified within Policy DMHB 10 of the Hillingdon Local Plan: Part 2 (2020) as appropriate locations for such buildings. Notwithstanding whether it is located appropriately in policy designation terms, as set out within Policy D9 of the London Plan (2021), the visual, functional, environmental and cumulative impacts are relevant considerations.

7.35 Given that the development would exceed 6 storeys and 18m in height, and would notably change the townscape skyline, it is concluded that the proposed development is a tall building for the purposes of Policy D9.

7.36 In locational terms, whilst the development is not located within the Uxbridge and Hayes Town Centres which are identified as suitable for tall buildings, it is located within close proximity to Hayes Town Centre where development should be optimised. As such, the site is considered an appropriate location for a sensitively and sustainably designed tall building.

7.37 The Heritage, Townscape and Visual Impact Assessment (HTVIA) evaluates the proposed redevelopment of the Hyde Park Hayes site. The study confirms the site contains no heritage assets and makes no contribution to the significance of nearby designated and locally listed assets, including Enterprise House and the Botwell Thorn EMI Conservation Area, which lie north of the railway line. Visibility of the proposals from these assets is limited to peripheral, glimpsed views and occurs within an already evolving context of large-scale regeneration, resulting in no significant harm to their significance. The proposal would incorporate varied building heights, improved permeability and open spaces. Visual assessments across 23 verified viewpoints show that whilst the development increases built form in some views, it does so within a setting already characterised by mixed scales and emerging tall buildings. Subject to the controls set out within the Parameter Plans and Design Code, Officers agree that the proposal would not be significantly harmful in respect of townscape and visual impacts.

- 7.38 Several of the considerations outlined within Policy D9 are considered elsewhere within the report. Design and visual impacts are considered in the section starting at paragraph 7.41 of this report and heritage is considered in paragraphs 7.91. Impact on the local highway network is considered in the section starting at paragraph 7.134 of this report. Impact on amenity is considered in the sections beginning at paragraphs 7.53 (*Residential Quality*) and 7.59 (*Residential Amenity*) of this report. The consideration of airport safeguarding is addressed in paragraphs 8.1 and 8.2 of this report. Paragraphs 7.81 to 7.85 of this report addresses security, the sections starting at paragraphs 7.53 (*Residential Quality*) and 7.59 (*Residential Amenity*) considers daylight and sunlight and paragraphs 7.86 to 7.88 of this report addresses fire safety.
- 7.39 Whilst a microclimate or wind assessment has been submitted to support the application, it does not go as far as confirming the specific mitigations measures necessary to achieve the best conditions possible within reason. It is conceivable that the development can achieve acceptable conditions. Subject to Condition 24 which requires the submission of a detailed microclimate and wind assessment, the proposal is considered to accord with the requirements of Policy D9.
- 7.40 To conclude, the proposal meets the definition of a tall building. The illustrative scheme is considered to broadly comply with the requirements set out within Policy D9 of the London Plan (2021) and the detailed scheme to be submitted at the Reserved Matters Stage has sufficient potential to comply with the policy requirements.

*Impact on the Character and Appearance of the Area*

- 7.41 Policies D3 of the London Plan (2021), BE1 of the Hillingdon Local Plan: Part 1 (2012), DMHB 11 and DMHB 12 of the Hillingdon Local Plan: Part 2 (2020) are all directly relevant to the proposal. These policies can be read in full in the Committee Report Part 3 - Policy Appendix, and in summary, seek to secure a high quality of design that enhances and contributes to the area in terms of form, scale and materials, is appropriate to the identity and context of the townscape and would improve the quality of the public realm and respect local character. These aims are also supported by the NPPF (2024) at chapter 12.
- 7.42 Whilst a detailed set of plans for a 650 units residential scheme have been submitted, it is important to note that the scheme is in Outline and as such, the illustrative scheme only serves as a proof of concept to inform detailed design discussion at the Reserved Matters stage should the Outline Planning application be approved. Accordingly, the Parameter Plans and Design Code set out the parameters and design rules which the detailed scheme for Reserved Matters must accord with.
- 7.43 More specifically, the revised Parameter Plans (dated December 2025) define the maximum building footprints and separation distances (Plan 1), the access and movement structure including the primary pedestrian route, vehicular access points, service street and new North Hyde Road crossing (Plan 2), and the

distribution of open spaces, SuDS areas, front gardens and tree retention/removal (Plan 3). They set the maximum building heights and parapet levels across all blocks, including accent building locations (Plan 4), allocate land uses with a residential-led mix and defined Class E/F2 areas (Plan 5), and provide a detailed tree strategy showing tree zones, constraints and coordinated planting above basements (Plan 6). The 3D massing envelope illustrates how these height limits apply spatially, while the basement plan fixes the extent of the existing and permissible basement footprint (Plan 8). Collectively, the Parameter Plans establish the limits of development, increasing the likelihood of a high quality scheme being delivered on site.

7.44 The revised Design Code (dated December 2025) provides a framework to secure high quality design across the development, setting rules for building heights, massing, layout, materials, and architectural character, alongside a strong landscape-led approach centred on the Gateway, Social Heart and Nurture Garden. It mandates active frontages, high quality public realm, generous pedestrian and cycle routes, tree-lined streets, SuDS features, biodiverse roofs, and delivery of both the Urban Greening Factor (0.4) and 10% Biodiversity Net Gain. Parking is contained within podiums or the existing basement to minimise vehicle dominance, while standards for play space, refuse storage, cycle parking and servicing should ensure provision of functional amenity spaces.

7.45 Regarding character and appearance, the Design Code draws on local influences, including Metroland, Modernist, Art Deco and industrial heritage, to define an architectural language. Rules are set to require the development to respond to the site's context and history (DC 4.13). Building frontages are required to be active and visually engaging (DC 3.04), with façades articulated through window patterns, entrances (DC 4.19, 4.20, 4.23-4.26), balconies (4.31-4.34), material detailing and a clear base–middle–top expression (DC 4.15). Materials must be durable (DC 4.36), predominantly brick or masonry (DC 4.17), with varied tones, bonds and textures to add richness while avoiding overly glazed or metal-clad façades (DC 4.14). Balconies must be integral to the façade composition, using solid upstands and avoiding glazed balustrades, with inset or projecting forms used to create depth, visual interest and privacy (DC 4.31-4.34). Windows must use timber or aluminium frames, avoid excessive full-height glazing unless opening to a balcony, provide raised sills for privacy and comfort, and incorporate shading to mitigate overheating (DC 4.39–4.44). Blank façades must be minimised and, where unavoidable, treated through material changes, recesses, landscape buffers or public art (DC 4.35-4.38). Wayfinding and signage must be integrated into building design using a holistic, legible strategy that avoids visual clutter (DC 4.45-4.48). Bay windows may be used to articulate façades, enhance daylighting and improve passive surveillance, provided they are fully integrated into the building's architectural character (DC 4.49–4.50). Taken together, these provisions ensure the development delivers a distinctive, visually coherent and contextually grounded neighbourhood.

7.46 With respect to the scheme overall, the Council's Urban Design Officer has confirmed that the changes made during the application process are generally

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welcomed and supported in principle. However, concerns were raised regarding the size, quality and functionality of the proposed open spaces, including doubts over the feasibility of the tree planting proposals.

- 7.47 With respect to the Parameter Plans and Design Code, the Council's Design Officer notes that the parameter plans fix building footprints and heights to deliver a high-density scheme, without sufficient evidence that the spaces between buildings can deliver a high quality public realm. They also note that the public realm is expected to accommodate multiple functions (open space, play, SuDS, servicing, BNG and UGF) without tested layouts demonstrating that these elements can successfully co-exist. The Design Officer considers the Design Code to lack certainty needed to secure quality outcomes and defers critical design decisions, resulting in an approach that appears aspirational rather than demonstrably deliverable.
- 7.48 The Design Officers comments are taken into consideration as part of the overall planning assessment. In particular, Officers consider that successful Design Codes should be clear, concise and visual, focusing on the key parameters that shape successful places (such as form, layout, landscape and street character), rather than prescribing detailed architectural style.
- 7.49 Guidance documents include the National Model Design Code (2021), National Design Guide (2021, updated 2025), Creating a Design Code (PPG) (2023 update) and the Draft Design and Placemaking Planning Practice Guidance (PPG) (dated January 2026). Specifically, the Draft Design and Placemaking PPG (January 2026) makes clear that effective design codes must be “simple, concise and specific” and must “provide developers certainty of what will be accepted,” while at the same time “allow[ing] flexibility and a suitable degree of variety, creativity and innovation” (para. 278). The guidance emphasises that design codes are intended to support predictable, efficient decision-making by setting clear, measurable and visually-defined parameters, rather than imposing unnecessary prescription (paras. 278–280). It further confirms that the scope and level of detail in a code must be proportionate to the context and scale of development, ensuring that codes provide clarity and consistency while still enabling design responses tailored to local character and changing circumstances (paras. 249–250, 256).
- 7.50 Officers note that overly restrictive or overly detailed codes do not necessarily deliver better outcomes. Instead, successful codes balance firm spatial requirements ('musts') with adaptable guidance ('shoulds'), ensuring deliverability, encouraging innovation, and enabling high quality design to evolve through future Reserved Matters applications.
- 7.51 As set out within paragraphs 7.43 to 7.45 above, the Parameter Plans and Design Code set out a comprehensive set of design rules and controls. Officers consider these plans and documents to strike a reasonable balance in respect of best practice requirements, in terms of setting clear design requirements whilst also allowing flexibility for creativity and innovation. However, Officers also appreciate the concerns raised by the Design Officer in respect of certain design

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features being potentially more aspirational than demonstrably deliverable. Whilst the public realm and landscape scheme proposals will require specific detailed design scrutiny, there is sufficient scope for these matters to be resolved at the Reserved Matters stage. Accordingly, it has been agreed with the Applicant that a final detailed Design Code shall be secured by Condition 22 and shall address concerns over feasibility and deliverability of a high quality development.

- 7.52 The final detail of materials, landscape scheme, public art, and play spaces are proposed to be secured by Conditions 35, 36, 37, and 38 to ensure the delivery of high quality development.

#### *Residential Quality*

- 7.53 Policy DMHB 16 of the Hillingdon Local Plan: Part 2 (2020) states that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment.
- 7.54 Policy D6 of the London Plan (2021) states that housing development should be of high quality design and provide adequately sized rooms. Table 3.1 requires the following:
- One storey 1-bed 1 person unit: minimum 39 square metres Gross Internal Area (GIA) with a bathroom (or 37 square metres with shower room);
  - One storey 1-bed 2 person unit: minimum 50 square metres GIA;
  - One storey 2-bed 3 person unit: minimum 61 square metres GIA;
  - One storey 2-bed 4 person unit: minimum 70 square metres GIA;
  - One storey 3-bed 4 person unit: minimum 74 square metres GIA; and
  - One storey 3-bed 5 person unit: minimum 86 square metres GIA.
- 7.55 As the scheme is in Outline, the proposal comprises the following housing mix parameters:
- 1 bed units: 20-45%
  - 2 bed units: 30-45%
  - 3+ bed units: At least 15%
- 7.56 Based on the illustrative scheme, it is feasible for the scheme to deliver 650 units which meet the minimum internal floorspace standards. As per the Design Code rules DC 3.27 and DC 4.02, the illustrative scheme is committed to delivering at least 60% of homes as dual aspect, including delivery of all family units as dual aspect. It is also noted that the illustrative scheme specifically delivered 75% of units as dual aspect and would be the aspiration for an application for approval of Reserved Matters.
- 7.57 Paragraph 130, part c) of the NPPF (2024) is noted and states that when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site (as long as the resulting scheme would provide acceptable living standards). A Daylight and Sunlight Assessment has been submitted and independently assessed by the Council's

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third-party consultants who have confirmed that the internal light provisions are within the parameters of acceptability, especially given the urban context of the scheme.

- 7.58 Given the above considerations, the proposed residential flats are considered to provide a sufficient level of quality of accommodation.

*Amenity Space*

- 7.59 The London Plan (2021) requires the provision of a minimum 5m<sup>2</sup> of private outdoor space for 1-2 person dwellings and an extra 1 sq.m. should be provided for each additional occupant.

- 7.60 The Hillingdon Local Plan: Part 2 (2020) requires more amenity space provision than that specified in the London Plan (2021). Policy DMHB 18 of the Local Plan: Part Two (2020) requires new developments to provide good quality and usable private outdoor amenity space in accordance with the standards set out in Table 5.3. In summary, each unit type should provide at least the following levels of amenity space:
- 1 bedroom flats: 20m<sup>2</sup>
  - 2 bedroom flats: 25m<sup>2</sup>
  - 3 bedroom flats and larger: 30m<sup>2</sup>
  - 1 bedroom houses: 40m<sup>2</sup>
  - 2 bedroom houses: 60m<sup>2</sup>
  - 3 bedroom houses and larger: 100m<sup>2</sup>

- 7.61 Based on the illustrative scheme, it is assessed that the development would provide 7,544m<sup>2</sup> of private amenity space, and 2,483m<sup>2</sup> of communal amenity space. Please see Table 8 below for a breakdown of the amenity space provision.

**Table 8. Breakdown of Amenity Space Provision**

Type	Area (m <sup>2</sup> )
<b>Communal</b>	
Communal terrace block B podium	589
Communal terrace block D podium	782
Communal terrace block B3 roof	565
Communal terrace block B1 roof	150
Communal terrace block C roof	124
Communal terrace block D1 roof	150
Communal terrace block D2 roof	123
Sub-total	2,483
<b>Private</b>	
Balcony (projecting and inset)	4,155
Private front garden (ground)	1,436
Private roof terrace	1,953
Sub-total	7,544
<b>Total</b>	<b>10,027</b>

7.62 Based on the illustrative scheme of 650 units and associated unit mix, the development would be required to provide 4,016m<sup>2</sup> of amenity space under London Plan (2021) requirements and 15,740m<sup>2</sup> of amenity space under Hillingdon Local Plan: Part 2 (2020) requirements. The calculations are set out below for reference.

The London Plan (2021) requires:

- Studio and 1-bedroom 2 person flats: 286 x 5m<sup>2</sup> = 1,430m<sup>2</sup>
- 2-bedroom 3 person flats: 62 x 6m<sup>2</sup> = 372m<sup>2</sup>
- 2-bedroom 4 person flats: 202 x 7m<sup>2</sup> = 1,414m<sup>2</sup>
- 3-bedroom 5 person flats: 94 x 8m<sup>2</sup> = 752m<sup>2</sup>
- 3-bedroom 5 person townhouses: 6 x 8m<sup>2</sup> = 48m<sup>2</sup>
- Total: 4,016m<sup>2</sup>

The Hillingdon Local Plan: Part 2 (2020) requires:

- 1-bedroom flats: 286 x 20m<sup>2</sup> = 5,720m<sup>2</sup>
- 2-bedroom flats: 264 x 25m<sup>2</sup> = 6,600m<sup>2</sup>
- 3-bedroom flats: 94 x 30m<sup>2</sup> = 2,820m<sup>2</sup>
- 3-bedroom townhouses: 6 x 100m<sup>2</sup> = 600m<sup>2</sup>
- Total: 15,740m<sup>2</sup>

7.63 The proposed development would significantly exceed the London Plan (2021) requirements by 6,011m<sup>2</sup> (49.7% uplift) but would fall short of the Hillingdon Local Plan: Part 2 (2020) requirements by 5,713m<sup>2</sup> (36.3% shortfall). In terms of quantity, the proposal would therefore accord with the London Plan (2021) and conflict with the Hillingdon Local Plan: Part 2 (2020).

7.64 In terms of quality, the Design Code sets out standards for front gardens and defensible space to ensure high residential amenity, strong street character and appropriate levels of privacy for ground-floor occupants. These provisions form an important component of the site-wide public realm strategy and are secured by the Design Code rules DC 1.59 to DC 1.62. Podium courtyard provisions are also secured by rules DC 1.63 to 1.65.

7.65 Specifically, front gardens and defensible space should cover at least 75% of each building façade and be 2–3m deep to provide suitable privacy for ground floor homes (DC 1.59). Boundaries must be no higher than 900mm, with high fences prohibited, and residents prevented from installing their own fencing; instead, hedges or tall planting are encouraged to strengthen privacy while maintaining an open street character (DC 1.60). Boundary treatments may combine low solid walls with metal railings up to 900mm, and all front gardens must include gates of matching design that provide wheelchair accessible entry (DC 1.61). The threshold between private gardens and the public realm should incorporate landscape buffering such as hedging, with responsibility for long term maintenance placed on the landlord or management company to ensure consistency of appearance (DC 1.62). Within podium courtyards, where soil

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depth is restricted, designs must provide appropriate planting solutions, including raised planters, landforming, and dedicated tree pits, to allow meaningful greenery and small trees to establish successfully (DC 1.63). Private gardens in podium areas must also be of a sufficient size to ensure privacy, again with boundaries limited to 900mm height and no high fences permitted, and a landscaped buffer separating private and communal spaces to reinforce defensible space and amenity quality (DC 1.64). Collectively, these requirements should secure high quality amenity space provision at the Reserved Matters stage of the application process.

- 7.66 Whilst the illustrative scheme would fall short of the Local Plan amenity space standards, this should be viewed reasonably within the context of a high density scheme in a location where higher density residential developments are appropriate. The illustrative scheme would accord with London Plan (2021) requirements and the Design Code would ensure that good quality and usable private outdoor amenity space would be provided. As the scheme is in Outline, it is also feasible that the quantity of amenity space could increase. Subject to securing sufficient and acceptable amenity space provisions at the Reserved Matters stage, the minor conflict with Local Plan standards exhibited by the illustrative scheme (not a detailed scheme) is accepted on balance.

#### *Play Space*

- 7.67 London Plan Policy S4 (2021) requires residential developments to provide good quality, accessible play space for all ages, with a minimum of 10 sqm of play space per child. This space must offer a stimulating environment, be safely and independently accessible from the street, form an integral part of the neighbourhood, incorporate trees or greenery, be overlooked for passive surveillance, and not be segregated by tenure. These requirements are reinforced by the Mayor's SPG Shaping Neighbourhoods: Play and Informal Recreation, which maintains the 10 sqm per child benchmark, requires on site provision for under-fives, and emphasises that play facilities must not be tenure separated. At the local level, Hillingdon Local Plan Part 2 Policies DMCI 5 and DMHB 19 apply the borough's child yield calculations alongside the London Plan standards, including the 10 sqm per child requirement and a 400 metre accessibility standard to equipped play areas. In areas identified as play space deficient, new development is expected to provide additional play provision to meet benchmark standards.
- 7.68 Based on the GLA Population Yield Calculator (v3.2), and using 650 units with example scenarios with either 20% or 0% affordable housing provision, it is anticipated that the following numbers would be yielded from the proposed development:

#### 20% Affordable Housing Scenario:

- 117.7 no. children under the age of 5 years old;
- 81.9 no. children aged 5 to 11 years old;
- 26.1 no. children aged 12 to 15 years old; and
- 13.8 no. children aged 16 to 17 years old.

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- Total: 240 children, requirement 2,400m<sup>2</sup> play space

0% Affordable Housing Scenario:

- 93.7 no. children under the age of 5 years old;

- 62.4 no. children aged 5 to 11 years old;

- 15.6 no. children aged 12 to 15 years old; and

- 8.3 no. children aged 16 to 17 years old.

- Total: 180 children, requirement 1,800m<sup>2</sup> play space

7.69 It is noted that the child yield is dependent on the number of units and the tenure and as such, the yield would need to be recalculated at the Reserved Matters stage. Notably, the affordable housing scenario would require an additional 600m<sup>2</sup> of play space, increasing from 1,800m<sup>2</sup> to 2,400m<sup>2</sup>.

7.70 The illustrative scheme would provide 1,752m<sup>2</sup> of play space and would include the ground floor 'play route', the nurture garden, the social heart, and on roof tops. In terms of quality, the Design Code sets out standards for play space and requires that it is inclusive for all ages and abilities; integrated throughout the site, not limited to designated play areas; supported by joyful planting, varied lighting, robust materials, and multifunctional furniture; designed to encourage incidental, natural and imaginative play. The Design Code rules include DC 1.13 to DC 1.16 and DC 1.65.

7.71 Specifically, the scheme must provide play space in accordance with the GLA child-yield calculation, with the design expected to meet the target of 10sqm per child (DC 1.13). Play facilities for all age groups must be incorporated, with under-5s play prioritised in doorstep locations to ensure ease of access and integration with daily life (DC 1.14). Formal play equipment must be located within the Nurture Garden and the Social Heart, with further play opportunities encouraged between the Gateway and Social Heart (DC 1.15). In addition, incidental and informal play must be embedded along pedestrian routes, green verges and street buffers, provided it does not compromise residential privacy (DC 1.16). Communal play areas are also required to meet strict quality criteria, including having a clear purpose, being overlooked by surrounding development, located to maximise sunlight, positioned away from main roads to ensure safety, and being fully accessible to all tenures and mobility groups, with appropriate management arrangements (DC 1.16). For upper-level amenity spaces, the Code encourages play for 0–5-year-olds on podium courtyards, recognising their safe, enclosed and well-overlooked nature and lower noise sensitivity (DC 1.65). Collectively, these requirements should secure inclusive and high-quality play space at the Reserved Matters stage of the application process.

7.72 Whilst the illustrative scheme would fall short of the play space standards, this should be viewed reasonably within the context of a high-density scheme in a location where higher density residential developments are appropriate. The Design Code would ensure that good quality and usable play space would be provided. As the scheme is in Outline, it is also feasible that the quantity of play space could increase. It is also noted that there are existing parks and play spaces within the area, including Pinkwell Park (14min walk), Prestige

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Playground (16min walk) and Croyde Avenue Playground (16min walk). Subject to securing sufficient and acceptable play space provisions at the Reserved Matters stage, including further details under Condition 38, the minor conflict with standards exhibited by the illustrative scheme (not a detailed scheme) is accepted on balance but could be considered to weigh against the scheme in the planning balance if not resolved at the detailed stage.

### *Public Open Space*

- 7.73 London Plan Policy G4 (2021) requires development proposals to deliver publicly accessible open space, particularly in areas of open space deficiency. Hillingdon Local Plan Part 1 Policy EM4 (2012) seeks to safeguard, enhance and expand the Borough's network of open spaces, supporting carbon capture, active lifestyles and access to open space within walking distance of homes, with a presumption against any net loss of open space. Major developments are expected to contribute to new or improved provision. Complementing this, Hillingdon Local Plan Part 2 Policy DMCI 4 (2020) supports major residential schemes only where they provide new or enhanced open space that meets the needs of future occupiers and helps address deficiencies in quantity, quality or accessibility. New open space should integrate with wider green networks, and in town centres may take the form of civic space. Proposals that fail to provide appropriate, well-located and high quality open space, or that would result in inadequate or unsuitable provision, will be resisted.
- 7.74 Using a 20 square metres per person requirement (based on 2.0 ha per 1,000 people required by London Borough of Hillingdon Open Space Strategy 2011-2026 (July 2011)) and estimated 1,884 occupants (based on 2.8 average household size in Hillingdon (as of 2021 census) to reflect that they will never be full at the same time), the development should provide 37,688m<sup>2</sup> of publicly accessible open space.
- 7.75 The proposed illustrative plans indicate that circa 2,510m<sup>2</sup> of public open space is provided as part of the Gateway, Social Heart and Nurture Garden spaces. The Applicant has also identified a further c. 3,400m<sup>2</sup> of public open space provision, however, the space identified is considered to be more transitional in nature, comprising walkways and landscape buffers. As such, the development is considered to provide 2,510m<sup>2</sup> of public open space, which falls short of the 37,688m<sup>2</sup> target by 35,178m<sup>2</sup> (equivalent to the provision of 1,759 people and 628 residential units).
- 7.76 If sufficient publicly accessible open space cannot be accommodated within the site, a financial contribution is required for the enhancement of local public open spaces. In the context of the proposed development, a contribution is sought for the enhancement of existing public open space in Pinkwell using the methodology set out in the Planning Obligations Supplementary Planning Document (July 2014). For the shortfall, the sum calculated equals a contribution of £879,450.

- 7.77 It is noted that this matter is reserved for later approval and as such, S106 HoT v is proposed to secure a contribution totalling up to £879,450. Should the Council agree that a sufficient high quality open space for each phase is to be delivered, a contribution will not be required. The S106 shall also ensure that all on site public open space allows unfettered access in perpetuity.

#### *Accessibility*

- 7.78 Policy D5 of the London Plan (2021) states that development proposals should achieve the highest standards of accessible and inclusive design.
- 7.79 The Design Code embeds inclusive access throughout the development, ensuring that movement, open spaces and facilities are designed for all users. Open spaces must be fully accessible and support clear wayfinding (DC 1.11), while key public spaces such as the Nurture Garden must provide at least two pedestrian entrances, including one on an active street edge, all of which must be visible, well-lit and DDA-compliant (DC 1.26). Play areas must be accessible to all tenures and mobility groups, safely located, overlooked and positioned to maximise sunlight (DC 1.13-1.16). The movement framework requires a pedestrian-first environment, including minimum footpath widths and shared pedestrian/cycle routes at 4m clear width and well-lit to ensure inclusive access for wheelchairs, buggies and mobility aids (DC 2.09-2.12). Inclusive design principles also apply to streets, which must incorporate raised tables and shared surfaces to improve safety and reduce traffic dominance (DC 2.01-2.04), and to emergency access routes that must maintain unobstructed pedestrian movement (DC 2.23). Front garden gates must be wide enough for wheelchair access (DC 1.61), while cycle and refuse stores must be conveniently located, well-lit and easily accessible (DC 2.17-2.20). Street furniture must support inclusive use, with seating provided every 50m and at least 50% equipped with arm and back rests to aid older people and disabled users (DC 1.78-1.81). Collectively, these provisions ensure that the development delivers a safe, legible and inclusive environment for all residents and visitors.
- 7.80 The proposed development would deliver 10% of units as M4(3) units, in accordance with policy requirements, and is proposed to be secured via Condition 13. Accessible parking bays and their management are proposed to be secured via Condition 50 for a Parking Design and Management Plan. The submission of further detail relating to inclusive design measures is to be secured through the materials Condition 35 and landscape scheme Condition 36.

#### *Secured by Design*

- 7.81 Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) states that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles. This is supported by Policy D11 of the London Plan (2021).

- 7.82 The Design Code embeds principles consistent with Secured by Design, ensuring that the development promotes safety, natural surveillance and crime-resistant design. Communal and public spaces, including play areas and podium courtyards, must be overlooked by surrounding development to maximise passive surveillance (DC 1.16; DC 1.65), while front gardens of 2–3m depth, low boundary treatments of no more than 900mm height, and defensible planting strengthen privacy and territorial definition without creating concealment risks (DC 1.59-1.62). Entrances must be well-lit, glazed, legible and recessed to provide defensible space and reinforce secure access (DC 4.19-4.26), and blank façades must be minimised or otherwise treated with architectural detailing, green walls or public art to avoid creating inactive frontages (DC 4.35-4.38). The Code further requires a site-wide external lighting strategy to ensure safe evening routes and illuminated crossings (DC 1.78-1.81), and mandates secure, well-lit and visually screened refuse and cycle stores, located in overlooked positions and designed to prevent concealment (DC 2.17-2.20). Movement routes must follow pedestrian priority principles, incorporating raised tables, shared surfaces and clear sightlines to improve safety and reduce vehicular conflict (DC 2.01–2.04). Collectively, these provisions align closely with Secured by Design guidance by promoting natural surveillance, defensible space, safe access, secure storage and high quality lighting throughout the scheme.
- 7.83 A secured by design condition has been recommended to achieve appropriate accreditation. Subject to Condition 52, the proposal would accord with Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) and Policy D11 of the London Plan (2021).
- 7.84 During the consultation process, the Metropolitan Police Service (MPS) submitted a request for a package of facilities, financial contributions and operational support measures associated with the proposed development. These comments are recognised as a material consideration as they relate broadly to the issue of ensuring adequate policing capacity and community safety which hold relevance to policy objectives. However, the requests must be assessed against planning policy, established funding responsibilities, and the statutory tests governing planning obligations. These are addressed in turn below:
- **Funding responsibility:** The provision of police infrastructure is not the responsibility of individual developers. The demand for policing and associated equipment arises from the wider population of Hayes and existing communities, including future residents, who contribute to policing services through general taxation, rather than development specific channels.
  - **Existing strategic context:** There is currently no adopted MPS estates strategy that the Council can rely upon to evidence a defined policing infrastructure requirement specific to this location or this development.
  - **Policy prioritisation:** Local Plan Policy DF1 requires that contributions be prioritised towards critical infrastructure such as transport and health. Given the financial viability constraints affecting the scheme, only infrastructure that is essential, evidenced, and compliant with statutory tests can be sought.

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- **Regulation 122 tests:** The requests fail to meet the three legal tests set out in Regulation 122 of the Community Infrastructure Levy Regulations 2010. At the time of the assessment, within the current Planning Policy Framework, the MPS contribution is not considered to meet the CIL tests. This does not mean it will not under future Development Plan Frameworks.

7.85 While the MPS position has been fully considered, the requested obligations do not meet national statutory tests, lack an evidence base, and conflict with the Council’s infrastructure funding priorities and viability position. As such, they cannot lawfully be secured through this planning application at this time.

*Fire Safety*

7.86 Policy D12 of the London Plan (2021) states that all major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor. The statement should detail how the development proposal will function in fire safety terms.

7.87 A Fire Statement has been submitted and demonstrates consideration of fire safety principles early in the development process. The London Fire Brigade and HSE have not raised any specific objections but have advised that the development should accord with Building Regulation requirements. The GLA state that the development proposals would achieve the highest standards of fire safety, including details of construction methods and materials, means of escape, fire safety features and means of access for fire service personnel. The applicant should, however, confirm that the proposed fire appliance access within the landscaped area would not limit the ability of a fire appliance to manoeuvre effectively. It was also noted that buildings with more than 18m height require second stair cores.

7.88 A final Fire Statement is proposed to be secured by Condition 51 and subject to this condition, the proposal would accord with the requirements of Policy D12 of the London Plan (2021).

*Design Conclusion*

7.89 Officers are particularly cognisant of the Government’s Written Ministerial Statement on Planning Reform: Next Phase (18 November 2025). The Statement is given significant weight and confirms a national policy intention to “unleash development around rail stations” by providing a “default yes” to suitable, well-designed development within a reasonable walking distance of well-connected railway and tram stations. The statement emphasises that development of the right quality and density in such locations represents a highly sustainable form of growth, maximising the use of existing public transport infrastructure, reducing car dependency, and supporting housing delivery and economic growth. The Ministerial Statement makes clear that this approach should apply consistently across all local authority areas and is intended to be

embedded within the revised National Planning Policy Framework as a strengthened expression of the presumption in favour of sustainable development. In this context, the application site's proximity to a major rail station represents a material consideration of significant weight, and any assessment of the proposal must give due regard to the Government's clear expectation that sustainably located development adjacent to stations should be supported unless demonstrable harm would clearly outweigh the substantial public benefits identified.

- 7.90 The application has been developed through a comprehensive pre-application process, including Design Review as required by Policy D4 of the London Plan (2021). Whilst issues have been raised by the Council's Design Officer, Officers consider the Outline application, with all matters reserved for later determination, to have sufficient and acceptable potential to deliver a high quality residential scheme to meet the needs of the Borough. Notably, Condition 22 is proposed to secure a revised Design Code and is intended to fine-tune the code in accordance with best practice set out within relevant guidance documents. Subject to such a condition, the development is supported and considered to be acceptable in design terms.

#### Heritage

- 7.91 The application site is not subject to a Conservation Area designation and does not contain any heritage assets, including statutory listed buildings or locally listed buildings.
- 7.92 The Heritage, Townscape and Visual Impact Assessment (HTVIA) evaluates the proposed redevelopment of the Hyde Park Hayes site. The study confirms the site makes no contribution to the significance of nearby designated and locally listed assets, including Enterprise House and the Botwell Thorn EMI Conservation Area, which lie north of the railway line. Visibility of the proposals from these assets is limited to peripheral, glimpsed views and occurs within an already evolving context of large-scale regeneration, resulting in no significant harm to their significance. Officers agree that the proposal would not be significantly harmful to nearby heritage assets.

#### *Archaeology*

- 7.93 Policy DMHB 7 of the Hillingdon Local Plan: Part 2 (2020) states that the Council, as advised by the Greater London Archaeological Advisory Service (GLAAS), will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts.
- 7.94 Although the site does not fall within an Archaeological Priority Area, the submitted desk-based assessment (DBA) concludes that the site has low potential for archaeological remains of any period and that any remains present are likely to be of low (local) significance. The Greater London Archaeological Advisory Service were consulted and advised that this position was not agreed.

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They have, however, agreed that a bespoke stage 1 written scheme of investigation (WSI) can be secured by condition. Subject to Condition 30, the proposal is considered to be acceptable and would accord with the requirements of Policy DMHB 7 of the Hillingdon Local Plan: Part 2 (2020).

### Residential Amenity

#### *Impact on Neighbours*

- 7.95 Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) states that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.
- 7.96 In terms of residential uses, HPH1 is subject to application reference 67351/APP/2024/2746 which granted Prior Approval in April 2025 for change of use from offices to 75 flats. HPH3 has also been the subject of application reference 72360/APP/2021/1709 which granted Prior Approval in September 2021 for the change of use from offices to 113 flats and is now occupied. Further afield, residential properties are located to the north of the site along Keith Road, south along Dawley Road and west along Bourne Avenue, Waltham Avenue, and Guinness Close.
- 7.97 In terms of commercial uses, the Yodel warehouse is also located to the north and has been the subject of two lapsed planning applications (refs. 27189/APP/2020/2181 and 27189/APP/2021/2782), granting permission for 150 residential units and 376 no. Shared-Living units. The Premier Inn hotel is also located to the north-east of the site and has consent under application reference 78950/APP/2024/2084 for alterations to the hotel, resulting in an increase in hotel rooms from 150 to 159 and reduction in restaurant space. The City Circle UK coach storage site, Selco Builders warehouse site and Hayes Asda Superstore is located to the east of the site. Further commercial uses are located to the south, including Nippon Express, Attewell Ltd and Geiger UK.
- 7.98 The Design Code incorporates a set of controls that are intended to safeguard the amenity of future occupiers and neighbouring occupiers. Minimum separation distances between building zones, ranging from 10–25 m (as set out in Parameter Plan 1), are proposed to secure adequate daylight, privacy and reduced overlooking. Balconies and other projections are restricted to a maximum 2 m and must respect specified projection zones, with all other amenity spaces required to be inset (DC 3.02-3.03). Streets and pedestrian routes include defensible landscape buffers, with front gardens required to be 2–3 m deep and boundaries limited to 900mm height, supported by hedge or tall planting to provide ground-level screening (DC 1.59-1.62). Where front-facing dwellings are next to active pedestrian corridors, privacy to internal rooms, particularly bedrooms, must be managed through duplex arrangements, increased buffer depth, or other mitigation (DC 1.37, 1.41, 1.45, 1.49, 1.53, 1.57).
- 7.99 Neighbour amenity is further safeguarded through controls on massing, daylight and overshadowing. Stepped building heights and a requirement for height

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variation within blocks ensure façades do not create overbearing conditions (DC 3.13–3.16). Daylight and sunlight analysis must inform the final placement of trees, planting and buildings (DC 1.12, 3.25). Tree-planting rules include minimum façade offsets of 4 m (and 8 m for landmark trees) with evergreen species encouraged to maintain year-round visual screening (DC 1.34, 1.38, 1.55–1.58, 1.70–1.73). Podium courts must use landscape buffers and boundaries to maintain privacy while ensuring overlooking for safety (DC 1.63–1.65). Refuse stores must be more than 3 m from residential windows, screened, and located away from private gardens (DC 2.19–2.20). Taken together, these DC provisions ensure the development protects privacy, daylight, outlook and overall residential amenity for both existing neighbours and future occupants.

- 7.100 Furthermore, a Daylight and Sunlight Assessment has been submitted and independently assessed by the Council's third-party consultants. The consultants noted that the assessment followed BRE guidance and agreed with the overall conclusions. The impact of the development on neighbour daylight and sunlight provisions is within the parameters of acceptability, especially given the urban context of the scheme. No fundamental objections to the scheme on daylight and sunlight grounds were raised and whilst some points of clarification were identified it has been agreed that any outstanding matters would be resolved at the Reserved Matters stage of the planning application process in the event of an approval.
- 7.101 Based on the Parameter Plans and Design Code submitted, it is concluded that the scheme should not result in any significant impact to the residential amenity of surrounding residential properties, by reason of loss of lighting, dominance or loss of privacy. Subject to the submission of acceptable details at the Reserved Matters stage, the scheme is considered to comply with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

### Environmental Issues

#### *Noise*

- 7.102 Policy D14 of the London Plan (2021) states that development should reduce, manage and mitigate noise to improve health and quality of life. This can be done by separating noise generating uses from noise sensitive uses. Mitigation can also be secured through screening, layout, orientation, uses and materials. This is supported by Policy EM8 of the Hillingdon Local Plan: Part 1 (2012).
- 7.103 The Design Code incorporates a range of measures that directly help manage and mitigate noise and disturbance across the development. Requirements for defensible front gardens measuring 2–3 m in depth, with boundaries no higher than 900mm and supported by evergreen or tall planting (DC 1.59-1.62), ensure a soft landscaped buffer between homes and active pedestrian or vehicular spaces, reducing sound transmission at ground level. The planting strategy further enhances acoustic buffering, including of substantial evergreen species (DC 1.34; DC 1.38; DC 1.55-1.58; DC 1.70-1.73). These landscape-based measures help break up hard surfaces, absorb sound, and limit direct noise

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exposure to sensitive rooms. Podium courtyards are similarly required to integrate hedge planting and low boundary treatments to manage noise spill from communal activity spaces into adjacent dwellings (DC 1.63-1.65).

7.104 Operational and vehicular noise is addressed through explicit controls on servicing, refuse management and movement routes. Refuse and recycling stores must be well lit, ventilated, visually screened, and located no closer than 3 m to any residential window, mitigating disturbance from collection activity (DC 2.19-2.20). The design of the site's movement network prioritises traffic calming through pedestrian priority streets, narrowed carriageways, and raised tables at key junctions, reducing vehicle speeds and associated noise impacts (DC 2.01-2.04). Service access along Fairey Way is required to operate as a low speed, one-way shared surface, incorporating planting buffers and controlled dimensions to minimise noise from servicing vehicles (DC 1.43-1.46). A mandatory, site-wide external lighting strategy further supports amenity by reducing opportunities for anti-social behaviour and late evening disturbance (DC 1.78–1.81).

7.105 Specifically, 368m<sup>2</sup> of flexible commercial / community floorspace (including E(a) retail, E(b) food and drink, E(e) medical or health services, E(f) nursery, E(g)(i) offices, F.2(a) shop with essential goods, F.2(b) hall or meeting place for local community) is proposed on the ground floor of Blocks A1 and A2, either side of of the proposed Gateway public open space. The nearest residential properties to the proposed commercial / community floorspace are the flats located in Blocks A1 and A2. Further afield are the residents in Block B flats and across North Hyde Road, are existing residents located along Keith Road. Accordingly, it is considered necessary to secure Conditions 11 and 12 to restrict the hours of operation and servicing as follows:

Operation:

- 06:00 to 23:00 hours, Mondays to Saturdays and
- 10:00 to 18:00 hours on Sundays.

Servicing:

- 0700 and 2300 hours, Monday to Saturday, and
- 09:00 and 18:00 hours on Sundays, Public or Bank Holidays.

7.106 The Council's Noise Specialist has been consulted and confirms that sufficient information has been submitted regarding noise related impacts. No objection has been raised subject to securing the necessary restrictions via planning condition.

7.107 As the responsibility for mitigating impacts from existing noise is on the noise-sensitive use, Conditions 14 and 15 are also proposed to achieve necessary noise levels to protect the amenity of neighbouring residents. Subject to such conditions, the development would accord with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) and Policy D14 of the London Plan (2021).

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### *Air Quality*

- 7.108 Policies SI 1 of the London Plan (2021), EM8 of the Hillingdon Local Plan: Part 1 (2012) and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020) are all directly relevant to the proposal. These policies can be read in full in the Committee Report Part 3 - Policy Appendix, and in summary, seek to safeguard and improve air quality to protect existing and new sensitive receptors. These aims are also supported by the NPPF (2024) at chapter 15.
- 7.109 The application site is located within the Hillingdon Air Quality Management Area and Hayes Air Quality Focus Area. Specifically, Focus Areas are declared where existing conditions exceed the EU annual mean limit value for nitrogen dioxide (NO<sub>2</sub>), have high human exposure and current planned measures are insufficient to resolve the poor air quality issues.
- 7.110 The Council's Air Quality Officer has confirmed that the proposed development is not air quality neutral or air quality positive, as required by its Focus Area status. It has been calculated that the air quality impact associated with traffic emissions could be mitigated through the payment of a sum up to £174,299 towards off site air quality improvement works. The final sum would be calculated at the Reserved Matters stage should the application be approved. Subject to the securement of this financial contribution towards the delivery of the Hillingdon Air Quality Local Action Plan (please refer to S106 Head of Term iii), alongside Conditions 18, 28 and 53, including the reduction of emissions during construction and occupation, the development would accord with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 1 of the London Plan (2021) and the NPPF (2024).

### *Trees and Landscaping*

- 7.111 Policies G1 and G5 of the London Plan (2021), DMEI 1, DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020) are all directly relevant to the proposed development. These policies can be read in full in the Committee Report Part 3 - Policy Appendix, and in summary, seek to safeguard existing trees and deliver high quality landscaping to enhance amenity, biodiversity and green infrastructure. These aims are also supported by the NPPF (2024) at chapter 12.
- 7.112 During the application process, the proposal was amended to reduce the impact on existing and well established trees. A total of 10 individual trees, 4 whole groups, and 16 noted trees within groups are proposed for removal to facilitate the development at Hyde Park Hayes. The individual trees earmarked for removal include Tree Numbers 1, 6, 7, 14, 23, 24, 25, 26, 41, and 42, spanning BS5837 Categories B and C. Entire Groups 1, 2, 3, and 4 are also to be removed, alongside select trees from Groups 7 (G7.4–G7.8, G7.12, G7.13) and 8 (G8.4–G8.5). These removals are determined necessary due to the building footprint, spatial conflicts with proposed structures, and landscape reconfiguration requirements, as outlined within the Arboricultural Implications Assessment.

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- 7.113 The Design Code sets out a comprehensive, landscape led tree strategy intended to create a coherent green network and to enhance biodiversity, visual amenity and urban cooling. The strategy prioritises the retention of existing mature trees, particularly along North Hyde Road and Millington Road, where established tree lines contribute positively to character (Parameter Plan 06 – Trees). Where removals are necessary, they are limited to lower quality specimens or where retention is not feasible within the layout (Design Code DC 1.67–DC 1.69; Parameter Plan 06). Up to 26 existing trees are identified within the parameters as potentially requiring removal to facilitate development (Parameter Plan 03 and 06).
- 7.114 New tree planting is organised across seven defined Tree Zones, including the Gateway, Social Heart, Nurture Garden, Connecting Routes, Millington Road, Above Basement Areas, and General Pedestrian Areas. The Code directs small-medium multi-stem trees for squares and gardens, medium-large street trees for frontages, mixed native species to connect habitats, and landmark trees to aid wayfinding and legibility (see Parameter Plan 06 (Trees) and Tree Types Diagram; DC 1.70-DC 1.73 on positioning, street standards and soil volumes).
- 7.115 Street tree provision is mandatory and integral to the public realm. Trees must be planted along primary frontages out of visibility splays, with clear stems and set-backs to enable healthy canopy development. At least one tree per two on street parking bays should be provided where feasible. Above basements and podiums, trees must be accommodated via raised planters or engineered tree pits with sufficient rootable volume and positive drainage connections (DC 1.70-DC 1.73).
- 7.116 The Code embeds biodiversity-led requirements: a mix of deciduous and evergreen species for year-round interest (DC 1.67), delivery of the Urban Greening Factor target of 0.4 and 10%+ Biodiversity Net Gain (DC 1.75), and a Nurture Garden requirement of 30%+ tree cover with 15%+ canopy at maturity (DC 1.28). The wider planting concept intentionally transitions from more structured at the Gateway to wilder, layered and habitat rich at the site's centre.
- 7.117 The Design Code does not prescribe a fixed number of new trees. Instead, it establishes zonal controls, mandatory street tree rules, minimum offsets, canopy and biodiversity targets, and podium/above basement planting requirements. The final quantity, species and exact locations will be set at Reserved Matters stage to respond to detailed design, engineering constraints, and biodiversity calculations. While the parameter plans note up to 26 removals, the Code requires new planting across streets, open spaces and podiums. Overall numbers will therefore be fixed through subsequent submissions rather than at outline stage.
- 7.118 The final details of hard and soft landscaping are proposed to be secured by Condition 36 to ensure that the landscape scheme to be delivered is high quality and retained in the long term. Subject to this condition, the proposal would

accord with Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 (2020).

#### *Urban Greening Factor*

- 7.119 Policy G5 of the London Plan (2021) states that major development proposals should contribute to the greening of London and that the target score for residential development is 0.4.
- 7.120 The illustrative scheme is proposed to achieve an Urban Greening Factor (UGF) of 0.48 which exceeds the minimum target of 0.4. The Design Code embeds biodiversity-led principles, requiring a species mix of deciduous and evergreen trees to ensure year-round greening and ecological value. The 0.4 target score is proposed to be secured by Condition 36.

#### *Biodiversity*

- 7.121 The Environment Act 2021 has established that all planning permissions granted in England have to deliver at least 10% BNG from January 2024. Paragraph 187 of the NPPF (2024) also states that planning decisions should contribute to and enhance the natural and local environment by: d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures. This is supported by Policy G6 of the London Plan (2021) and Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020).
- 7.122 The Preliminary Ecology Appraisal submitted confirms that the site is located in an area of low ecological potential. The site does not support any notable habitats, comprising Priority Habitats under the UK Biodiversity Action Plan or ancient woodland.
- 7.123 The illustrative scheme comprises soft landscaping and includes the provision of areas of biodiverse green roof within inaccessible areas of the roof of buildings, other green roof habitat across accessible areas of roof and a variety of habitats across the public realm and ground floor including private vegetated gardens, other neutral grassland, modified grassland, native hedgerow and trees. Accordingly, the development can deliver a net gain for biodiversity, with indicative proposals delivering a 56% net gain in habitat units and 40% in hedgerow units. This exceeds the minimum 10% statutory requirement.
- 7.124 The final details of a Biodiversity Net Gain Scheme which maximises net gains in biodiversity value for the development would be secured by Condition 39. Subject to such a condition, the proposal is considered to accord with the NPPF (2024), Policy G6 of the London Plan (2021) and Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020).

#### *Flood Risk*

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- 7.125 Policy SI 12 of the London Plan (2021) requires that development proposals ensure that flood risk is minimised and mitigated. This is supported by Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMEI 9 of the Hillingdon Local Plan: Part 2 (2020). Notably, proposals that fail to make appropriate provision for flood risk and surface water flooding mitigation will be refused.
- 7.126 The application site is located in Flood Zone 1, meaning that the site is at a very low risk of fluvial flooding and capable of incorporating sustainable drainage requirements. Should the application be approved, the Reserved Matters application would secure final details to ensure compliance with Policy SI 12 of the London Plan (2021), Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMEI 9 of the Hillingdon Local Plan: Part 2 (2020).

#### *Drainage*

- 7.127 Policy SI 13 of the London Plan (2021) also requires that development proposals utilise sustainable urban drainage systems (SuDS) unless there are practical reasons for not doing so and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. This is supported by Policy EM6 of the Hillingdon Local Plan: Part 1 (2012) and Policy DMEI 10 of the Hillingdon Local Plan: Part 2 (2020).
- 7.128 The Council's Flood and Water Management consultants have confirmed that the information submitted is sufficient for this stage of the planning process. Officers note that the proposed drainage strategy incorporates green infrastructure and SuDS features. It is considered reasonable to assume that a sufficient and acceptable drainage strategy could be secured at the detailed design stage of the planning process. It is also noted that Thames Water have raised no objection in respect of drainage considerations.
- 7.129 Accordingly, a revised final drainage strategy is proposed to be secured by Conditions 43 and 44. Subject to such conditions, the proposed development is not considered contrary to Policy DMEI 10 of the Hillingdon Local Plan: Part 2 (2020), Policy EM6 of the Hillingdon Local Plan: Part 1 (2012), Policy SI 13 of the London Plan (2021).

#### *Water Infrastructure*

- 7.130 Policy SI 5 of the London Plan (2021) sets out water infrastructure requirements for commercial forms of development, including achieving at least the BREEAM excellent standard for the 'Wat 01' water category or equivalent measures to reduce water use, provide adequate wastewater infrastructure capacity and minimise the potential for misconnections between foul and surface water networks.
- 7.131 During the consultation process, Thames Water has confirmed no objection to the proposed development in respect of wastewater network and sewage treatment works. Compliance with BREEAM standards for Wat 01 credits is

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proposed to be secured under Condition 19. A Piling Method Statement is also proposed to be secured by Condition 31. Subject to these conditions, the proposed development would accord with Policy SI 5 of the London Plan (2021).

#### *Land Contamination*

- 7.132 Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (2020) states that development on potentially contaminated sites shall assess conditions and demonstrate that the site can be safely remediated. Planning conditions and S106 legal agreements can be used to secure the appropriate level of detail required.
- 7.133 A phase 1 contaminated land study has been submitted for consideration and is considered sufficient and acceptable for the initial stage of the planning process. Condition 29 is proposed to secure further details of a remediation strategy. Subject to such a condition, the proposal is not considered contrary to Policy DMEI 12 of the Hillingdon Local Plan: Part 2 (2020).

#### Transport

- 7.134 Policies T4, T6, T6.2 of the London Plan (2021), DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) are all directly relevant to the proposed development. These policies can be read in full in the Committee Report Part 3 - Policy Appendix, and in summary, seek to deliver development which is sustainable in transport terms and safeguards highway and pedestrian safety. These aims are also supported by the NPPF (2024) at chapter 9, including paragraph 116 of the NPPF (2024) which states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.
- 7.135 The site is located within the Pinkwell ward, within close proximity to Hayes Town centre and benefits from a strong connection to the new Elizabeth line, located just 500m away equivalent to an 8 minute walk. According to the TfL webCAT planning tool, the site has a moderate Public Transport Accessibility Level (PTAL) rating of 4.
- 7.136 Vehicular access to the site is currently taken from Millington Road via the Dawley Road roundabout to the west, North Hyde Road to the north and Station Road to the east. These points of access would continue to serve the proposed development, which could comprise up to 673 units. As shown in the illustrative scheme, the development would comprise 650 units.

#### *Car Parking*

- 7.137 Policy T6.1 of the London Plan (2021) states that Outer London sites with a PTAL rating of 4 should not exceed a maximum of 0.5 - 0.75 car parking spaces per 1, 2 and 3 bed dwellings.

7.138 The illustrative scheme car parking proposal is for 282 parking spaces, comprising 135 spaces for new residential units (equivalent to 0.2 spaces per dwelling), 112 spaces for retained commercial uses (62 for a tenant, 50 for Premier Inn), 24 spaces for HPH1, and 5 operational & 6 future development spaces. This accord with Policy T6.1 of the London Plan (2021) and is supported by the Highway Authority, subject to cycle parking layouts being secured at Reserved Matters stage.

#### *Disabled Person Car Parking*

7.139 For commercial uses, Policy T6.5, Table 10.6, of the London Plan (2021) states that 6% of all car parking spaces should be provided as designated disabled persons parking bays and 4% should be provided as enlarged parking bays which are capable of being converted to disabled persons parking. For residential, Policy T6.1 of the London Plan (2021) requires 3% of dwellings to be provided for disabled persons from the outset, with capacity to provide an additional 7%. This would be secured at the Reserved Matters Stage and by Conditions 36 and 50.

#### *Electric Vehicle Charging Points (EVCPs)*

7.140 Policy T6 of the London Plan (2021) states that new developments with car parking should make provision for electric vehicles or other Ultra-Low Emission vehicles. Policy T6.1 requires the provision of 20% of spaces with active electric vehicle chargers (EVCPs), with the remainder of spaces made passive. This is proposed to be secured via Conditions 36 and 50.

#### *Cycle Parking*

7.141 Policy T5, Table 10.2, of the London Plan (2021) sets out the cycle parking standards for commercial and residential uses.

7.142 The illustrative scheme would provide 1,210 cycle parking spaces, including:

- 1,192 long-stay (residential)
- 18 short-stay (visitors)

7.143 A detailed mix of stand types is supplied:

- 908 two-tier racks
- 242 Sheffield stands
- 60 wide Sheffield stands for non-standard/adapted cycles

7.144 Proof of concept has been demonstrated by the illustrative scheme. The Highway Authority have confirmed no objection, subject to detailed cycle parking layouts being secured at Reserved Matters stage and by Condition 36.

#### *Parking Design and Management Plan*

7.145 As noted above, passive electric vehicle charging infrastructure is proposed. The applicant has therefore committed to increasing the number of electric vehicles

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charging spaces over time. The detail of a parking design and management plan is proposed to be secured under Condition 50. This shall also ensure that all car parking spaces are leased and not sold (also secured by Condition 20), and that accessible parking spaces are provided in response to demand. A restriction on parking permits would also be secured under S106 Head of Term ix.

#### *Trip Generation*

- 7.146 The Healthy Streets Transport Assessment (June 2025) demonstrates that the redevelopment would generate fewer vehicle trips than the existing office and MSCP uses. The existing site could generate approximately 210 AM peak car arrivals and around 441 arrivals / 476 departures across a 12-hour period (rising to 447/482 with taxis). Under the proposed development these figures reduce to approx. 267 arrivals and 300 departures, showing a net reduction in vehicular movements and no anticipated detrimental impact on highway capacity, safety or parking stress. Accordingly, no significant impact is anticipated on congestion, road safety or parking stress.

#### *Access*

- 7.147 Vehicular access remains from Millington Road, with connections to Dawley Road, North Hyde Road and Station Road. Resident access, servicing and delivery is feasible and will need to be confirmed as part of a Reserved Matters application should the application be approved.
- 7.148 The proposed crossing across North Hyde Road is proposed to be tested as part of a Road Safety Audit under Condition 34, with delivery secured under S106 Head of Term vi. This is considered a positive benefit of the scheme.

#### *Active Travel Zone Assessment*

- 7.149 An Active Travel Zone Assessment has been carried out and identified highway improvement works to encourage more sustainable forms of travel, including bus stop enhancement works as requested by TfL. Financial contributions are proposed to be secured under the S106 HoT vii and viii.

#### *Travel Plan*

- 7.150 A detailed and finalised Travel Plan is proposed to be secured through Condition 49. This shall require a 56% sustainable mode-share target for outer London and include robust measures to achieve modal shift.

#### *Construction Logistics Plan*

- 7.151 Having regard to comments received from TfL and the Highway Authority, a Construction Logistics Plan is proposed to be secured under Conditions 28.

#### *Delivery and Servicing Plan*

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- 7.152 The Highways Authority have specifically noted that deliveries must occur on-plot, not from North Hyde Road. If recommended for approval, a Reserved Matters application is required to demonstrate safe and efficient refuse vehicle routing without re-entering the site. Condition 48 is also proposed to secure a Delivery, Servicing and Waste Management Plan.

#### *Transport Conclusion*

- 7.153 Subject to final details being submitted at the Reserved Matters Stage, and subject to securing the necessary planning conditions and obligations, the proposed development would not be considered to prejudice conditions on the local highways network, in accordance with Policies DMT 1, DMT 2, DMT 5 and DMT 6 of the Hillingdon Local Plan: Part 2 (2020) and Policies T4 and T7 of the London Plan (2021).

#### Sustainable Development

##### *Whole-Life Carbon Cycle*

- 7.154 Policy SI 2, Part F, of the London Plan (2021) states that development proposals referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.
- 7.155 The applicant has submitted a Whole Life-Cycle Carbon (WLC) assessment as required. Condition 27 would secure the submission of a final detailed assessment on WLC emissions. Subject to such a condition, the proposal would accord with Policy SI 2, Part F, of the London Plan (2021).

##### *CO2 Emissions*

- 7.156 Policy SI 2 of the London Plan (2021) and DMEI 2 of the Hillingdon Local Plan: Part 2 (2020) are relevant to the development proposed. These policies can be read in full in the Committee Report Part 3 - Policy Appendix, and in summary, seek to secure major development proposals as net zero-carbon by reducing greenhouse gas emissions in operation and minimising energy demand in accordance with the energy hierarchy. These aims are also supported by the NPPF (2024) at chapter 14.
- 7.157 Based on the Energy Statement submitted, the development would utilise air source heat pumps and photovoltaic panels as part of the energy strategy. Accordingly, the development is estimated to achieve a 79% and 25% reduction in CO2 emissions compared to 2021 Building Regulations for the domestic and non-domestic elements respectively. The development therefore falls short of the 35% reduction on site for the non-domestic element of development but complies for the domestic element of development. Despite the non-compliance, it is feasible that the development could comply with the on site requirements and mitigate the remaining emissions in order to achieve net zero-carbon as per Policy SI2 of the London Plan (2021).

- 7.158 S106 HoT iv is proposed to secure a carbon offset contribution at the Reserved Matters stage of the planning process, totalling up to £367,217. Conditions 25 and 41 are proposed to secure an amended final Energy Statement, including an Energy Monitoring, Recording and Reporting Plan, as per planning policy requirements. Subject to such conditions and planning obligations, the development would accord with Policy SI 2 of the London Plan (2021).

#### *Energy Infrastructure*

- 7.159 Policy SI 3 of the London Plan (2021) states that major development proposals should make provisions to connect into district heating networks, thereby utilising secondary heat sources.
- 7.160 Condition 17 is proposed to secure a future connection to a district heating scheme for export of low-grade heat, should one become available, ensuring compliance with Policy SI 3 of the London Plan (2021).

#### *Overheating*

- 7.161 Policy SI 4 of the London Plan (2021) states that development should minimise adverse impacts on the urban heat island and reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy.
- 7.162 A short summary of the overheating proposals has been provided including early commitments to low g-value, recessed windows and external shading. This is acceptable for the Outline Planning stage. Condition 42 is proposed to secure the final details of a full TM59 overheating assessment as a Reserved Matter. Subject to such a condition, the proposal will comply with Policy SI 4 of the London Plan (2021).

#### *Waste and Circular Economy*

- 7.163 Policy SI 7 and Policy D6 of the London Plan (2021) require developments to be designed with adequate, flexible, and easily accessible storage space and collection systems that support, as a minimum, the separate collection of dry recyclables (at least card, paper, mixed plastics, metals, glass) and food. Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) supports this policy from a design perspective.
- 7.164 Specifically, Policy SI 7, Part B, of the London Plan (2021) states that referable applications should submit Circular Economy Statements to promote circular economy outcomes and aim to be net zero-waste. Policy EM11 of the Hillingdon Local Plan: Part 1 (2012) also supports these objectives.
- 7.165 An Operational Waste Management Strategy has been submitted for consideration. Based on the indicative scheme, bin storage areas are proposed in accessible locations within sufficient distance of the proposed collection

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points. This principle is secured in the Design Code, including Design Code rule numbers DC 2.19 and DC 2.20.

- 7.166 The applicant has submitted a Circular Economy Statement as required. Condition 26 would secure the submission of a final detailed Statement. Subject to such a condition, the proposal would accord with Policy SI 7 of the London Plan (2021).

#### *Digital Connectivity*

- 7.167 Policy SI 6 of the London Plan (2021) requires that development provides ducting space for full fibre connectivity.
- 7.168 Condition 16 is proposed and would ensure that sufficient ducting space for full fibre connectivity infrastructure is provided within the development. Subject to the recommended condition, the proposed development would accord with Policy SI 6 of the London Plan (2021).

## **8 Other Matters**

### Airport Safeguarding

- 8.1 Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020) states that the Council will support the continued safe operation of Heathrow Airport and RAF Northolt and will consult with the airport operator on proposals in the safeguarded areas. Proposals that may be a hazard to aircraft safety will not be permitted.
- 8.2 The site is located within the safeguarded area for Heathrow Airport and outside of the safeguarded area for RAF Northolt. The National Air Traffic Services, Heathrow Airport Ltd and the Ministry of Defence have been consulted and have confirmed no safeguarding objections, subject to securing Conditions 33 (Radar Mitigation Scheme), 36 (Landscape Scheme), 40 (Bird Hazard Management Plan), and 45 (Glint and Glare Assessment). Subject to such conditions, the proposal would comply with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

### Infrastructure

#### *Infrastructure Assessment*

- 8.3 Policy D2 of the London Plan (2021) states that an unallocated site that may cause planned infrastructure capacity to be exceeded might need to provide additional infrastructure proportionate to the development.
- 8.4 The proposal will generate Hillingdon and Mayoral CIL contributions to fund the provision of infrastructure. A comprehensive set of planning obligations are also to be secured by a Section 106 legal agreement if recommended for approval.

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Accordingly, the proposal is not considered to be contrary to Policy D2 of the London Plan (2021).

### *Health*

- 8.5 National, regional and local policies require planning decisions to promote healthy, inclusive communities by supporting healthy lifestyles, aligning with local health and wellbeing strategies, and providing sufficient health and social infrastructure. The London Plan emphasises addressing health inequalities and ensuring developments positively impact physical and mental health, while Hillingdon's Local Plan highlights the Borough's pressing need for additional healthcare facilities to meet population growth and changing demographics. This includes the NPPF (2024), Policy GG3 of the London Plan (2021), Policy CI1 of the Hillingdon Local Plan: Part 1 (2012) and supporting paragraphs of the Hillingdon Local Plan: Part 2 (2020).
- 8.6 In particular, paragraph 7.2 of the Hillingdon Local Plan: Part 2 (2020) states that there is a particularly pressing need in the Borough for additional health care facilities to address higher than expected birth rates and an increase in the older population.
- 8.7 As part of the planning application process, the NHS Property Services have submitted representations explaining that a financial contribution is required to address the increase in population due to the development and the additional floorspace required based on the lack of existing primary care capacity.
- 8.8 Accordingly, Officers have used the HUDU Planning Contributions Model to assess the health service requirements and cost impacts of a scheme which could deliver up to 673 residential units, on the basis of three different tenure mix scenarios. S106 of Term ii proposes to secure a financial contribution which is to be calculated at the Reserved Matters stage, totalling up to £942,489 (based on a 100% private Scenario) in order to fund enhanced or new health facilities within the London Borough of Hillingdon. The contribution would reduce if affordable housing was delivered. Subject to a S106 legal agreement, the proposal complies with the NPPF (2024), Policy GG3 of the London Plan (2021), Policy CI1 of the Hillingdon Local Plan: Part 1 (2012) and the Hillingdon Local Plan: Part 2 (2020).

### Environmental Impact Assessment

- 8.9 The proposed development does not constitute EIA development as per The Town and Country Planning (Environmental Impact Assessment) Regulations 2017.

### Human Rights

- 8.10 The development has been assessed against the provisions of the Human Rights Act, and in particular Article 1 of the First Protocol and Article 8 of the Act itself. This Act gives further effect to the rights included in the European

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Convention on Human Rights. In arriving at this recommendation, due regard has been given to the applicant's reasonable development rights and expectations which have been balanced and weighed against the wider community interests, as expressed through third party interests / the Development Plan and Central Government Guidance.

### Equality

- 8.11 Due consideration has been given to Section 149 of the Equality Act with regard to the Public Sector Equality Duty in the assessment of this planning application. No adverse equality impacts are considered to arise from the proposal.

### Local Finance Considerations and CIL

#### *Planning Obligations*

- 8.12 Policy DMCI 7 of the Hillingdon Local Plan: Part 2 (2020) states that whilst infrastructure requirements will be predominantly addressed through the Council's Community Infrastructure Levy (CIL), planning obligations will be sought on a scheme-by-scheme basis. Applications that fail to secure an appropriate Planning Obligation to make the proposal acceptable will be refused.
- 8.13 The Community Infrastructure Levy Regulation 2010 (Regulations issued Pursuant to the 2008 Act) and the NPPF have put three tests on the use of planning obligations into law. It is unlawful (since 6th April 2010) to request planning obligations that do not meet the following tests:
- i. necessary to make the development acceptable in planning terms;
  - ii. directly related to the development; and
  - iii. fairly and reasonable related in scale and kind to the development.
- 8.14 The effect of the Regulations is that the Council must apply the tests much more strictly and is only to ask for planning obligations that are genuinely necessary and directly related to a development. Should planning obligations be requested that do not meet the policy tests the Council would have acted unlawfully and could be subject to a High Court challenge.
- 8.15 London Plan (2021) Policy DF1 (Delivery of the Plan and Planning Obligations) also states:
- D) When setting policies seeking planning obligations in local Development Plan Documents and in situations where it has been demonstrated that planning obligations cannot viably be supported by a specific development, applicants and decision-makers should firstly apply priority to affordable housing and necessary public transport improvements, and following this:
- 1) recognise the role large sites can play in delivering necessary health and education infrastructure; and
  - 2) recognise the importance of affordable workspace, and culture and leisure facilities in delivering good growth.

8.16 On the basis of the Development Plan and the Community Infrastructure Levy Regulation 2010, it is only considered reasonable to request contributions for the matters outlined in the Heads of Terms contained in the *Summary of Recommendation* section at the beginning of this report. These are listed in summary below:

- i. Affordable Housing
- ii. Health Contribution
- iii. Air Quality Mitigation Contribution
- iv. Carbon Offset Contribution
- v. Public Open Space Contribution
- vi. Section 278 Agreement
- vii. Hillingdon Council Active Travel Zone / Healthy Streets Contribution
- viii. Transport for London Contributions
- ix. Residential Parking Permit Restrictions
- x. Employment and Construction Training Scheme
- xi. Project Management and Monitoring Fee

#### *Community Infrastructure Levy*

8.17 Please be advised that as from 1 April 2012, all planning approvals for schemes with a net additional internal floor area of 100m<sup>2</sup> or more will be liable for the Mayoral Community Infrastructure Levy (Mayoral CIL), as legislated by the Community Infrastructure Levy Regulations 2010 and The Community Infrastructure Levy (Amendment) Regulations 2011. The liability payable will be equal to £60 per square metre (from April 2019). The London Borough of Hillingdon is a collecting authority for the Mayor of London and this liability shall be paid to LBH in the first instance.

8.18 In addition, the development represents Chargeable Development under the Hillingdon Community Infrastructure Levy, which came into effect on 1st August 2014.

8.19 The liability payable is as follows (subject to indexation):  
Hillingdon CIL: £4,909,485  
Mayoral CIL: £2,230,690

8.20 However, please note that this has been calculated based on the information available to the officer. The final amount will be reviewed post determination by the Council's Planning Obligations Team and set out to the liable party in line with the CIL Regulations.

## **9 Conclusion / Planning Balance**

9.1 This application seeks Outline Planning Permission (with all matters reserved excluding access) for demolition of existing buildings (above basement level) and phased delivery of a residential development (Class C3), flexible commercial

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/ community floorspace (368m<sup>2</sup>), new public realm, landscaping, play space, car parking, cycle parking and associated works.

- 9.2 The proposed loss of the existing underutilised office use is accepted in principle. There are no objections to the loss of the existing office buildings themselves as they are not considered to have significant architectural merit. Significantly, the provision of much needed residential units on sustainably located brownfield land within close proximity to Hayes Town Centre and only 500m (8 minute walk) of the Hayes and Harlington Station is supported. The proposed flexible commercial / community space will generate jobs on a site which is generally accepted as underutilised in its current form. It is noted that the new residents of the development will provide further business for local traders and support the vitality and viability of Hayes Town Centre. This weighs significantly in favour of the development in the planning balance.
- 9.3 The proposal for 15% family housing (3-bedroom units) is a positive provision for a large strategic residential scheme and would contribute to meeting need within the borough. In terms of affordable housing, the scheme has been subject to viability testing by the Council's third-party consultants and the Greater London Authority (GLA). Following such assessment, it has been concluded that a 100% private market scheme generates a deficit but is within the range of deliverability. Despite this, the developer has agreed to enter into a S106 legal agreement which would obligate them to carry out all reasonable endeavours to secure grant funding and maximise affordable housing provision on site. Should it be sufficiently evidenced, in agreement with the Council, that all reasonable endeavours have been exhausted and that no grant funding has been secured to realise affordable housing provision, the scheme would revert to 100% private market housing. Given the significant viability constraints on the proposed scheme, it is concluded that the proposed conditional cascade mechanism would realise the maximum amount of affordable housing possible, especially given the announcement of the GLA's emergency measures for housebuilding which have been introduced to accelerate housebuilding, unlock stalled sites and provide housebuilders with more certainty by improving both the viability and deliverability of residential schemes. The conditional affordable housing cascade mechanism is proposed to be secured under S106 HoT (i) and includes viability review mechanisms to capture changes in viability over the lifetime of the multi-phase residential development. This is the reasonable and robust evidence based position which is considered, on the balance of probabilities, to realise sufficient public benefit by maximising the likelihood of affordable housing delivery.
- 9.4 Parameter Plans and a Design Code support the Outline Planning application submission, establishing parameters and design rules that future Reserved Matters must follow. Despite positive amendments being made as part of the application process, concerns were raised regarding the deliverability, quality and functionality of certain open spaces. Notwithstanding, the Parameter Plans and Design Code are considered to strike a reasonable balance against best-practice Design Code guidance documents, which emphasise that effective design codes should be simple, specific and proportionate. To address residual

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uncertainties and ensure high-quality delivery, the applicant has agreed that a revised Design Code will be secured by Condition 22, alongside further conditions requiring detailed materiality and landscape information at Reserved Matters stage.

- 9.5 Significant weight is afforded to the Government's Written Ministerial Statement on Planning Reform: Next Phase (18 November 2025). In this context, the application site's proximity to a major rail station represents a material consideration of significant weight, and any assessment of the proposal must give due regard to the Government's clear expectation that sustainably located development adjacent to stations should be supported unless demonstrable harm would clearly outweigh the substantial public benefits identified.
- 9.6 Other matters which are considered to be planning policy conflicts include the delivery of a shortfall in amenity space provision, play space provision, and open space provision. However, these are considered to be minor conflicts with standards exhibited by the illustrative scheme, not a detailed scheme, which would be submitted as part of the Reserved Matters stage of the planning application process. Conditions are proposed to maximise quantity and quality of these spaces, including a revised Design Code.
- 9.7 Planning obligations are proposed to secure affordable housing provisions, health contribution, an air quality contribution, carbon offset contribution, public open space contribution, highways works, active travel zone and healthy streets contribution, TfL contribution, parking permit restrictions, and employment strategy and construction training. A project management and monitoring fee would also be secured to manage and monitor the planning obligations.
- 9.8 Section 38(6) of the Planning and Compulsory Purchase Act 2004 states that planning applications should be determined in accordance with the development plan unless material considerations indicate otherwise. For the reasons outlined above and within the main body of the report, the application is considered to broadly comply with the Development Plan. Where there are minor conflicts with the Development Plan, there are considered to be sufficient mitigating factors and benefits which outweigh such conflicts. Subject to the planning conditions and obligations recommended, the proposed development can mitigate the planning policy conflicts identified. Accordingly, the development is considered, on balance, to be acceptable with respect to design, heritage, residential amenity, environmental issues, transport, and sustainability.
- 9.9 The application is recommended for approval, subject to Stage 2 referral to the Mayor of London, securing the planning conditions set out in Appendix 1 and a Section 106 legal agreement.

## **10 Background Papers**

- 10.1 Relevant published policies and documents considered in respect of this application are set out in the report. Documents associated with the application

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(except exempt or confidential information) are available on the [Council's website here](#), by entering the planning application number at the top of this report and using the search facility. Planning applications are also available to inspect electronically at the Civic Centre, High Street, Uxbridge, UB8 1UW upon appointment, by contacting Planning Services at [planning@hillington.gov.uk](mailto:planning@hillington.gov.uk).

# **APPENDICES**

## **Planning Application**

**79625/APP/2025/2128**

## Appendix 1: Recommended Conditions and Informatives

### Conditions

#### 1. OUT1 Compliance - Outline Planning Permission Time Limit

##### Compliance - Outline Planning Permission Time Limit

The development in each phase subject to the Outline Planning Permission (Phases 1, 2, and 3) hereby permitted shall begin either before the expiration of three years from the date of this permission, or before the expiration of two years from the date of approval of the reserved matters to be approved for the relevant phase, whichever is the later.

##### REASON

To comply with Section 92 of the Town and Country Planning Act 1990 (As Amended).

#### 2. OUT2 Compliance - Reserved Matters

##### Compliance - Reserved Matters

Phase 1: The submission of applications for the reserved matters (being scale, layout, appearance, and landscaping) for Phase 1 shall be submitted to the Local Planning Authority before the expiration of three years from the date of this permission and approved in writing before any development on that phase begins.

Phase 2: The submission of applications for the reserved matters (being scale, layout, appearance, and landscaping) for Phase 2 shall be submitted to the Local Planning Authority before the expiration of five years from the date of this permission and approved in writing before any development on that phase begins.

Phase 3: The submission of applications for the reserved matters (being scale, layout, appearance, and landscaping) for Phase 3 shall be submitted to the Local Planning Authority before the expiration of seven years from the date of this permission and approved in writing before any development on that phase begins.

##### REASON

To comply with Sections 91 and 92 of the Town and Country Planning Act 1990 (As Amended).

#### 3. NONSC Compliance - Phasing

##### Compliance - Phasing

The development hereby permitted shall not be carried out except in complete accordance with the phasing shown on page 34 of approved document reference "A12440-TPB-XX-XXX-RP-A-040003-S2-P02 Design and Access Statement Addendum (Dated December

2025)". Each Phase is defined broadly as follows:-

Phase 1 (Block A and Gateway open space):

- Block A1 and A2 constructed on the surface level car park.
- Gateway open space landscape installed.

Phase 2 (Block B and Social Heart open space):

- Demolition of HPH2.
- Block B (B1,B2,B3) and associated car parking.
- Narrowing of road between Block B and HPH3 with associated landscape.
- Completion of the Gateway and Social Heart open spaces.

Phase 3 (Block C and D and Nurture Garden open space):

- Demolition of HPH5 and MSCP.
- Basement refurbishment and extension.
- Construction of Block C and D.
- Completion of the Nurture Garden open space together with remaining street landscape.

#### REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

#### **4. RES4 Compliance - Accordance with Parameter Plans**

Compliance - Accordance with Parameter Plans

All reserved matters applications and subsequent development phases shall accord with the Location Plan and Parameter Plans hereby approved, including:-

A12440-TPB-ZZ-XXX-DR-A-041001-S2-P02 Site Location Plan

A12440-TPB-ZZ-ZZZ-DR-A-041001-S2-P06 Parameter Plan 1 - Building Zones;

A12440-TPB-ZZ-ZZZ-DR-A-041002-S2-P06 Parameter Plan 2 - Access and Movement;

A12440-TPB-ZZ-ZZZ-DR-A-041003-S2-P05 Parameter Plan 3 - Hard and Soft Landscape;

A12440-TPB-ZZ-ZZZ-DR-A-041004-S2-P04 Parameter Plan 4 - Building Heights;

A12440-TPB-ZZ-ZZZ-DR-A-041005-S2-P04 Parameter Plan 5 - Land Use;

A12440-TPB-ZZ-ZZZ-DR-A-041006-S2-P04 Parameter Plan 6 - Trees;

A12440-TPB-ZZ-ZZZ-DR-A-041007-S2-P02 Parameter Plan 7 - Max Building Heights; and

A12440-TPB-ZZ-ZZZ-DR-A-041008-S2-P01 Parameter Plan 8 - Basement Zones Plan.

#### REASON

To ensure the development complies with the provisions of the Hillingdon Local Plan Part 1 (2012), Part 2 (2020) and the London Plan (2021).

#### **5. RES5 Compliance - Supporting Documentation**

Compliance - Supporting Documentation

All reserved matters applications and subsequent development phases shall accord with the specified supporting plans and/or documents:

Planning:

Planning Statement (Dated 25th July 2025);  
Cover letter (Dated 10th December 2025);  
Health Impact Assessment (Dated July 2025);  
Economic Statement (Dated July 2025);  
7034-CBC-OH-RP-U-000001 Foul sewage and utilities assessment (Dated 23rd June 2025);

Design and Heritage:

Heritage, Townscape and Visual Impact Assessment (Dated July 2025)  
A12440-TPB-XX-XXX-RP-A-040001-S2-P06 Design and Access Statement (Dated July 2025)  
A12440-TPB-XX-XXX-RP-A-040003-S2-P02 Design and Access Statement Addendum (Dated December 2025)  
Archaeological Desk Based Assessment (Dated June 2025)  
HER-01231 Archaeological Response Letter (Dated 13th October 2025) (Response to Greater London Archaeological Advisory Service (GLAAS))  
OF-002334-FSS-01-B Gateway One Fire statement (Dated 4th July 2025)  
Fire Statement (Submitted August 2025)

Environmental:

CBA11915 v2 Arboricultural Implications Assessment (Dated November 2025)  
Wind Microclimate Assessment Report (Dated October 2025)  
Wind Microclimate Assessment Report Peer Review Response (Dated October 2025)  
JW/21740 Wind Microclimate Technical Note (Impact of Post-submission Amendments) (Dated November 2025)  
Daylight, Sunlight & Overshadowing Report (Dated 18th February 2026)  
Daylight, Sunlight & Overshadowing Appendices (Dated 18th February 2026)  
Daylight, Sunlight & Overshadowing Addendum Report (Dated 10th December 2025)  
KLG183/R2/Issue 2 Aviation Safeguarding Assessment for Planning (Dated June 2025)  
Preliminary Ecological Appraisal (Dated June 2025)  
Noise and Vibration Impact Assessment (Dated 16th May 2025)  
Phase I Geoenvironmental Report Rev. 02 (Dated June 2025)  
Biodiversity metric calculation tool

Sustainability:

12421-WCL-ZZ-ZZ-RP-Y-0005 Rev. 03 Circular Economy Statement (Dated 17th October 2025)

65214976-SWE-XX-XX-T-GE-0001 Rev. P03 Pre-Demolition & Pre-Redevelopment Waste Audit (Dated 16th October 2025)  
Flood Risk Assessment and Drainage Strategy (Dated October 2025)  
P452072-WW-XX-XX-RP-C-0001 Water Cycle Strategy (Dated July 2025)  
12421-WCL-ZZ-ZZ-RP-SS-0001 Rev. P03 Energy Statement (Dated 19th June 2025)  
12421-WCL-ZZ-ZZ-RP-Y-0002 Rev 3 Sustainability Statement (Dated 18th July 2025)  
12421-WCL-ZZ-ZZ-RP-Y-0005 Rev. 02 Circular Economy Statement (Dated 19th June 2025)  
J10-15789B-10-F1 Climate Change Resilience and Greenhouse Gas Assessment (Dated 6th June 2025)

Transport:

Healthy Streets Transport Assessment (Dated June 2025)  
Transport Technical Note (Dated 2nd December 2025)  
Outline Construction Logistics Plan (Dated June 2025)  
Site Waste Management Plan - Construction (Dated June 2025)  
Framework Delivery & Servicing Management Plan (Dated December 2025)  
Operational Waste Management Plan (Dated December 2025)  
Draft Parking Management Plan (Dated December 2025)  
Outline Travel Plan (Dated June 2025)

REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

## **6. NONSC Compliance - Housing Mix**

Compliance - Housing Mix

The development hereby approved shall comprise of no more than 673 residential units and shall strictly accord with the following housing mix parameters:

- 1 bedroom units: 20% to 45%
- 2 bedroom units: 30% to 45%
- 3+ bedroom units: At least 15%

REASON

To ensure that the development delivers a mix of housing units of different sizes to reflect the Council's latest information on housing need, in compliance with Policy DMH 2 of the Hillingdon Local Plan: Part 2 (2020) and Policy H10 of the London Plan (2021).

## **7. NONSC Compliance - Restrict Use Class**

Compliance - Restrict Use Class

Notwithstanding the Town and Country Planning (Use Classes) Order 1987 (as amended), or in any provision equivalent to that Class in any statutory instrument revoking and re-enacting that Order with or without modification, the development shall not be used for any purpose other than as:-

- Use Class C3: Up to 673 units for residential use; and
- Use Classes E and F.2: Up to 368m2 floorspace for flexible commercial and/or community use (E(a) retail, E(b) food and drink, E(e) medical or health services, E(f) nursery, E(g)(i) offices, F.2(a) shop with essential goods, F.2(b) hall or meeting place for local community).

#### REASON

To ensure that the provisions of the development are secured to the use proposed to prevent detrimental impacts arising from an alternative use which is not permitted, including impacts on the local highway network and air quality, in accordance with Policies DMTC 1, DMT 1, DMT 2 and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policies T4 and SI 1 of the London Plan (2021) and the National Planning Policy Framework (2024).

### **8. NONSC Compliance - Restrict Enlargement of Class E Buildings**

Compliance - Restrict Enlargement of Class E Buildings

Notwithstanding the provisions of Part 7, Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that Order with or without modification), the buildings shall not be extended.

#### REASON

To ensure that the Local Planning Authority have assessed all the implications of the development, including impacts on design, the local highway network and air quality, in accordance with Policies DMHB 11, DMT 1, DMT 2 and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policies D4, T4 and SI 1 of the London Plan (2021) and the National Planning Policy Framework (2024).

### **9. NONSC Compliance - Restrict Addition to Class E Building**

Compliance - Restrict Addition to Class E Building

Notwithstanding the provisions of Part 7, Schedule 2 of the Town and Country Planning (General Permitted Development) Order 2015 (or any order revoking and re-enacting that Order with or without modification), no additional structural internal mezzanine floorspace that can be used for storage shall be created in excess of that area expressly authorised by this permission.

#### REASON

To ensure that the Local Planning Authority have assessed all the implications of the development, including impacts on design, the local highway network and air quality, in accordance with Policies DMHB 11, DMT 1, DMT 2 and DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policies D4, T4 and SI 1 of the London Plan (2021) and the National

Planning Policy Framework (2024).

## **10. NONSC Compliance - Height Limitation on Buildings & Structures**

Compliance - Height Limitation on Buildings & Structures

No building or structure of the development hereby permitted shall exceed 67.95m Above Ordnance Datum (AOD).

### **REASON**

To ensure the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport or NATS En-route PLC, through interference with communication, navigational aids and surveillance equipment, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

## **11. NONSC Compliance - Use Class E / F.2 Operation Hours**

Compliance - Use Class E or F.2 Operation Hours

The ground floor Use Class E or F.2 premises hereby approved as part of Blocks A1 and A2 (Phase 1) shall only be open to the public between the following hours:-

06:00 to 23:00 hours, Mondays to Saturdays and  
10:00 to 18:00 hours on Sundays.

### **REASON**

To safeguard the residential amenity of the occupiers of adjoining and nearby properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

## **12. NONSC Compliance - Use Class E / F.2 Servicing Hours**

Compliance - Use Class E or F.2 Servicing Hours

There shall be no loading or unloading of vehicles (including the collection of waste) from the ground floor Use Class E or F.2 premises hereby approved as part of Blocks A1 and A2 (Phase 1) outside of the hours of:-

0700 and 2300 hours, Monday to Saturday, and  
09:00 and 18:00 hours on Sundays, Public or Bank Holidays.

### **REASON**

To safeguard the residential amenity of the occupiers of adjoining and nearby properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

## **13. NONSC Compliance - M4(2) & M4(3) Accessible Units**

Compliance - M4(2) & M4(3) Accessible Units

The development hereby approved shall ensure that 10% of the residential units are constructed to meet the standards for Category 3 M4(3) dwellings, with all remaining units designed to the standards for Category 2 M4(2) dwellings, as set out in Approved Document M to the Building Regulations (2010) 2015 (or as amended), and all such provisions shall remain in place for the life of the building.

#### REASON

To ensure that sufficient housing stock is provided, in accordance with Policy DMHB 16 of the Hillingdon Local Plan: Part 2 (2020) and Policies D5 and D7 of the London Plan (2021).

#### **14. NONSC Compliance - Noise (Plant Noise Mitigation)**

Compliance - Noise (Plant Noise Mitigation)

For the lifetime of the development hereby permitted, the sound rating level (LAr) of noise caused by plant serving the development shall not exceed 40 dB LAr 15 min for any fifteen-minute period between 2300 and 0700, and 50 dB LAr 1 hour for any one-hour period between 0700 and 2300, determined one metre free field external to any window or door of any permanent residential, or equivalently noise sensitive premises, in accordance with 'Methods for rating and assessing industrial and commercial sound' British Standards Institution BS4142 2014+A1 2019.

#### REASON

To ensure a satisfactory living environment is achieved, in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) and Policy D14 of the London Plan (2021).

#### **15. NONSC Compliance - Noise (Sound Insulation of Building)**

Compliance - Noise (Sound Insulation of Building)

For the lifetime of the development hereby permitted, the noise level shall not exceed 35 dB LAeq 16 hrs between 0700 and 2300 and 30 dB LAeq 8 hrs, between 2300 and 0700, measured inside any room of any permitted dwelling whilst achieving acceptable internal living conditions with respect to ventilation and temperature. This has regard to the guidance set out in 'Guidance on Sound Insulation and Noise Reduction for Buildings' British Standard Institution BS8233: 2014.

#### REASON

To ensure a satisfactory living environment is achieved, in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020) and Policy D14 of the London Plan (2021).

#### **16. NONSC Compliance - Digital Connectivity Infrastructure**

Compliance - Digital Connectivity Infrastructure

The development hereby approved shall ensure that sufficient ducting space for full fibre connectivity infrastructure is provided.

**REASON**

To ensure compliance with Policy SI 6 of the London Plan (2021).

**17. NONSC Compliance - Connection to Future District Heating Network**

Compliance - Connection to Future District Heating Network

The development hereby approved shall have provision to connect to a district heating network should one become available in future and should it be viable to do so.

**REASON**

To ensure compliance with Policy SI 3 of the London Plan (2021).

**18. NONSC Compliance - Non-Road Mobile Machinery**

Compliance - Non-Road Mobile Machinery

All Non-Road Mobile Machinery (NRMM) of net power of 37kW and up to and including 560kW used during the course of the demolition, site preparation and construction phases shall comply with the emission standards set out in chapter 7 of the GLA's supplementary planning guidance "Control of Dust and Emissions During Construction and Demolition" dated July 2014 (SPG), or subsequent guidance. Unless it complies with the standards set out in the SPG, no NRMM shall be on site, at any time, whether in use or not, without the prior written consent of the local planning authority. The developer shall keep an up to date list of all NRMM used during the demolition, site preparation and construction phases of the development on the online register at <https://nrmm.london/>."

**REASON**

To comply with the London's Low Emission Zone for non-road mobile machinery as per requirements of the London Environment Strategy, in accordance with Policy EM8 of the Hillingdon Local Plan: Part 1 (2012), Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 1 of the London Plan (2021) and the National Planning Policy Framework (2024).

**19. NONSC Compliance - Use of Water**

Compliance - Use of Water

(i) The residential development hereby approved shall incorporate measures to minimise the use of mains water in line with the Optional Requirement of the Building Regulations, achieving mains water consumption of 105 litres or less per head per day (excluding allowance of up to five litres for external water consumption). Measures shall include smart

metering, water saving and recycling measures, including retrofitting, to help to achieve lower water consumption rates and to maximise future-proofing.

(ii) The non-residential development hereby approved shall achieve at least the BREEAM excellent standard for the 'Wat 01' water category.

#### REASON

In order to minimise the use of mains water, water supplies and resources should be protected and conserved in a sustainable manner, in compliance with Policy SI 5 of the London Plan (2021).

#### **20. NONSC Compliance - Parking spaces leased & not sold**

Compliance - Parking spaces leased & not sold

All commercial and residential car parking spaces for occupants of the development shall be leased and not sold.

#### REASON

To accord with Policy T6.1, part (B), of the London Plan (2021).

#### **21. COM10 Compliance - Tree Retention**

Compliance - Tree Retention

Trees, hedges and shrubs shown to be retained on the approved plans shall not be damaged, uprooted, felled, lopped or topped without the prior written consent of the Local Planning Authority. If any retained tree, hedge or shrub is removed or severely damaged during construction, or is found to be seriously diseased or dying another tree, hedge or shrub shall be planted at the same place or, if planting in the same place would leave the new tree, hedge or shrub susceptible to disease, then the planting should be in a position to be first agreed in writing with the Local Planning Authority and shall be of a size and species to be agreed in writing by the Local Planning Authority and shall be planted in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier. Where damage is less severe, a schedule of remedial works necessary to ameliorate the effect of damage by tree surgery, feeding or groundwork shall be agreed in writing with the Local Planning Authority. New planting should comply with BS 3936 (1992) 'Nursery Stock, Part 1, Specification for Trees and Shrubs'. Remedial work should be carried out to BS BS 3998:2010 'Tree work - Recommendations' and BS 4428 (1989) 'Code of Practice for General Landscape Operations (Excluding Hard Surfaces)'. The agreed work shall be completed in the first planting season following the completion of the development or the occupation of the buildings, whichever is the earlier.

#### REASON

To ensure that the trees and other vegetation continue to make a valuable contribution to the amenity of the area in accordance with Policy DMHB 14 of the Hillingdon Local Plan Part 2

(2020) and to comply with Section 197 of the Town and Country Planning Act 1990.

## **22. NONSC Reserved Matters - Design Code**

### Reserved Matters - Design Code

Notwithstanding the Design Code framework hereby approved, the first application for reserved matters shall be accompanied by a final detailed Design Code, which shall be submitted to and approved in writing by the Local Planning Authority. The final detailed Design Code shall ensure that a high-quality development will be delivered, with further details required in respect of the following matters:-

- (i) Public Realm and Landscape
  - (a) Play Space
  - (b) The Gateway, The Social Heart and The Nurture Garden
  - (c) Street frontages.
  - (d) Podiums
  - (e) Access and Movement
  
- (ii) Built Form
  - (a) Street Proportions
  - (b) Character and Appearance

Thereafter, each application for approval of reserved matters shall be accompanied by the approved final detailed Design Code and shall accord with the approved details. The development shall be constructed in accordance with the approved details, prior to occupation of each phase, and shall be retained as such for as long as the development remains in existence.

### REASON

To ensure that the development creates high quality, beautiful and sustainable buildings and places, in accordance with the provisions of Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2021).

## **23. NONSC Reserved Matters - Daylight & Sunlight Report**

### Reserved Matters - Daylight & Sunlight Report

Each application for reserved matters shall be accompanied by a final detailed Daylight and Sunlight Report for the development, or each development phase, which shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail mitigation measures where appropriate.

Thereafter the development shall be constructed in accordance with the approved details, prior to occupation of the relevant phase, and be retained as such.

## REASON

In order to ensure that daylight and sunlight conditions have been mitigated against where necessary so as to not compromise the comfort and enjoyment of the development and surrounding areas around the building, in accordance with Policy D9 of the London Plan (2021).

### **24. NONSC Reserved Matters - Microclimate & Wind Report**

#### Reserved Matters - Microclimate & Wind Report

Each application for reserved matters shall be accompanied by a final detailed Microclimate and Wind Report for the development, or each development phase, which shall be submitted to and approved in writing by the Local Planning Authority. The report shall detail mitigation measures where appropriate.

Thereafter the development shall be constructed in accordance with the approved details, prior to occupation of the relevant phase, and be retained as such.

## REASON

In order to ensure that microclimate and wind conditions have been mitigated against where necessary so as to not compromise the comfort and enjoyment of the development and surrounding areas around the building, in accordance with Policy D9 of the London Plan (2021).

### **25. NONSC Reserved Matters - Energy Statement**

#### Reserved Matters - Energy Statement

Each application for reserved matters shall be accompanied by an updated Energy Statement for the development, or each development phase, which shall be submitted to and approved in writing by the Local Planning Authority. The report shall accord with the requirements of the London Plan (policy SI2) and the GLA Energy Assessment Guidance (June 2022 or as amended) and demonstrate that the development will maximise savings in CO2 emissions (achieving at least 35% on-site) from the regulated energy load.

Thereafter the development shall be constructed in accordance with the approved details, prior to occupation of the relevant phase, and be retained as such.

## REASON

To ensure the development's onsite carbon savings from regulated energy demand is achieved in perpetuity (i.e. annually over 30years) in accordance with the Policy SI2 of the London Plan (2021).

### **26. NONSC Reserved Matters - Circular Economy Statement**

#### Reserved Matters - Circular Economy Statement

Each application for reserved matters shall be accompanied by a detailed Circular Economy Statement in line with the GLA's Circular Economy Statement Guidance, which shall be submitted to and approved in writing by the Local Planning Authority. The statement shall adhere to the principles set out in the outline Circular Economy Statement.

The development shall be carried out in accordance with the details so approved.

#### REASON

In the interests of sustainable waste management and in order to maximise the re-use of materials, in accordance with Policy SI 7 of the London Plan (2021).

### **27. NONSC Reserved Matters - Whole Life-Cycle Carbon Statement**

#### Reserved Matters - Whole Life-Cycle Carbon Statement

Each application for reserved matters shall be accompanied by a detailed Whole Life-Cycle Carbon Statement in line with the GLA's Whole Life-Cycle Assessment Guidance, which shall be submitted to and approved in writing by the Local Planning Authority. The statement shall adhere to the principles set out in the outline Whole Life-Cycle Carbon Statement.

The development shall be carried out in accordance with the details so approved.

#### REASON

In the interests of sustainable development and to maximise on-site carbon dioxide savings, in accordance with Policy SI 2 of the London Plan (2021).

### **28. NONSC Pre-Commencement - Demolition & Construction Plan**

#### Pre-Commencement - Demolition & Construction Plan

(A) Prior to the commencement of demolition works on site for the development, or each development phase, a Demolition Management, Logistics Plan and Environmental Management Plan for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority (in consultation with relevant stakeholders). The demolition works shall be carried out in strict accordance with the approved plan.

(B) Prior to commencement of any construction works for the development, or each development phase, including sub-surface works for the construction of the approved details, a Construction Management, Logistics Plan and Environmental Management Plan for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority (in consultation with relevant stakeholders). The construction works shall be carried out in strict accordance with the approved plan.

The plans referred to in Parts (A) and (B) shall detail:

- i. The phasing of the works;
- ii. The hours of work;
- iii. On-site plant and equipment;
- iv. Measures to mitigate noise and vibration;
- v. Measures to mitigate impact on air quality;
- vi. Waste management;
- vii. Site transportation and traffic management, including:
  - a. HGV Routing enforcement;
  - b. Signage;
  - c. Vehicle types and sizes;
  - d. Hours of arrivals and departures of staff and deliveries (avoiding peaks);
  - e. Frequency of visits;
  - f. Parking of site operative vehicles;
  - g. On-site loading/unloading and wheel washing arrangements;
    - h. Use of an onsite banksman (if applicable);
    - i. Use of consolidation centres to reduce HGV movements;
    - j. Achieve FORS Gold standard and 5\* Direct Vision Standard;
    - k. Encourage use of active travel;
- viii. The arrangement for monitoring and responding to complaints relating to demolition and construction;
- ix. Details of cranes and other tall construction equipment (including the details of obstacle lighting);
- x. Environmental Management Plan containing details of pollution and ground water protection measures relating, but not limited to, wind blow, seepage or spillage at the site during demolition, remediation and construction works. Works hours should also be carried out at appropriate times to avoid adverse impacts to nesting birds/bats.

This plan should accord with Transport for London's Construction Logistic Planning Guidance and the GLA's 'The Control of Dust and Emissions during Construction and Demolition' Supplementary Planning Guidance (July 2014) (or any successor document). It shall cover the entirety of the application site and any adjoining land which will be used during the construction period. It shall include the details of cranes and any other tall construction equipment (including the details of obstacle lighting).

Thereafter, the demolition and construction works shall be carried out in strict accordance with the approved plans.

#### REASON

To safeguard the amenity of surrounding areas and to ensure that the construction works include appropriate efficiency and sustainability measures so as not to compromise the safe and efficient operation of the local highway network and local air quality, in accordance with Policies DMT 1, DMT 2 and DME1 14 of the Hillingdon Local Plan: Part 2 (2020) and Policies D14, SI 1, T4 and T7 of the London Plan (2021). To ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic

movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020). To ensure that the development mitigates impact on the Grand Union Canal Site of Importance for Nature Conservation, in accordance with Policy DMEI 7 of the Hillingdon Local Plan: Part 2 (2020).

## **29. NONSC Pre-Commencement - Contaminated Land**

### **Pre-Commencement - Contaminated Land**

(i) Prior to the commencement of the development (excluding demolition, site clearance and initial ground investigation works), or each development phase, a scheme to deal with contamination for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority (LPA). All works which form part of the remediation scheme shall be completed before any part of the development, or development phase is occupied or brought into use unless the Local Planning Authority dispenses with any such requirement specifically and in writing. The scheme shall include the following measures unless the LPA dispenses with any such requirement specifically and in writing:

(a) A further site investigation, including where relevant soil, soil gas, surface water and groundwater sampling, together with the results of analysis and risk assessment shall be carried out by a suitably qualified and accredited consultant/contractor. The report should also clearly identify all risks, limitations and recommendations for remedial measures to make the site suitable for the proposed use; and

(b) A written method statement providing details of the remediation scheme and how the completion of the remedial works will be verified shall be agreed in writing with the LPA prior to commencement, along with the details of a watching brief to address undiscovered contamination. No deviation shall be made from this scheme without the express agreement of the LPA prior to its implementation.

(ii) If during remedial or development works contamination not addressed in the submitted remediation scheme is identified an addendum to the remediation scheme shall be agreed with the LPA prior to implementation; and

(iii) Upon completion of the approved remedial works, this condition will not be discharged until a comprehensive verification report has been submitted to and approved by the LPA. The report shall include the details of the final remediation works and their verification to show that the works have been carried out in full and in accordance with the approved methodology.

(iv) No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping and/or engineering purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the factual results and interpretive reports of this testing shall be submitted to and approved in writing by the Local Planning Authority.

## REASON

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with Hillingdon Local Plan: Part 2 (January 2020) Policies - DMEI 11: Protection of Ground Water Resources and DMEI 12: Development of Land Affected by Contamination.

### **30. NONSC Pre-Commencement - Written Scheme of Investigation**

#### Pre-Commencement - Written Scheme of Investigation

Prior to commencement of the development, or development phase, a specialist Palaeolithic/Pleistocene assessment for the development, or development phase, shall be carried out in accordance with a stage 1 Written Scheme of Investigation (WSI) and shall be submitted to and approved in writing by the Local Planning Authority (in consultation with the Greater London Archaeological Advisory Service (GLAAS)).

If the Palaeolithic/Pleistocene assessment identifies significant potential and development impact on that potential then for those elements of the development which may impact a stage 2 WSI shall be submitted to and approved in writing by the Local Planning Authority (in consultation with GLAAS). For those elements of the development that are included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. Details of foundations and other groundworks

C. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. This part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

## REASON

To secure the provision of archaeological investigation and the subsequent recording of the remains prior to development, in accordance with Policy DMHB 7 of the Hillingdon Local Plan: Part 2 (2020), Policy HC1 of the London Plan (2021) and Chapter 16 of the National Planning Policy Framework (2024)

### **31. NONSC Pre-Commencement - Piling Method Statement**

#### Pre-Commencement - Piling Method Statement

Prior to the commencement of the development, or each development phase, a Piling Method Statement for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Thames Water).

This shall detail:-

- (i) depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure; and
- (ii) the programme for the works and piling layout plan including all Thames Water wastewater assets, the local topography and clearance between the face of the pile to the face of a pipe.

Any piling must be undertaken in accordance with the terms of the approved piling method statement and piling layout plan.

#### REASON

The proposed works will be in close proximity to underground sewerage utility infrastructure and piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure. The development is required to comply with Policy SI 5 of the London Plan (2021).

### **32. NONSC Pre-Commencement - Tree Protection**

#### Pre-Commencement - Tree Protection

Prior to the commencement of the development, or each development phase, tree protection details for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority. Details shall include:-

- (i) A method statement outlining the sequence of development on the site including demolition, building works and tree protection measures.
- (ii) Detailed drawings showing the position and type of fencing to protect the entire root areas/crown spread of trees, hedges and other vegetation to be retained shall be submitted to the Local Planning Authority for approval. No site clearance works or development within a phase containing trees to be retained, shall be commenced until these drawings have been approved and the fencing has been erected in accordance with the details approved. Unless otherwise agreed in writing by the Local Planning Authority, such fencing should be a minimum height of 1.5 metres.

Thereafter, the development shall be implemented in accordance with the approved details.

The fencing shall be retained in position until the development or relevant phase containing retained trees is completed.

The area within the approved protective fencing shall remain undisturbed during the course

of the works within the relevant phase and in particular in these areas:

- (iii)(a) There shall be no changes in ground levels;
- (iii)(b) No materials or plant shall be stored;
- (iii)(c) No buildings or temporary buildings shall be erected or stationed;
- (iii)(d) No materials or waste shall be burnt; and.
- (iii)(e) No drain runs or other trenches shall be dug or otherwise created, without the prior written consent of the Local Planning Authority.

(iv) Where the arboricultural method statement recommends that the tree protection measures for a site will be monitored and supervised by an arboricultural consultant at key stages of the development, records of the site inspections / meetings shall be submitted to the Local Planning Authority.

#### REASON

To ensure that trees and other vegetation can and will be retained on site and not damaged during construction work and to ensure that the development conforms with Policy DMHB 14 of the Hillingdon Local Plan Part 2 (2020).

### **33. NONSC Pre-Commencement - Radar Mitigation Scheme**

#### Pre-Commencement - Radar Mitigation Scheme

(A) Prior to the commencement of any construction works for the development, or each development phase, a Radar Mitigation Scheme (RMS) (including a timetable for its implementation during construction) for the development, or development phase, shall be agreed with the Operator and approved in writing by the Local Planning Authority (in consultation with the National Air Traffic Services and Heathrow Airport Safeguarding).

(B) No construction work shall be carried out above 10m Above Ground Level (~42m AOD) unless and until the approved Radar Mitigation Scheme has been implemented and the development shall thereafter be operated fully in accordance with such approved Scheme.

#### REASON

To ensure the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport or NATS En-route PLC, through interference with communication, navigational aids and surveillance equipment, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

### **34. NONSC Pre-Commencement - North Hyde Road Pedestrian Crossing**

#### Pre-Commencement - North Hyde Road Pedestrian Crossing

(i) Prior to commencement of any works, details of a full Road Safety Audit of the North Hyde Road pedestrian crossing shall be submitted to and approved in writing by the Local Planning Authority. The crossing shall also be designed so it does not impact on the safe

operation of buses.

(ii) Prior to the commencement of Phase 1 works, the final design of the North Hyde Road pedestrian crossing shall be submitted to and approved in writing by the Local Planning Authority.

(iii) Prior to the occupation of Phase 1, the North Hyde Road pedestrian crossing shall be completed and maintained in full accordance with the approved details.

#### REASON

To ensure appropriate servicing of the site, to safeguard highway safety and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) and Policies T3 and T7 of the London Plan (2021).

### **35. NONSC Pre-Commencement - Materials**

#### Pre-Commencement - Materials

Prior to commencement of the development, or each development phase, above ground level, details and samples of materials for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority. This shall include (but is not limited to):

- (i) Details and samples of all new external materials, including brickwork, bonding, pointing style, mortar mix, roofing materials, rainwater goods;
- (ii) Details of external pipe work, flues and vents;
- (iii) Detailed drawings of fenestration and doors, including profiles of all new windows, external doors, together with information on materials, glazing and finishes;
- (iv) Detailed drawing including profile of the door entrance canopy with materials and finish;
- (v) Comprehensive colour scheme for all built details;
- (vi) Details of the materials palette should be provided with reference to paver types intended for use within the public realm and a methodology statement is required to ensure that all materials could be installed in accordance with the tolerances set out in BS8300:2018; and
- (vii) Make, product/type, colour and photographs/images.

Thereafter the development shall be constructed in accordance with the approved details prior to occupation and be retained as such.

#### REASON

To ensure that the development presents a satisfactory appearance in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

### **36. COM9 Pre-Commencement - Landscape Scheme**

#### Pre-Commencement - Landscape Scheme

Prior to commencement of the development, or each development phase, a final landscape scheme for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority, in consultation with relevant stakeholders (including the Heathrow Airport Safeguarding and Transport for London). The scheme shall include:-

(i) Details of Soft Landscaping

(i)(a) Planting plans (at not less than a scale of 1:100), including pollution absorbing species

(i)(b) Written specification of planting and cultivation works to be undertaken

(i)(c) Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate

(ii) Details of Hard Landscaping

(ii)(a) Refuse Storage

(ii)(b) Cycle Storage (in accordance with London Cycling Design Standards, including provision for larger and adapted cycles)

(ii)(c) Full details of the means of enclosure and boundary treatments, including product details with materials and finish

(ii)(d) Car Parking Layouts, including standard parking, disabled persons' parking and motorcycle parking (in accordance with London Plan requirements)

(ii)(e) Hard Surfacing Materials (including traffic calming measures, and the external areas and amenity areas which would be accessible to older and disabled people, including wheelchair users)

(ii)(f) External Lighting

(ii)(g) Other structures (including the access gate(s), play space, alongside accessible and inclusive equipment provisions (i.e. sensory impairment and complex multiple disabilities))

(ii)(h) Millington Road and North Hyde Road highway improvement works

(iii) Details of Landscape Maintenance

(iii)(a) Landscape Maintenance Schedule for a minimum period of 5 years

(iii)(b) Proposals for the replacement of any tree, shrub, or area of turfing/seeding within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased

(iv) Schedule for Implementation

(v) Other

(v)(a) Existing and proposed functional services above and below ground

(v)(b) Proposed finishing levels or contours (including internal and external levels, noting that there may be scope to reduce the extent and/or location of the external ramps)

(vi) Confirmation of the final Urban Greening Factor (UGF) score (minimum 0.4 UGF score)

Details must comply with Advice Note 3, 'Wildlife Hazards' available at

(<http://www.aoa.org.uk/wp-content/uploads/2016/09/AdviceNote-3-Wildlife-Hazards->

2016.pdf).

Thereafter the development shall be constructed in accordance with the approved details, prior to occupation of the relevant phase, and be retained as such.

#### REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with Policies DMHB 11, DMHB 12, DMHB 14, DMT 2, DMT 6 and DMEI 1 of the Hillingdon Local Plan: Part 2 (2020) and Policies G1, G5, T5, T6, T6.2 and T7 of the London Plan (2021). Also, to avoid endangering the safe movement of aircraft and the operation of Heathrow Airport, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

### **37. NONSC Pre-Commencement - Public Art**

#### Pre-Commencement - Public Art

(i) Prior to commencement of above ground construction works for the development, an outline public art scheme for the development shall be submitted to and approved in writing by the Local Planning Authority.

(ii) Prior to commencement of above ground construction works for the development, or each development phase, a final and detailed public art scheme for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter each phase of the development shall be constructed in accordance with the approved details prior to occupation of the relevant phase and shall be retained as such.

#### REASON

To ensure that the development delivers a high-quality piece of public art, in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 (2020).

### **38. NONSC Pre-Commencement - Play Area Details**

#### Pre-Commencement - Play Area Details

Prior to commencement of above ground construction works for the development, or each development phase, details of the play spaces for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority. This should include details of accessible play equipment for disabled children, including those with a sensory impairment, or complex multiple disabilities. The play spaces should be inclusive, safe, accessible, non-segregated, diverse and high-quality.

Thereafter each phase of the development shall be constructed in accordance with the approved details prior to occupation of the relevant phase and shall be retained as such.

## REASON

To ensure that the development makes adequate provision of children's play space in accordance with Policies DMHB 19 and DMCI 5 of the Hillingdon Local Plan: Part 2 (2020) and Policies S4 and D5 of the London Plan (2021).

### **39. NONSC Pre-Commencement - Biodiversity Net Gain**

#### Pre-Commencement - Biodiversity Net Gain

Prior to commencement of above ground construction works for the development, or each development phase, a Biodiversity Gain Plan for the development, or development phase, demonstrating compliance with the 10% biodiversity net gain requirement in accordance with the Environment Act 2021, shall be submitted to and approved in writing by the Local Planning Authority. The Biodiversity Gain Plan should include:

- i. Baseline Biodiversity Assessment: Using the latest Defra Biodiversity Metric, a report of the site's pre-development biodiversity value including the site watercourse units; and
- ii. On-Site Enhancement and 30-year Habitat Management Plan (HMP) detailing measures to achieve BNG on-site, including species protection, habitat creation, and ongoing management strategies to maintain gains for a minimum of 30 years. The HMP should, as a minimum, include:
  - a) Description and evaluation of the features to be managed.
  - b) Aims, objectives and targets for management.
  - c) Description of the management operations necessary to achieving aims and objectives.
  - d) Prescriptions for management actions.
  - e) Preparation of a works schedule, including an annual works schedule.
  - f) Details of the monitoring needed to measure the effectiveness of management.
  - g) Details of the timetable for each element of the monitoring programme.
  - h) Details of the persons responsible for the implementation and monitoring.
  - i) Report to the Council routinely regarding the state of the Biodiversity Net Gain requirements for development in years 1 (post-completion), 3, 5, 10, 20, and 30, with biodiversity reconciliation calculations at each stage; or

Where a biodiversity net gain of 10% is not achievable on site and/or the proposal results in the loss of watercourse units (e.g. the existing pond proposed for removal), in addition to the Baseline Biodiversity Assessment (i), the following shall be included in the BGP:

- iii. Off-Site Biodiversity Credits or Statutory Credits: Where on-site measures do not achieve the 10% net gain and/or results in the loss of watercourse units (e.g. the existing pond proposed for removal), confirmation of the purchase of off-site biodiversity credits or statutory credits must be provided, including a receipt or proof of transaction as part of the Plan.

Thereafter each phase of the development shall be constructed and operated in accordance with the approved details prior to occupation of the relevant phase and shall be retained as such.

#### REASON

To ensure the development delivers a Biodiversity Net Gain and secures the protection and effective management of the remaining habitat on site in accordance with Section 15 of the National Planning Policy Framework, Policy G6 of The London Plan (2021), and Policy DMEI 7 of the Hillingdon Local Plan Part 2 (2020).

#### **40. NONSC Pre-Commencement - Bird Hazard Management Plan**

##### Pre-Commencement - Bird Hazard Management Plan

Prior to commencement of above ground construction works for the development, or each development phase, a Bird Hazard Management Plan shall be submitted to and approved in writing by the Local Planning Authority (in consultation with Heathrow Airport Safeguarding). The submitted plan shall include details of:

- Management of any flat/shallow pitched/green roofs on buildings within the site which may be attractive to nesting, roosting and "loafing" birds.

Thereafter the development shall be implemented and retained/maintained in accordance with these details, prior to occupation of the relevant phase, for as long as the development remains in existence.

#### REASON

To limit the potential of the site to attract and support populations of those bird species that may cause detriment to aviation safety, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

#### **41. NONSC Pre-Commencement - Energy Monitoring, Recording & Reporting**

##### Pre-Commencement - Energy Monitoring, Recording & Reporting

Prior to commencement of above ground works for the development, or each development phase, a final detailed Energy Monitoring, Recording and Reporting Plan (alongside the approved Energy Statement) for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority. The plan shall accord with the requirements of the London Plan (policy SI2) and the GLA Energy Assessment Guidance (June 2022 or as amended) and demonstrate that the development will maximise savings in CO2 emissions (achieving at least 35% on-site) from the regulated energy load in accordance with the approved energy strategy.

Thereafter the development shall be implemented and retained/maintained in accordance with these details, prior to occupation of the relevant phase, for as long as the development remains in existence.

## REASON

To ensure the development's onsite carbon savings from regulated energy demand is achieved in perpetuity (i.e. annually over 30years) in accordance with the Policy SI2 of the London Plan (2021).

### **42. NONSC Pre-Commencement - Overheating**

#### Pre-Commencement - Overheating

Prior to commencement of above ground works for the development, or each development phase, the final Overheating Strategy for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority. The submission shall demonstrate how the development will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the following cooling hierarchy:

- 1) reduce the amount of heat entering a building through orientation, shading, high albedo materials, fenestration, insulation and the provision of green infrastructure;
- 2) minimise internal heat generation through energy efficient design;
- 3) manage the heat within the building through exposed internal thermal mass and high ceilings;
- 4) provide passive ventilation;
- 5) provide mechanical ventilation; and
- 6) provide active cooling systems.

Thereafter the development shall be implemented and retained/maintained in accordance with these details, prior to occupation of the relevant phase, for as long as the development remains in existence.

## REASON

To demonstrate that the final strategy will reduce the potential for internal overheating and reliance on air conditioning systems in accordance with the cooling hierarchy and Policy SI 4 of the London Plan (2021).

### **43. NONSC Pre-Commencement - Sustainable Drainage Scheme Details**

#### Pre-Commencement - Sustainable Drainage Scheme Details

Prior to commencement of the development (except for demolition, ground and enabling work), or each development phase, a sustainable water management scheme for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority in consultation with the relevant stakeholders. The scheme shall clearly demonstrate how it manages water and demonstrate ways of controlling the surface water on site by providing information on:

- a) Sustainable Drainage features:

- i. Surface water discharge - the submitted drainage strategy must identify the proposed method and location of discharging collected surface water from the site in accordance with the hierarchy set out in Policy SI 13 of the London Plan (2021). Where the proposal does not utilise the most sustainable solution, justification must be provided.
- ii. SuDS - the submitted drainage strategy should incorporate Sustainable Drainage System (SuDS) elements that are embedded, where practicable, within the landscaping plan for the development. Preference should be given to above-ground SuDS elements that control water at source and provide wider biodiversity, water quality and amenity benefits.
- iii. Runoff rates - provide the greenfield and proposed runoff rates for a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus 40% climate change. Developments should aim to meet greenfield runoff rates unless a suitable justification can be provided.
- iv. Drainage calculations - include calculations to demonstrate that the volume of storage and size of drainage features provided is adequate to control surface water for a range of storm duration and rainfall intensities for the entire site area for events up to and including the critical 1 in 100 plus 40% climate change rainfall event.
- v. Exceedance routes - provide a plan showing the route surface water will take through the development for rainfall events exceeding the 1 in 100 year event. Where it is intended to store water on the ground surface, the maximum extent of overland flooding should be mapped and the depth of the flooding confirmed. Safe access and egress for the site must be demonstrated.

b) Long-term management and maintenance of the drainage system.

- i. Provide a Management and Maintenance Plan for the drainage system that includes clear plans showing all of the drainage network above and below ground, and identifies the responsibility of different parties for each component of the drainage network.
- ii. Include details of the necessary inspection regimes and maintenance frequencies.

Thereafter the development shall be implemented and retained/maintained in accordance with these details, prior to occupation of the relevant phase, for as long as the development remains in existence.

#### REASON

To ensure that surface water run off is controlled and to ensure the development does not increase flood risk, in compliance with Policy EM6 of the Hillingdon Local Plan: Part 1 (2012), Policy DME1 9 and DME1 10 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 12 and SI 13 of the London Plan (2021), the National Planning Policy Framework (2024), and Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

#### **44. NONSC Pre-Occupation - Sustainable Drainage Scheme Verification**

##### Pre-Occupation - Sustainable Drainage Scheme Verification

Prior to the occupation of the development, or each development phase, evidence (photographs and installation contracts) to demonstrate that the sustainable drainage scheme for the site has been completed in accordance with the submitted details shall be submitted to and approved in writing by the Local Planning Authority. The sustainable drainage scheme shall be managed and maintained thereafter in accordance with the agreed management and maintenance plan for all of the proposed drainage components.

##### REASON

To ensure that surface water run off is controlled and to ensure the development does not increase flood risk, in compliance with Policy EM6 of the Hillingdon Local Plan: Part 1 (2012), Policy DME1 9 and DME1 10 of the Hillingdon Local Plan: Part 2 (2020), Policy SI 12 and SI 13 of the London Plan (2021), the National Planning Policy Framework (2024), and Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

#### **45. NONSC Pre-Occupation - Glint & Glare Assessment**

##### Pre-Occupation - Glint & Glare Assessment

Prior to the occupation of the development, or each development phase, a glint and glare assessment for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter the development shall be implemented and retained/maintained in accordance with these details, prior to occupation of the relevant phase, for as long as the development remains in existence.

##### REASON

To ensure the development does not endanger the safe movement of aircraft or the operation of Heathrow Airport. The airport requires a glint and glare assessment to be completed to determine the full impact on Air Traffic Control Tower and pilots approaching the airport, in accordance with Policy DMAV 1 of the Hillingdon Local Plan: Part 2 (2020).

#### **46. NONSC Pre-Occupation - Commercial Floorspace Fit-Out Condition**

##### Pre-Occupation - Commercial Floorspace Fit-Out Condition

(i) The Phase 1 residential units shall not be occupied until the commercial space has been completed to at least Category A fit-out standard.

(ii) Prior to the occupation of Phase 1 residential units, evidence of Category A fit-out completion for the commercial space shall be submitted to and approved in writing by the Local Planning Authority.

(iii) If the Phase 1 commercial space has not been occupied within 8 months of the occupation of the Phase 1 residential units, the commercial space shall be fit out to at least Category A+ standard within 12 months of the occupation of the Phase 1 residential units. Within 1 month of completion, evidence of Category A+ fit-out completion for the commercial space shall be submitted to and approved in writing by the Local Planning Authority.

#### REASON

To ensure the delivery of the commercial space early in the development programme, in order to deliver the design and social benefit secured as part of that development, in accordance with Policies DMHB 11 and DMCI 2 of the Hillingdon Local Plan: Part 2 (2020) and Policy E3 of the London Plan (2021).

#### **47. NONSC Pre-Occupation - Thames Water Condition**

##### Pre-Occupation - Thames Water Condition

No development shall be occupied until confirmation has been provided that:-

(i) Foul water capacity exists off site to serve the development; or

(ii) A development and infrastructure phasing plan has been agreed with the Local Authority in consultation with Thames Water. Where a development and infrastructure phasing plan is agreed, no occupation shall take place other than in accordance with the agreed development and infrastructure phasing plan; or

(iii) All Foul water network upgrades required to accommodate the additional flows from the development have been completed.

#### REASON

Network reinforcement works may be required to accommodate the proposed development. Any reinforcement works identified will be necessary in order to avoid sewage flooding and/or potential pollution incidents. The development is required to comply with Policy SI 5 of the London Plan (2021).

#### **48. NONSC Pre-Occupation - Delivery, Servicing & Waste Management Plan**

##### Pre-Occupation - Delivery, Servicing & Waste Management Plan

Prior to the first occupation of the development, or each development phase, the final comprehensive Delivery, Servicing and Waste Management Plan for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority. The Plan shall accord with Transport for London's Delivery and Servicing Plan Guidance and shall include, but not be limited to:

(i) Swept Path Analysis -

(a) A full tracked swept path analysis demonstrating that a 27-tonne refuse collection vehicle can safely enter the site, manoeuvre (including completing a compliant three-point turn), service all bin stores, and exit the site in forward gear. The analysis shall reflect any access constraints identified in the submitted Fire Safety documentation.

(ii) Bin Capacities and Provision

(a) Details confirming the correct use of 140L food waste bins and the agreed number of bins per block, following consultation with the Waste and Recycling Team.

(b) Details of 1100L metal bulk bins for general waste and recycling, confirming that any externally-sourced bins will be metal.

(iii) Waste Storage Layout and Access

(a) Scaled plans showing all bin store locations, internal layouts, clearances for bin lid opening, and space for bin rotation.

(b) Confirmation that bin stores are located no more than 30 metres from residents' front doors.

(iv) Pull Distances and Crew Access

(a) Demonstration that all bins can be moved by collection crews over a maximum 10-metre pull distance via a smooth, impermeable route with a gradient not exceeding 1:12, without obstruction from parked vehicles.

(b) Provision of a dropped kerb and buffer strips where routes run adjacent to walls.

(v) Bin Store Design and Security

(a) Details confirming outward-opening bin store doors and low-level exit buttons positioned to prevent entrapment.

(b) Provision of one full set of keys/fobs/gate codes per waste stream (general waste, recycling, food waste) for operational use by Council crews.

The development shall not be occupied until the approved Plan has been fully implemented in accordance with the approved details, and the approved arrangements shall thereafter be retained, maintained and kept available for their intended purpose for the lifetime of the development.

## REASON

To ensure appropriate servicing of the site, to safeguard highway safety and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) and Policy T7 of the London Plan (2021).

## 49. NONSC Pre-Occupation - Travel Plans

### Pre-Occupation - Travel Plans

Prior to the first occupation of the development, or each development phase, the final comprehensive Residential Travel Plan and Commercial Travel Plan for the development, or development phase, shall be submitted to and approved in writing by the Local Planning

Authority. This shall require a 56% sustainable mode-share target for outer London and include robust measures to achieve modal shift.

Thereafter the development shall be implemented and retained/maintained in accordance with these details, prior to occupation of the relevant phase, for as long as the development remains in existence.

#### REASON

To maximise sustainable travel and safeguard highway safety and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) and Policies T1 and T4 of the London Plan (2021).

### **50. NONSC Pre-Occupation - Parking Design & Management Plan**

#### Pre-Occupation - Parking Design & Management Plan

Prior to the first occupation of the development, or each development phase, a Parking Design and Management Plan shall be submitted to and approved in writing by the Local Planning Authority. This Plan shall:-

- (i) Detail car parking provision, indicating how the car parking will be designed and managed, with reference to Transport for London guidance on parking management and parking design;
- (ii) Ensure that parking spaces are allocated appropriately, are leased and are not sold;
- (iii) Identify future provisions for electric vehicle charging points and disabled persons parking should a review identify that additional provision is required; and
- (iv) Detail how the 112 parking spaces allocated for commercial use shall be removed when they are no longer required or commercial lease agreements expire.

Thereafter the development shall be implemented and retained/maintained in accordance with these details, prior to occupation of the relevant phase, for as long as the development remains in existence.

#### REASON

To allow sufficient space for all vehicles to access the application site and neighbouring sites, and to safeguard the safety of highway users, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 (2020) and Policies T4 and T6 of the London Plan (2021).

### **51. NONSC Pre-Occupation - Fire Statement**

#### Pre-Occupation - Fire Statement

Prior to the first occupation of the development, or each development phase, the final comprehensive Fire Statement for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority (in consultation with the Health and Safety Executive - Planning Gateway One and the London Fire Brigade). This

should be accompanied by the Building Control Decision Notice or equivalent.

Thereafter the development shall be implemented and retained/maintained in accordance with these details, prior to occupation of the relevant phase, for as long as the development remains in existence.

#### REASON

To ensure the safety of all building users in accordance with Policy D12 of the London Plan (2021).

### **52. NONSC Pre-Occupation - Secured by Design**

#### Pre-Occupation - Secured by Design

Prior to the first occupation of the development, or each development phase, evidence that 'Secured by Design' accreditation (awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO)) has been achieved for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority.

#### REASON

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in excising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 to ensure the development provides a safe and secure environment in accordance with Policy DMHB 15 of the Hillingdon Local Plan: Part 2 (2020) and Policy D11 of the London Plan (2021).

### **53. NONSC Pre-Occupation - Low Emission Strategy**

#### Pre-Occupation - Low Emission Strategy

Prior to the first occupation of the development, or each development phase, a Low Emission Strategy (LES) for the development, or development phase, shall be submitted to and approved in writing by the Local Planning Authority. The LES shall detail but be not restricted to:

i) a clear and effective strategy to encourage users of the development to:-

- a) use public transport;
- b) cycle / walk to work where practicable;
- c) enter car share schemes;
- d) purchase and drive to work zero emission vehicles.

ii) Install EV fast charging points to promote the use of zero emission vehicles to serve the residential area.

Thereafter the development shall be implemented and retained/maintained in accordance with these details, prior to occupation of the relevant phase, for as long as the development remains in existence.

#### REASON

As the application site is within an Air Quality Management Area and Air Quality Focus Area, and to reduce the impact on air quality in accordance with Policy EM8 of the Local Plan: Part 1 (2012), Policy DMEI 14 of the Hillingdon Local Plan: Part 2 (2020), Policies SI 1 and T4 of the London Plan (2021) and the National Planning Policy Framework (2024).

#### **54. NONSC Pre-Occupation - Estate Management and Maintenance Plan**

##### Pre-Occupation - Estate Management and Maintenance Plan

Prior to the first occupation of the development, or each development phase, an Estate Management and Maintenance Plan for the development, or relevant phase, setting out maintenance and management responsibilities for all communal play spaces, public realm, communal amenity spaces and all publicly accessible open spaces to be delivered, shall be submitted to and approved in writing by the Local Planning Authority.

Thereafter the development shall be implemented and retained/maintained in accordance with these details, prior to occupation of the relevant phase, for as long as the development remains in existence.

#### REASON

To ensure the management and maintenance of the new housing development enhances the quality of the area in accordance with Policy DMBH 11 of the Hillingdon Local Plan: Part 2 (2020).

### Informatives

#### **1. I52 Compulsory Informative (1)**

The decision to GRANT Outline planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

#### **2. I70 LBH worked applicant in a positive & proactive (Granting)**

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from Local Plan Part

1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

### **3. 172 Section 106 Agreement**

You are advised that this permission has been granted subject to a legal agreement under Section 106 of the Town and Country Planning Act 1990.

### **4. 173 Community Infrastructure Levy (CIL) (Granting Consent)**

Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), this development is liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This will be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012. Before commencement of works the development parties must notify the London Borough of Hillingdon of the commencement date for the construction works (by submitting a Commencement Notice) and assume liability to pay CIL (by submitting an Assumption of Liability Notice) to the Council at [planning@hillingdon.gov.uk](mailto:planning@hillingdon.gov.uk). The Council will then issue a Demand Notice setting out the date and the amount of CIL that is payable. Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed.

The above forms can be found on the planning portal at:  
[www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil](http://www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil)

Pre-Commencement Conditions: These conditions are important from a CIL liability perspective as a scheme will not become CIL liable until all of the pre-commencement conditions have been discharged/complied with.

### **5.**

#### **Cadent Gas Informative**

Cadent Gas Ltd own and operate the gas infrastructure within the area of your development. There may be a legal interest (easements and other rights) in the land that restrict activity in proximity to Cadent assets in private land. The applicant must ensure that the proposed works do not infringe on legal rights of access and or restrictive covenants that exist.

If buildings or structures are proposed directly above the apparatus the development may only take place following diversion of the apparatus. The applicant should apply online to have apparatus diverted in advance of any works, by visiting [cadentgas.com/our-services/gas-diversions](http://cadentgas.com/our-services/gas-diversions) Prior to carrying out works, including the construction of access points, please register on [www.linesearchbeforeudig.co.uk](http://www.linesearchbeforeudig.co.uk) to submit details of the planned

works for review, ensuring requirements are adhered to.

## 6.

### Thames Water Informative

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing [trade.effluent@thameswater.co.uk](mailto:trade.effluent@thameswater.co.uk) . Application forms should be completed on line via [www.thameswater.co.uk](http://www.thameswater.co.uk). Please refer to the Wholesale; Business customers; Groundwater discharges section.

## 7.

### Network Rail Informative

#### GROUND LEVELS

The developers should be made aware that Network Rail needs to be consulted on any alterations to ground levels. No excavations should be carried out near railway embankments, retaining walls or bridges.

#### NOISE

Network Rail would remind the council and the applicant of the potential for any noise/ vibration impacts caused by the proximity between the proposed development and the existing railway, which must be assessed in the context of the National Planning Policy Framework (NPPF) and the local planning authority should use conditions as necessary.

The current level of railway usage may be subject to change at any time without prior notification including increased frequency of trains, night time train running and heavy freight trains.

There is also the potential for maintenance works to be carried out on trains, which is undertaken at night and means leaving the trains' motors running which can lead to increased levels of noise.

We therefore strongly recommend that all future residents are informed of the noise and vibration emanating from the railway, and of potential future increases in railway noise and vibration.

#### LIGHTING

Any lighting associated with the development (including vehicle lights) must not interfere with the sighting of signalling apparatus and/or train drivers vision on approaching trains. The location and colour of lights must not give rise to the potential for confusion with the signalling arrangements on the railway.

## 8.

### Heathrow Airport Informative

#### Bird Hazard Management Plan

The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting, roosting or loafing must be dispersed by the owner/occupier when detected or when requested by Heathrow Airside Operations staff. In some instances, it may be necessary to contact Heathrow Airside Operations staff before bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof. The breeding season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Natural England before the removal of nests and eggs

#### Cranes

Due to the site being within 6km of Heathrow Airport the crane operator is required to submit all crane details such as maximum height, operating radius, name, and phone number of site manager along with installation and dismantling dates to the CAA Airspace Coordination and Obstacle Management Service (ACOMS) system.

For notification, please follow the link via CAA website: Crane notification | Civil Aviation Authority ([caa.co.uk](http://caa.co.uk)) Once crane notification has been received from the CAA, Heathrow Works Approval Team will assess and issue the necessary crane permit. No cranes should operate on site until a crane permit has been issued.

Specific CAA guidance for crane lighting/markings is given in CAP1096: Guidance to crane users on the crane notification process and obstacle lighting and marking ([caa.co.uk](http://caa.co.uk))

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of Heathrow Airport Ltd, or not to attach conditions which Heathrow Airport Ltd has advised, it shall notify Heathrow Airport Ltd, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

## 9.

### Equality Act 2010 Informative

The Equality Act 2010 seeks to protect people accessing goods, facilities and services from discrimination on the basis of a 'protected characteristic', which includes those with a disability. As part of the Act, service providers are obliged to improve access to and within the structure of their building, particularly in situations where reasonable adjustment can be incorporated with relative ease. The Act states that service providers should think ahead to take steps to address barriers that impede disabled people.

## 10. 115 Control of Environmental Nuisance from Construction Work

### Control of Environmental Nuisance from Construction Work Informative

Nuisance from demolition and construction works is subject to control under The Control of Pollution Act 1974, the Clean Air Acts and other related legislation. In particular, you should ensure that the following are complied with:-

A. Demolition and construction works which are audible at the site boundary shall only be carried out between the hours of 08.00 and 18.00 hours Monday to Friday and between the hours of 08.00 hours and 13.00 hours on Saturday. No works shall be carried out on Sundays, Bank or Public Holidays.

B. All noise generated during such works shall be controlled in compliance with British Standard Code of Practice BS 5228:2009.

C. Dust emissions shall be controlled in compliance with the Mayor of London's Best Practice Guidance 'The Control of dust and emissions from construction and demolition.

D. No bonfires that create dark smoke or nuisance to local residents.

You are advised to consult the Council's Environmental Protection Unit ([www.hillingdon.gov.uk/noise](http://www.hillingdon.gov.uk/noise) Tel. 01895 250155) or to seek prior approval under Section 61 of the Control of Pollution Act if you anticipate any difficulty in carrying out construction other than within the normal working hours set out in (A) above, and by means that would minimise disturbance to adjoining premises.

## 11.

### Fit-Out Informative

#### Category A Fit-Out

Category A fit-out is defined as the basic level of interior finishing to make a space functional but not yet tailored for occupation. Category A includes (but is not limited to):

- Raised access floors and suspended ceilings
- Basic lighting and power distribution
- Mechanical and electrical services
- Fire detection and alarm systems
- Painted walls and basic finishes
- Finished communal areas (reception, lifts, lobbies)

#### Category A+ Fit-Out

Category A+ fit-out is defined as including all Category A features but also including some functional and design features, making the space ready for immediate occupation with minimal tenant input. Category A+ includes (but is not limited to):

- All Category A features
- Fitted kitchens and toilets
- Partitioned meeting rooms and breakout spaces
- Installed furniture and workstations
- IT infrastructure and air conditioning
- Enhanced finishes and lighting

#### Category B Fit-Out

Category B fit-out is defined as the full customisation and interior fit-out of the space to meet the tenant's specific requirements. Category B includes (but is not limited to):

- Partitioning (offices, meeting rooms, breakout areas)
- Bespoke furniture and joinery
- IT and AV installation
- Specialist lighting and decor
- Branding and signage
- Kitchen and tea points
- All finishes, flooring, and decorations

#### Interpretation:

For avoidance of doubt, these fit-out definitions are applicable to all of the proposed uses, which includes Classes E(a) retail, E(b) food and drink, E(e) medical or health services, E(f) nursery, E(g)(i) offices, F.2(a) shop with essential goods, F.2(b) hall or meeting place for local community. Reference should also be made to the British Council's 'Guide to Fit Out' 2025 publication.

### 153 Compulsory Informative (2)

The decision to GRANT Outline planning permission has been taken having regard to the

policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan (2021) and national guidance.

DMAV 1	Safe Operation of Airports
DMCI 4	Open Spaces in New Development
DMCI 5	Childrens Play Area
DMCI 7	Planning Obligations and Community Infrastructure Levy
DME 2	Employment Uses Outside of Designated Sites
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 7	Biodiversity Protection and Enhancement
DMEI 9	Management of Flood Risk
DMH 2	Housing Mix
DMH 7	Provision of Affordable Housing
DMHB 1	Heritage Assets
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMHB 19	Play Space
DMHB 2	Listed Buildings
DMHB 3	Locally Listed Buildings
DMHB 4	Conservation Areas
DMT 1	Managing Transport Impacts
DMT 2	Highways Impacts
DMT 3	Road Safeguarding
DMT 4	Public Transport
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking

LPP D1	(2021) London's form, character and capacity for growth
LPP D11	(2021) Safety, security and resilience to emergency
LPP D12	(2021) Fire safety
LPP D13	(2021) Agent of change
LPP D14	(2021) Noise
LPP D3	(2021) Optimising site capacity through the design-led approach
LPP D4	(2021) Delivering good design
LPP D5	(2021) Inclusive design
LPP D6	(2021) Housing quality and standards
LPP D7	(2021) Accessible housing
LPP D8	(2021) Public realm
LPP D9	(2021) Tall buildings
LPP DF1	(2021) Delivery of the Plan and Planning Obligations
LPP E11	(2021) Skills and opportunities for all
LPP E2	(2021) Providing suitable business space
LPP E3	(2021) Affordable workspace
LPP E4	(2021) Land for industry, logistics and services to support London's economic function
LPP E7	(2021) Industrial intensification, co-location and substitution
LPP E9	(2021) Retail, markets and hot food takeaways
LPP G1	(2021) Green infrastructure
LPP G4	(2021) Open space
LPP G5	(2021) Urban greening
LPP G6	(2021) Biodiversity and access to nature
LPP G7	(2021) Trees and woodlands
LPP GG1	(2021) Building strong and inclusive communities
LPP GG2	(2021) Making the best use of land
LPP GG3	(2021) Creating a healthy city
LPP GG4	(2021) Delivering the homes Londoners needs
LPP GG5	(2021) Growing a good economy
LPP GG6	(2021) Increasing efficiency and resilience
LPP H1	(2021) Increasing housing supply
LPP H10	(2021) Housing size mix
LPP H4	(2021) Delivering affordable housing
LPP H5	(2021) Threshold approach to applications
LPP H6	(2021) Affordable housing tenure

LPP H7	(2021) Monitoring of affordable housing
LPP HC1	(2021) Heritage conservation and growth
LPP S4	(2021) Play and informal recreation
LPP SD6	(2021) Town centres and high streets
LPP SD7	(2021) Town centres: development principles and Development Plan Documents
LPP SD8	(2021) Town centre network
LPP SD9	(2021) Town centres: Local partnerships and implementation
LPP SI1	(2021) Improving air quality
LPP SI12	(2021) Flood risk management
LPP SI13	(2021) Sustainable drainage
LPP SI2	(2021) Minimising greenhouse gas emissions
LPP SI3	(2021) Energy infrastructure
LPP SI4	(2021) Managing heat risk
LPP T1	(2021) Strategic approach to transport
LPP T2	(2021) Healthy Streets
LPP T3	(2021) Transport capacity, connectivity and safeguarding
LPP T4	(2021) Assessing and mitigating transport impacts
LPP T5	(2021) Cycling
LPP T6	(2021) Car parking
LPP T6.1	(2021) Residential parking
LPP T6.2	(2021) Office parking
LPP T6.5	(2021) Non-residential disabled persons parking
LPP T7	(2021) Deliveries, servicing and construction
LPP T8	(2021) Aviation
LPP T9	(2021) Funding transport infrastructure through planning
NPPF11 -24	NPPF11 2024 - Making effective use of land
NPPF12 -24	NPPF12 2024 - Achieving well-designed places
NPPF14 -24	NPPF14 2024 - Meeting the challenge of climate change, flood and coastal change
NPPF15 -24	NPPF15 2024 - Conserving and enhancing the natural environment
NPPF16 -24	NPPF16 2024 - Conserving and enhancing the historic environment
NPPF2 -24	NPPF2 2024 - Achieving sustainable development
NPPF4 -24	NPPF4 2024 - Decision making
NPPF5 -24	NPPF5 2024 - Delivering a sufficient supply of homes
NPPF6 -24	NPPF6 2024 - Building a strong, competitive economy
NPPF7 -24	NPPF7 2024 - Ensuring the vitality of town centres

NPPF8 -24      NPPF8 2024 - Promoting healthy and safe communities  
NPPF9 -24      NPPF9 2024 - Promoting sustainable transport

## Appendix 2: Relevant Planning History

40652/87/1562 Safeway House, 6 Millington Road Hayes

Redevelopment of site for business use

**Decision:** 16-12-1987 Approved

45753/APP/2012/2029 Hph 5 Millington Road Hayes

Erection of five storey building to provide 13,880sq.m of Class B1(a) Office floorspace, provision of car parking spaces at surface and basement level, associated landscaping and ancillary works.

**Decision:** 29-11-2012 Approved

67351/APP/2024/2746 Building Hph1 Hyde Park Hayes

Change of use from offices (Use Class E) to residential (Use Class C3) to create 75no. self-contained flats under Schedule 2, Part 3, Class MA of the Town and Country Planning (General Permitted Development) (England) Order 2015 (as amended)

**Decision:** 11-04-2025 Approved

76655/APP/2021/3039 Hph4 Millington Road Hayes

Re-development of the vacant Site to provide a residential development comprising 131 (C3) residential units, with associated amenity areas, landscaping, car parking and all ancillary and enabling works.

**Decision:** 19-01-2022 Approved

76655/APP/2023/779 Hph4 Millington Road Hayes

Variation of Condition 2 (Accordance with Approved Plans) of planning permission ref. 76655/APP/2021/3039 dated 07-04-2022 (Re-development of the vacant Site to provide a residential development comprising 131 (C3) residential units, with associated amenity areas, landscaping, car parking and all ancillary and enabling works) to alter the internal layouts and replace 13 no. studio units with 13 no. one-bedroom units.

**Decision:** 26-06-2023 Approved

76655/APP/2024/1152 Hph4 Millington Road Hayes

Variation of Condition 2 (Accordance with Approved Plans) of planning permission ref. 76655/APP/2023/779 dated 26-06-2023 (Variation of Condition 2 (Accordance with Approved Plans) of planning permission ref. 76655/APP/2021/3039 dated 07-04-2022 (Re-development of the vacant Site to provide a residential development comprising 131 (C3)

residential units, with associated amenity areas, landscaping, car parking and all ancillary and enabling works) to alter the internal layouts and replace 13 no. studio units with 13 no. one-bedroom units), in order to make the following amendments:

- Addition of a new external access route to a 2nd core (Core B) on 8th floor so that the 4no. top floor flats have access to a second stair core and escape lift;
- Insertion of a further escape lift to the southern stair core in Block A from ground to 7th floors; and
- Reconfiguration of flats due to internal structural wall changes.

**Decision:** 04-10-2024      Approved

### **Appendix 3: List of Relevant Planning Policies**

The following Local Plan Policies are considered relevant to the application:-

#### Part 1 Policies:

PT1.BE1	(2012) Built Environment
PT1.E1	(2012) Managing the Supply of Employment Land
PT1.EM1	(2012) Climate Change Adaptation and Mitigation
PT1.EM11	(2012) Sustainable Waste Management
PT1.EM4	(2012) Open Space and Informal Recreation
PT1.EM6	(2012) Flood Risk Management
PT1.EM7	(2012) Biodiversity and Geological Conservation
PT1.EM8	(2012) Land, Water, Air and Noise
PT1.H1	(2012) Housing Growth
PT1.H2	(2012) Affordable Housing
PT1.HE1	(2012) Heritage

#### Part 2 Policies:

DMAV 1	Safe Operation of Airports
DMCI 4	Open Spaces in New Development
DMCI 5	Childrens Play Area
DMCI 7	Planning Obligations and Community Infrastructure Levy
DME 2	Employment Uses Outside of Designated Sites
DMEI 1	Living Walls and Roofs and Onsite Vegetation
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NPPF8 -24	NPPF8 2024 - Promoting healthy and safe communities
NPPF9 -24	NPPF9 2024 - Promoting sustainable transport