

Former Nestle Factory, Hayes – Ref: 1331/APP/2017/1883

Conservation & Design Advice – Schedule One

Barratt London & SEGRO Design Team Response

No.	LBH Comment	Nestle Team Response/Observation
Policy Background		
1.	With regards to conservation areas, under section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990, it is the Council’s duty to pay special attention to the desirability of preserving or enhancing the character or appearance of that area in respect to any buildings or other land in the conservation area. Under the National Planning Policy Framework (NPPF) Conservation Areas are considered to be designated heritage assets.	We note that Historic England (letter dated 19 June 2017) consider that the application proposals take various steps to enhance the character of the conservation area and that these “ <i>efforts to preserve or enhance the character of the Conservation Area should help support this application with reference to Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and Paragraphs 131 and 137 of the National Planning Policy Framework (NPPF, March 2012)</i> ”.
Heritage Assets Heritage Statement		
2.	The factory building is described in the Heritage Report as an ‘early example of Truscon method of construction which was applied to a fairly innovative layout incorporating open light wells and courtyards for healthy environment with natural light.’ The contention is that the proposals will better reveal the original Truscon concrete frame. The Truscon building will be all but demolished - the frame, the layout, all of one facade and most of two of the others.	The analysis at paras 4.23 and 4.63 of the Heritage Statement refers to the retention of key elements of the most significant parts of the existing building which overall will maintain and through the removal of later accretions and sensitive refurbishment will sustain and enhance its industrial character or appearance.
3.	Para 135 of the NPPF says that a balance must be struck between the scale of loss and the significance of the asset. This balance is not considered in regard to the factory (substantial loss and considerable interest). The HS only applies Para 135 to the lodge (4.85) and not to the factory.	In the Heritage Statement, reference is made to the significance of the main factory building being sustained in accordance with the objectives of para 135 of the Framework. The Lodge building is then considered specifically as the proposals involve total demolition of this building. This impact is then considered further as part of the overall effect on the significance, in terms of character and appearance, of the conservation area as a whole.

4.	<p>'Proposals will restore its historic use character'. (Of the factory) The Segro building will not have an industrial use. The flats won't either.</p>	<p>Paragraphs 4.30 and 4.31 should be read in full and in context where it is noted that the application proposals will restore an element of the historic use character.</p> <p>The planning application proposals seek to provide B1c/B2/B8 uses, which are consistent with the historic use character and function of the site and the emerging site specific policy allocation. Noting that such uses have otherwise ceased and as a result caused significant harm to the character of the conservation area – reactivation of part of the site with such activity will be of benefit to use character.</p>
5.	<p>3.24 Importance of the 'Factory in a garden' concept mentioned several times, noting sad erosion of parts of the garden historically and underlining the garden's contribution to the special interest of the Conservation Area. However, the garden will be reduced in area by the building of Block G.</p>	<p>There will be some reduction in the extent of the present landscaped area in order to create an enclosed space which in design terms strengthens focus on the retained entrance of the factory building.</p> <p>In addition to its trees and greenery, the character of the garden is in the most part defined by its relationship to the Truscon Building, the axial route leading to it, and the Canteen with its attractive colonnade bounding it. These features are at the heart of the description - 'Factory in a Garden'. The southern edge to Nestles Avenue is defined by greenery and the original railings and gates which are of great value as they afford a public view of these features. The eastern edge, whilst partially screened by trees, is defined by a low quality chain link fence, at its boundary looking through to the car park. Development on the car park will naturally create a 4th edge, and complete the bounding of the garden in a more successful way than currently exists. The proposal to create a residential eastern edge serves the following purposes. It:</p> <ul style="list-style-type: none"> - completes the garden - creates a buffer to Segro Unit 1 - creates healthy natural surveillance of a public space <p>The following metrics show that the effect on the existing garden is minimal:. These refer to dMFK drawings SK101 and SK102</p>

1. The width of the existing garden from the Canteen to the existing boundary fence to the car park is 110m. The new width will be 105m, a reduction of less than 5%.
2. The perception of the garden width as perceived from Nestles Avenue is narrowed by the existing squash court, which obscures public view through the railings of the Canteen Colonnade, and the western side of the garden. The removal of the squash court will increase the viewable width from Nestles Avenue from 91m to 95m, an increase of 5%.
3. Whilst the setting of the garden will be altered, it is important to put this change into context. The garden will be broadly the same width as existing, slightly larger in area, and more visible from Nestles Avenue. Further, the introduction of public access is a significant benefit from the existing and historic position, and the blend of uses (cafe, workspace, nursery, gym, and homes) surrounding it will enliven it, survey it, and can be seen as a strong net enhancement and public benefit to the Conservation Area. Please refer to drawing dMFK_SK_101. The existing Wallis gardens area is 12750sqm. Elsewhere, by removal of the squash court, the setting back of the building element to the east of the Truscon Tower, and the freeing of public space around the proposed Block H and the Canteen, increases in Garden area will be made. The proposed garden will be 12870 sqm, an increase of 100sqm.
4. Of a total of 85 trees, no category A trees will be affected, 2 Category B trees are removed, and 7 CAT C trees. And a number of CAT U trees. Replacement trees will be planted.

The essence of the historic character of the Site as a 'Factory in a Garden' concept will be sustained by the proposals, including the relationship between the retained locally listed buildings and this open space but with an enhanced landscaping scheme. We note and urge that officers take account of Historic England's

		<p>statutory consultee response¹ on this matter where it is concluded that retention of “much of the Factory Garden landscaping” is one of the several steps taken by the application proposals to enhance the character and appearance of the conservation area.</p>
6.	<p>4.34 The existing gardens will be maintained and enhanced. No they will not as they will be reduced in area by the building of Block G, and trees will be lost</p>	<p>See comments in relation to point 5 above.</p>
7.	<p>4.42 New wing to the south will enclose the existing garden. In fact proposals reduce existing garden by about half a hectare, with loss of trees.</p>	<p>An analysis of the open space has been undertaken by dMFK (see response to comment 5 above).</p> <p>The proposals are broadly consistent with the objectives of the draft OAPF masterplan and are supported by the GLA at the pre-app stage to assist with the wider-place making and urban design objectives.</p>
8.	<p>4.40 ‘Tower on canteen will improve relationship with factory. The factory was built as the dominant building, the canteen as the supporting structure. The historical grouping should be retained and the original differences in status respected.</p>	<p>This paragraph should be read in context and note that the term ‘tower’ is not used (noting also that this element is in fact composed at 6 storeys and is not considered to be a ‘tower’. Importantly, this element of the proposals has been designed to resolve the presently poor resolved interface between these elements and to better maintain the overall spatial relationship between the locally listed buildings drawing upon the support of GLA officers in support of the place-making role of the scheme in helping to define/enclose Wallis Gardens.</p> <p>This building will create a gentle vertical emphasis on the proposed east west route to the station which is an important masterplanning move. It will mark the position of the Canteen, and it should be noted that it replaces an unsightly single storey toilet block. The new smaller footprint creates a space between the building and the Canteen, creating new public space around a proposed café, and views of the Canteen not previously possible to enjoy.</p>

¹ Ibid

<p>9.</p>	<p>4.10 Historic England says scheme' creatively re-uses the other retained facades for residential development behind, to overall benefit to the Conservation Area. This is contrary to Historic England: Conservation Principles 2015, para 146.</p> <p><i>“There are limits, however, beyond which loss of inherited fabric compromises the authenticity and integrity of a place. At the extreme, a proposal to retain no more than the façade of an historic building attached to a modern structure must be considered in the light of an assessment of the existing values of the building, both as a whole and in its elements. The relationship between the façade and the existing and proposed structures behind will be crucial to the decision, but retaining the façade alone will not normally be acceptable”.</i></p>	<p>We acknowledge that Historic England has previously published generic advice on such matters but urge that officers take full account of their response to statutory consultation on these specific application proposals – in effect where they are commenting on the specifics of the case.</p> <p>Historic England’s position is based on an overall judgement of the impact of the proposals having regard to the particular and relative significance of the locally listed building and its contribution to significance of the conservation area and the public benefits derived from the scheme. Notably, Historic England comment²:</p> <p><i>“Various steps are being taken to enhance the character of the Botwell: Nestles Hayes Conservation Area, as informed by a greater level of analysis, and this is strongly welcomed. In particular we are pleased to see the retention of the canteen building, the significant parts of the boundary railings, much of the Factory Garden landscaping, the revealing of the canal-side setting, the reimagining of the Sandow Building and the retention of much of the Truscon Building facades. These efforts to preserve and enhance the character of the Conservation Area should help to support the application with reference to Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and Paragraphs 131 and 137 of the National Planning Policy Framework (NPPF, March 2012).”</i></p> <p>When considered in light of primary legislative duty and national planning policy objectives, Historic England consider than in the circumstances of this case that retention of the factory building facades is acceptable.</p>
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² Ibid

10.	4.46 The high quality contextual development is considered to be of an appropriate height and scale, and an enhancement to the CA However, the new development is quite different in height, scale, design and materials, often jarring and very monotonous.	<p>The design quality of the new development is fully set out in the Design and Access Statement and has been evolved in extensive pre-application discussions. Further amendments to the scheme design are also proposed following consultation with officers.</p> <p>It should also be noted that no concerns have been expressed in this regard by either GLA or Historic England.</p>
11.	4.55 The heritage significance of the conservation area and its key component buildings will be conserved and enhanced by the proposals. Strongly contested.	<p>We respect that the conservation officers don't share this view. However, we contend that upon objective assessment of the nature and extent of heritage significance as found today, taking account of functional obsolescence and cessation of what was a critically important use character, that the application proposals provide a measured and appropriate response in preserving and enhancing those elements of the conservation area which together form that significance.</p> <p>We draw support for that judgement and conclusions from the formal comments of both Historic England and the GLA.</p>
12.	<p>NPPF Para 132. Great weight should be given to the asset's conservation. Significance will be harmed by the alteration and destruction of the heritage asset and by the development within its setting. Clear and convincing justification should be provided for:</p> <ol style="list-style-type: none"> 1. Loss of the factory. Why can this not be converted to residential? 2. Loss of integrity of factory by replacing element to east of tower and attaching it to new wing. 3. Loss of gardens, and thereby setting of factory, by building Block G. 4. Loss of integrity of canteen by building tower and removing loggia. 	<p>The following responses are made to each point:</p> <ol style="list-style-type: none"> 1. dMFK submitted a detailed design study to LBH (June 2016 – enclosed with this submission) showing how a residential conversion could re use the building. Such a scheme creates: <ul style="list-style-type: none"> ○ unworkably deep, oversized residential units ○ a large quantity of residential units, generating a significant parking requirement which can only be accommodated at ground floor level, within the building. A parking proposal for such a scheme would need to cover the entire ground floor of the building, would not meet current standards for car movements owing to the narrow column spacings, and would need to also spread into the courtyard areas,

<p>5. Scale, design and materials of buildings surrounding factory.</p> <p>NPPF Para 133 Substantial harm to a designated heritage asset, must be justified against substantial public benefits. These should be specified. Also, a justification as to why the factory cannot be converted, as was initially proposed.</p>	<p>eroding landscape quality of these areas.</p> <ul style="list-style-type: none"> ○ Large residential units would require amenity space which, if provided by inset balconies (as proposed by LBH within their tabled residential proposal), would significantly erode the visual quality of the building by losing existing windows at regular intervals. <ol style="list-style-type: none"> 2. The existing element to the east of the factory does not significantly contribute to its quality. The main feature of this corner is the unusual way that the east and south facades meet, and are celebrated by the later introduction of the 1960's Art Deco style entrance which, whilst designed to have an axial feel, sits unusually on the corner of the existing factory. This relationship is maintained by the significant setting back, and setting down of the new element. 3. Covered under (5) above. 4. The introduction of Block H, which is not a tower, enhances the setting of the Canteen, creates space around it, exposes views not previously seen, and re contextualises the building within a new east west emphasis across the site. The existing loggia is not removed. It is retained and renovated, and will create a shelter and shade to a new proposed café, and gym. 5. The overall masterplan concept is the interlock between employment and residential uses, and between old and new built fabric. The vision for the residential masterplan is to create a characterful and excellent place to live, with a strong and positive identity, in direct response to the unique character of the site and its context. What makes this development distinctive is the scale of its spaces and the robust character of its built
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		<p>fabric, both new and old, in response to the former industrial nature of the site. The creation of a street pattern which grows out of the factory layout and fits naturally into the context of Nestles Avenue will give an order and coherence to the site, on a generous scale, in keeping with the scale and character of the factory.</p> <p>The site has a strong dominant geometry, set both by the factory buildings and the line of Harold Avenue. The masterplan has achieved a balance between that geometry as a unifying element, and softening it with subtle inflections; to add an element of surprise and delight, and introduce an intermediary scale within the spatial structure as a whole.</p> <p>The massing of the residential buildings within the masterplan is composed as a diverse but unified group; rising to mid height around Sandow Square, reduced in response to the heritage setting of the canteen and main factory front, and maximised along the North edge in the form of four 'feature blocks', fanning out from the orthogonal of the factory to the diagonal of the railway. The skyline is carved and broken up across the project, with multiple breaks at core locations and cutaway terraces; introducing intermediary scale and creating visual accents.</p> <p>At the forefront of the design process has been the intent to create open amenity space for both the residents of the scheme and the general public who have access to the area. The areas of public space and communal garden space that can be enjoyed on site add up to 46,627 m2.</p> <p>The site is a collage of many materials, with diverse elements of architecture, landscape and engineering. In a similar way, the proposed buildings and landscape are a 'collage' of elements; new and old, large and</p>
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		<p>small, tough and delicate, regular and irregular, hard and soft. The material palette, including the residential and industrial components of the project, and the landscape, has been developed under the inspiration of the existing factory site and its context. This has been carefully coordinated as part of the masterplan process, whilst promoting diversity and avoiding homogeneity. The predominant materials of brick, metal, rendered concrete and glass are found across the site in a wide variety of applications. Echoes and reflections of the old fabric are found in the new, both in terms of the materiality and the proportions.</p> <p>After 2 rounds of discussion with LBH, the following changes were made to Blocks H and G:</p> <ul style="list-style-type: none"> ○ A storey was removed from Block G ○ The materials have been changed to a white brick, combined with Vert de Gris decorative panels to tie in with the Canteen and darker brick feature panels on Block G. <p>In response to the ‘harm’ of the proposals on the Conservation Area, Turley, the applicants’ heritage adviser has produced a separate note on the perception of substantial harm and consequential consideration of national planning policy</p>
Townscape/Design		
13.	Loss of main factory building (other than part of its facade), Sandow’s building and lodge not accepted, subject to comments above and in next section.	It is essential to point out that the parts of the façade retained are by far the most significant in terms of their effect on the Conservation Area. They are the key public facing facades. Within those facades, non-original windows are being replaced with more appropriately designed windows, and the finish of the walls will be restored. The elements of the building behind, that are being re constructed, offer minimal significant benefit to the Conservation Area, and by virtue of residential conversion, would be hidden within fire rated and sound proof internal lining.

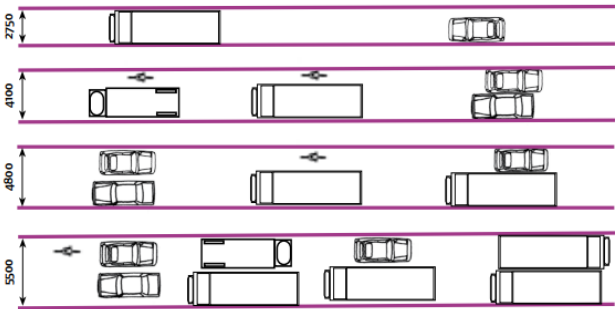
		<p>Sadow. A design study, which was included in the Design and Access Statement, demonstrates the extent to which the original Sadow façade has been lost. Over 80% of its façade has been lost, and only a small fragment now remains. Internally, the building is not Listed, and it's depth of 25m (as demonstrated in the dMFK factory reuse document submitted during consultation does not suit residential conversion. In Conservation Area terms, the existing interior does not offer significant public benefit when set against the negative results of conversion with regard to the building depth.</p>
14.	<p>The townscape study clearly illustrates the impact of the proposed development on long, medium and local views. What is evident from this is the scale of the new development, its massing and height, which rises quite abruptly to 11 storeys behind the Nestles Avenue frontage. It will create a wall of development that will dominate the local sky line when viewed from the existing residential area to the immediate south of the site. There appear to be no views from within the site, particularly angled views from Wallis Gardens.</p>	<p>The heights of the residential blocks rise from G+3 stories on Nestles Avenue to G+10 stories along the railway. This is both to reflect the need for an appropriate level of density, as dictated by the site's increasingly good transport connections once Crossrail is complete, and to respond to the substantial scale of the existing factory buildings which are so essential to the character of the Conservation Area.</p> <p>The massing of the residential buildings within the masterplan is composed as a diverse but unified group; rising to mid height around Sadow Square, reduced in response to the heritage setting of the canteen and main factory front, and maximised along the North edge in the form of four 'feature blocks', fanning out from the orthogonal of the factory to the diagonal of the railway. The skyline is carved and broken up across the project, with multiple breaks at core locations and cutaway terraces; introducing intermediary scale and creating visual accents.</p>
15.	<p>The new development would be of a scale and massing that would dominate the original buildings and the immediately surrounding area, and detract from the established character of the conservation area. The fact that all of the site falls within a conservation area, not just Wallis Gardens and the original factory buildings, seems to have been totally missed in this development.</p>	<p>The 'established character of the CA' is extremely varied and does not compromise just the locally listed buildings. It also contains a range of industrial buildings of varying scale, character and materiality as well as extensive hardstandings. There is presumably no expectation that these elements/characteristics will be maintained or utilised to inform the design of the emerging proposals.</p>

16.	<p>The skyline and form of the development mean that the tower of the main factory building, an important local landmark, will no longer be the most prominent structure within the conservation area.</p>	<p>In important views from within and outside of the conservation area, the main factory building will remain a legible landmark structure, where this contributes positively to its heritage significance, most notably from Wallis Gardens and Nestle Avenue. The views from the canal and railway will change; however, this part of the Site has been extensively compromised and is not the best means to appreciate heritage significance of the LLB or CA.</p> <p>Views of the tower are currently seen from:</p> <ul style="list-style-type: none"> - The gardens - The axial route from Nestles Avenue - Eastern and western views <p>From elsewhere in the site, the tower is not visible, and is not the most prominent structure within the Conservation Area. The most prominent structures within the site are generally the unattractive accretions that have built up over time around the main Truscon building. The other main prominent features of the Conservation Area is the sheer scale of the long West, South and East elevations of the Truscon, which are all being preserved and enhanced as part of these proposals.</p>
17.	<p>Building G does not relate to the original buildings in terms of design or materials. Historically, the main factory building (other than the original Sandow's building) was developed over time, but the structure, design approach and materials were consistent for each stage of development, resulting in a coherent appearance across all of the phases of development- so that it appeared as one building.</p>	<p>The design of Block G has now evolved materially in discussion with LBH and in terms of design as described under 12 above, and shown on drawings DM-2-03-P2 and DM-6-05-P1.</p>
18.	<p>The new "Sandow's" building is not a replica of the original - even the signage is incorrect. It's an approximation that fits the proposed residential development, there is no heritage gain in this proposal. The grey clad</p>	<p>There is some validity to the phrasing associated with the rebuilding of Sandow. The brickwork frame appears authentic but it is adapted to fit contemporary residential needs. Presumably, similar alterations would be required even if the existing façade were to be retained and made good/rebuilt in part. This does</p>

	<p>“additional” floors are overly tall and would create an unbalance facade.</p>	<p>not necessarily make the approach harmful in heritage terms. Perhaps, explore whether there is scope to introduce further authentic details i.e. signage.</p> <p>The design of the re constructed Sandow façade has been evolved in discussion with LBH, as shown on drawings DM-2-00-P2 and DM-6-01. The height of the roof extension is appropriate and has not been amended. The following has changes have been made:</p> <ul style="list-style-type: none"> - The elevation has been carefully re designed to more accurately reflect the original design, re introducing the original asymmetry. - The parapet has been altered to connect with the Truscon in a more gentle way. - The materials of the roof extension have been changed to metal shingles to give the extensions a shimmering quality. - The new parapet has been given a perforated quality. - The suggestion that ‘the signage is incorrect’, is a difficult criticism to address since, as a commercial building, and as evidenced through the series of historic photographs shown within the design and access statement, the signage was constantly being changed. There are examples of signwritten signage, saying both ‘Sandow’ and ‘Nestle’, but also other signage indicating products made within. It would seem contrived to re introduce such signage, but the naming of the building ‘Sandow’ would seem an appropriate point to celebrate. We have indicated new metal signage, in the spirit of the built up lettering applied to the building in the mid 20th century, and have applied this to the parapet.
19.	<p>The open space in front the main factory, which is at the heart of the conservation area, will be reduced in size, as proposed block G will be constructed on part of this area.</p>	<p>See above – Comment 17.</p>

20.	Blocks C and D need to be set back in line with the southern elevation of the canteen to preserve the existing green space along Nestles Avenue.	<p>Blocks C and D are set back in line with the restrictive covenant under title MX348720 (No buildings in the factory or Warehouse Class (B2 or B8) within 50ft (15.25m) of Nestles Avenue. This has been previously coordinate with LBH so these blocks align with future developments at Squirrels Estate and Buccleuch. The latter are to be at 15.25m from Nestles Avenue.</p> <p>In heritage terms, the former canteen of is a sufficiently robust architectural character that it will not be affected by the proposed relationship to Blocks C and D. It was, historically, located in an industrial context with contrasts in scale and materiality, Will not undermine appreciation of the heritage significance, best understood from opposite on Nestles Avenue, as part of the group with the main factory building and Wallis Garden.</p>
21.	The design of the new residential blocks does not reflect the character/architectural style of the very distinctive white concrete elevations and flat roofs of the Truscon buildings- these are the “hallmarks” of this conservation area. The proposed traditional industrial saw tooth roofs, therefore, have no place in this conservation area.	In both scale and form there is a gradual transition across the site from Nestles Avenue to the northern edge of the site, adjacent to the railway line, where industrial references become more prevalent in the building design and facade expression. Above the mid-rise eight-storey blocks the tallest building, Block E1, expresses a marked difference to the framed and stock brick elements, using a light red brick arranged in a series of double height layers separated by bands of grey brick. A four-bay gabled roof profile with contrast brick detailing caps the building with a single storey ‘crown’ and hints at the industrial typology of trans-shipment wharfs, reflecting the adjacent crossing point of the Grand Union Canal and the Great Western Main Line.
22.	The materials proposed for the new blocks are a mixture of different bricks and cladding, some of it very dark in colour. Overall, the new buildings would appear dark and oppressive, which would be contrary to the spirit of the simply detailed Deco style buildings that characterise the conservation area.	The site is a collage of many materials, with diverse elements of architecture, landscape and engineering. In a similar way the proposed buildings and landscape are a 'collage' of elements; new and old, large and small, tough and delicate, regular and irregular, hard and soft. The material palette, including the residential and industrial components of the project, and the landscape, has been developed under the inspiration of the existing factory site and its context. This has been carefully coordinated as part of the masterplan process, whilst promoting diversity and avoiding

		<p>homogeneity. The predominant materials of brick, metal, rendered concrete and glass are found across the site in a wide variety of applications. Echoes and reflections of the old fabric are found in the new, both in terms of the materiality and the proportions. We have reviewed some materials as shown on the attached drawings.</p>
23.	<p>The balconies on the new blocks appear overly large and some of the detailing rather fussy</p>	<p>There are deliberate commonalities shared between all balconies throughout the development, but in the interests of diversity there is a degree of change between the different building types. As a counterpoint to the solidity of masonry walls which wrap the scheme, a filigree layer of balconies is used, both to give a strong indoor-outdoor animation to the facades, and to enrich the facades with a delicate layer of metalwork which will create dramatically changing patterns of shadow and light as the sun moves through the day.</p> <p>The balconies across the scheme have some unifying characteristics, such as the strong horizontal datum set up by the primary steel frame, but there are also many differences, from space to space and from building to building. In terms of detail, a balance is achieved between solid and void, and between privacy and openness, using solid and perforate metal panels, vertical metal rails and clear glass, to create 'variations on a theme' which respond to the particular conditions of the different parts of the project. Soffit structures are also exposed in places and panelled in others to distinguish further between the various frontages.</p> <p>Most of the balconies are compliant with the minimum requirements (i.e. 0Bed 5m², 1Bed 5m², 2bed 6m² and 3bed 7m²); they only exceed in areas when identifying corner accents (i.e. These markers are used in relation to arrival on Canal St, and views from the Station; in direct response to the angles of the masterplan).</p> <p>All balconies are sized to mayoral minimum standards. Laser cut detailing has been added to large balconies and feature balconies to create variation in the façade without the addition of another material which would add to the complexity.</p>

24.	Many of the blocks would have highly visible angled PVs at roof level, which would be prominent in longer views. These should be retained within the new roof forms to give a clean roofline.	Parapet height to all gridded blocks has been updated and is now shown at 1100mm high; this ensures that PV panels cannot be seen.
25.	There are concerns re the number of flats off corridors, up to 12 in some cases. Many have only 1 shared staircase, as such, in the light of recent events, there are significant concerns re means of escape in an emergency. The deck access flats may also have a similar problem. Block G seems to have 2 cores, however, some of the potential travel distances to a staircase in case of an emergency appear overly long.	<p>Block B: All staircases at Blocks B1, B2, B3, B4, B5, B8 and B9 serves 8 units per floor which is compliant. Block B6 has some levels where the staircase serves 9 units and all levels of B7 have 9 units that are served by 1 staircases. This should be acceptable as the excess by 1 unit in this instance is generated by replacing 3bed by studios and 2 bed.</p> <p>The majority of blocks have 8 units per core. Where blocks have more, the fire consultant has taken distance and size of escape into account in their analysis and report.</p>
26.	A single vehicle access point for the whole residential site looks insufficient given the size of the development and the likely number of vehicles movements, what happens if for some reason this gateway is blocked.	The residential component of the development does not have a single access point. There are two vehicular accesses onto Nestle Avenue, Canal Street and Milk Street. Milk Street forms a new junction with Nestles Avenue, whilst Canal Street enters the site at an existing access that has been disused for some time but would be re-opened. Emergency vehicle access would also be available via Wallis Walk, if ever required.
27.	The roads generally look quite narrow, and there seem to be few turning heads. The disabled parking bays also need to be located close to the entrances to each of the housing blocks.	<p>Milk Street and Canal Street are 6m wide. Sandow Walk, which is much more lightly trafficked, is narrower at 4.8m in places. The Manual for Streets provides the following guidance on what carriageway widths can accommodate. It can be seen that even Sandow Walk is wide enough to accommodate an HGV and car passing each other, whilst Canal Street and Milk Street are wide enough for two HGVs to pass each other.</p>  <p>Figure 7.1 illustrates what various carriageway widths can accommodate. They are not necessarily recommendations.</p>

28.	There are spaces at the back of Block G at the rear of the residential site that appear to be inaccessible. There is also an odd space to the rear of the tower foyer area and Block G and between the canteen building and new block adjacent H.	<p>The area to the rear of Block G is for maintenance access only and will not be accessible to residents or members of the public. There is also a fence between Block G and Unit 1 to provide security for the industrial part of the development.</p> <p>There is landscaped space between the canteen and Block H that will allow circulation around the building and provide distinction between the proposed Block H and Canteen building.</p>
29.	Concerns re the loss of the loggia to the canteen and that it is not reinstated to its full extent.	The loggia is preserved in its entirety with a single bay addition to create shelter around Block H.
30.	Block is H is too tall when seen in conjunction with the retained canteen block.	Covered under Point 8 above.
31.	Only Unit 4 of the Segro site makes any attempt at reflecting the character of the original factory buildings, the others are very ordinary industrial sheds with barrel roof forms, which do not reflect the architectural style of any of the existing buildings.	Response to follow.
32.	Unit 1 needs a better detailed elevation onto Nestle Avenue, a green wall? The northern elevation of unit 3 needs to look more like unit 1 and relate better to the original factory design. All of the units should have green roofs.	Response to follow.
33.	The Segro site could have shared office and visitor parking in a multi- storey structure, as per the Vinyl Factory site, so freeing up the land adjacent to the canal.	Response to follow.

34.	The end use of the buildings on the Segro site should be agreed. Having “flexible units” could mean that in the future applications may be submitted for additions or changes to the size and external appearance of the units that may be detrimental to the appearance of the conservation area. If the units are to be used for data storage, then this should be made clear at this stage and the site design amended accordingly, this may free up space within the loading bay areas etc. for landscaping.	Response to follow.
Site Interpretation		
35	The site has a rich industrial history this would need to be interpreted and displayed on site. This could be achieved through display panels and also the display of items associated with the history of the site. Links with the Nestles archives need to be forged/maintained. An area devoted to the history of the site could be created at ground floor in the original tower and made accessible.	<p>The scheme proposals seek to celebrate the rich industrial history of the site and a public art strategy is being developed that utilises items of interest as part of the public art provision. SEGRO and Barratt London has employed the services of Steve Rawlinson, an ex-employee of Nestle, who has gathered a wealth of information about the history of the site and also facilitated a site visit to view the historic pieces inside the buildings. Segro and Barratt London will be examining an itinerary of the key items and will engage designers and artists to advise on which elements of the factory machinery would be of most interest to be retained and the best locations for them in the context of the old and new buildings and public realm.</p> <p>In principle, the applicants support the idea to provide display panels, display of items, links to the Nestle archive and display in the entrance tower (see response to 36 below). It is assumed that LBH would seek delivery of this by securing by planning condition.</p>
36.	The war memorial needs to be returned to the site to its original position in the foyer area.	The war memorial is currently in safe storage and is intended to be restored in the tower entrance foyer of the main factory building.

Structural Survey Report

37.	Generally no indication buildings are completely structurally unsound, requiring the need for demolition, see previous comments on justification. Requires further investigations and analysis on existing buildings to ensure structural alterations are carefully considered and sympathetic. Concerns over how demolition will be phased and managed given separate reports and different approaches suggested.	Further information submitted with revised demolition information pack.
38.	The Lodge <ul style="list-style-type: none">• No significant structural issues	Noted
39.	Canteen Building - would need full repairs schedule and methodology of repairs/re-builds for this building to make it structurally safe for future use <ul style="list-style-type: none">• Generally well founded apart from colonnade element• Chloride ion content of concrete exceeds 0.4% which could lead to chloride induced corrosion - would need to know how they intend on addressing this issue, realkalisation repair• Colonnade and shower rooms proposed to be demolished• Emphasis of colonnade and views through to the main factory building would be lost, which can be seen in site photos submitted (no.5). Should continue to Sandow Walk.	Noted

40.	<p>Sadow Building</p> <ul style="list-style-type: none"> • Interesting masonry jack arch floor construction • Generally well founded, reasonable good condition, robust original construction • Floor capacities likely to support residential and commercial office conversion • Survey recommends local patch repairs 	Noted
41.	<p>Truscon Building and Foyer extension</p> <ul style="list-style-type: none"> • Truscon (Kahn) RC system used in building (not Hennebique system) • Building originally designed to accommodate additional floors • Generally well founded • Floor capacities likely to support residential and commercial office conversion • Foyer extension and west, east and southern Truscon façades to be retained • Ties proposed to be used to restrain facade off new build structure - details? 	We note that breaking out showed a reinforcement similar to the Hennebique system of reinforcement, not Kahn. We believe the planners may expect it to be Kahn because this is what was typically used by the Truscon company.
Demolition Report		
42.	<ul style="list-style-type: none"> • Two reports written by different consultants for the one building. • The demolition of the main factory building treated separately by different organisations/ construction programme. The demolition processes of one part of the building will impact other parts. (Segro can't demolish without Barratt having façade supports in place and vice versa) 	Further information submitted with revised demolition information pack.

	<ul style="list-style-type: none">• Sandow's building entirely demolished (reasonably good condition)• Colonnade to Canteen building to be demolished according to text separating structure entirely from main building, drawing within report indicates it will be replaced in facsimile.• Existing fenestration to retained Truscon facade to be removed and replaced• Discrepancies between demolition drawings, A50 and F_A55 regarding retention of full southern facade of main factory building• Elliot Wood document does not refer to Locally Listed gates and railings• Capita document 'assumes' stability of building structure• Lodge entirely demolished• Gates and Railings to remain• Segro demolition line goes beyond site boundary line and does not accord with residential demolition proposal• Proposed temporary cross bracing would be within proposed demolished section of Barratt owned part of building (outside site boundary). Capita reference to retained building in correct as Barratt are not proposing to retain the building (in part)• Would need to ensure construction plans for both parties are consistent in regards to the main factory building• Masterplan demolition plan (drawing no. MP 041) shows facade retention for Sandow's	
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	<p>building - this requires confirmation</p> <ul style="list-style-type: none">• Unclear how facade will be supported in regards to Barratt scheme, and a section along the east facade without a building to the rear	
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