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& Partners

Planning. Design. Economics.

The Old Vinyl Factory

Planning Statement

Purplexed LLP (Joint Venture between
Cathedral Group & Development Securities)

26 July 2012

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1.0

Introduction

- 1.1 Purplexed LLP (a joint venture between the Cathedral Group and Development Securities) acquired the former EMI complex (hereafter known as The Old Vinyl Factory 'TOVF') at Blyth Road in Hayes in order to secure its re-invigoration as a mixed use employment, commercial and residential neighbourhood in Hayes, drawing on and celebrating the area's history and built heritage.
- 1.2 Whilst previous planning permissions have been granted to secure redevelopment, the inability to attract long term tenants in view of the relatively 'bland' approach to design and image has led to these being partly implemented and not pursued.
- 1.3 This difficulty in securing tenants for the main office buildings continues. Purplexed's initiative is designed to reverse this position by creating a vibrant and interesting local environment – and to secure substantial and stable long term employment rather than short term lets.
- 1.4 On 27 March 2012, detailed planning permission was granted for the first phase of this exciting development. The 'Gatefold Building' comprises the development of 132 apartments, a café/community space, 5 workshop units together with associated landscaping, access and play space. The purpose of this scheme is to provide the catalyst for the regeneration of the wider Old Vinyl Factory site. Confirming the high quality design approach at the site, the Gatefold Building was awarded a 2012 project winner at the Housing Design Awards and construction of this first phase will commence at the end of this year.
- 1.5 This outline planning application seeks approval for the redevelopment of the remainder of the site (excluding the Cabinet Building, Shipping Building and Record Store, for which conversion and refurbishment have already been approved). The overall objective is to secure some 4,000 new jobs across the site including the Cabinet Building, Shipping Building and Record Store as part of a new mixed use community, whilst also reusing the locally listed buildings and enhancing the conservation area so that the site becomes a thriving hub of employment and activity, as it once was at the height of EMI's presence at the site.

The Planning Statement

- 1.6 This Statement has been prepared by Nathaniel Lichfield & Partners on behalf of Purplexed LLP to accompany an application for outline planning permission at land to the west of Blyth Road in respect of a development to be known as The Old Vinyl Factory (TOVF) and incorporating:

“Outline planning application for a mixed use development of the Old Vinyl Factory site, including the demolition of up to 12,643 sqm of buildings and construction of up to 112,953 sqm (112,953 sqm includes the retention and re-use of 784 sqm of the Power House and 901 sqm of Pressing Plant) of new floorspace. Uses to include up to 510 residential units (maximum area of 49,000 sqm GEA), up to 7,886 sqm of new B1 floorspace, up to 4,000 sqm of A class uses (A1, A2, A3, A4, A5), up to 4,700 sqm of D1 and D2 uses, an energy centre (up to 950 sqm), car parking with up to 1,640 spaces, works to access and creation of new accesses and landscaping”

1.7 Two further applications have been made in parallel:

- 1 An application for conservation area consent for demolition and partial demolition of approximately 12,448 sqm (GEA) buildings within the conservation area; and,
- 2 An outline application for 3,219 sqm (GEA) of B1 floorspace to comprise: new ‘cabinets’ with interlinking lightweight canopies on the roof of the existing Cabinet Building, a new entrance canopy at ground level and a new external escape stair.

1.8 When including the proposed works to the Cabinet Building, the overall masterplan will comprise the construction of up to 115,953 sqm (115,953 sqm includes the retention and re-use of 784 sqm of the Power House and 901 sqm of Pressing Plant) of new floorspace. This incorporates up to 10,886 sqm of new B1 floorspace.

1.9 The applications have been made separately for administrative purposes but the impacts of the proposed works have been assessed in totality and as a package of works that comprise the masterplan for TOVF site.

1.10 The purpose of this document is to set out the nature of the proposal and how it relates to the Statutory Development Plan and other material considerations. This Planning Statement should be read in conjunction with the following documents which form the planning application:

- a Design and Access Statement;
- b Planning application drawings, namely, a set of Parameter Plans;
- c Environmental Statement;
- d Illustrative Drawings;
- e Office Space Demand Report
- f Viability Appraisal Report;
- g Statement of Community Engagement;
- h Sustainability Statement; and
- i Energy Statement.

1.11 The Environmental Statement (including non-technical summary, main studies and appendices) assesses the likely effects arising during both the

construction and operational phases of the proposed development and comprises:

Chapter 1: Introduction;

Chapter 2: Scheme Description;

Chapter 3: EIA Methodology;

Chapter 4: Consideration of Alternatives;

Chapter 5: Demolition and Construction;

Chapter 6: Socio-economic Effects;

Chapter 7: Townscape and Visual;

Chapter 8: Built Heritage and Archaeology;

Chapter 9: Traffic and Transport;

Chapter 10: Noise and Vibration;

Chapter 11: Air Quality;

Chapter 12: Contamination and Ground Conditions;

Chapter 13: Daylight and Sunlight;

Chapter 14: Cumulative Effects; and

Chapter 15: Summary of Mitigation and Residual Effects.

Report Structure

1.12

This Planning Statement comprises the following chapters:

Chapter 2 – Background and context including a description of the site and surrounding area and information on the planning history;

Chapter 3 – Summary of the consultation undertaken prior to submission;

Chapter 4 – Details on the proposed development;

Chapter 5 – A summary of the policy context;

Chapter 6 – An appraisal of the main policy issues relating to the proposal;

Chapter 7 – Concluding comments.

2.0

Background and Context

Application Site and Surrounding Area

- 2.1 The application site (The Old Vinyl Factory site) at Blyth Road is located approximately 260 metres to the south west of Hayes Town Centre within the London Borough of Hillingdon and has an area of circa 6.6 hectares (see drawing 0001). The site is predominantly vacant; existing uses include:
- Vacant B1 light industrial and office uses (Cabinet Building, Record Store and Jubilee Building);
 - Refurbished office space, and associated support services in the part occupied Shipping Building (formerly known as Mercury House);
 - The former Apollo House (now known as Pressing Plant) which includes some light industrial and warehouse uses;
 - Surface car parking to the west of the site.
- 2.2 The site includes a number of industrial and commercial buildings which are historically associated with the music industry. The site itself was formerly used by EMI as a global manufacturing base for vinyl record production.
- 2.3 The south west of the site is occupied by The Shipping Building (formerly known as Mercury House) which has been refurbished and partially let, The Cabinet Building (formerly known as Vulcan House) and The Record Store (formerly known as Phoenix House), which are both semi derelict, offices still requiring extensive refurbishment.
- 2.4 The new Vinyl Lounge is located to the north west of the site and adjacent to the substantial car parking area which is entirely hard standing apart from some integrated landscaping.
- 2.5 To the eastern part of the site there are three existing buildings: Jubilee House, The Powerhouse (formerly Neptune House) and The Printing Press (formerly Apollo House). Jubilee House is a 3-storey 1930's building which is currently vacant. The Powerhouse is a 2-storey brick boiler house built in 1906 which is also vacant. The Printing Press is a 2-storey brick building with a warehouse extension to the east. This warehouse (outside the current application site) is currently occupied by Vinyl Factory Manufactory Ltd for the production of vinyl records.
- 2.6 The eastern half of the application site and the buildings along the northern half of Blyth Road are within the Botwell: Thorn/EMI Conservation Area. It includes only locally listed buildings and, to the north east – outside of the application site - the Grade II listed Enterprise House. Further details in connection with the conservation area designation and the locally listed buildings is set out within the Heritage Impact Assessment (see ES volume 2, appendix 8).

- 2.7 The total existing floor area on the site is approximately 56,345 sqm with approximately 550 parking spaces on site.
- 2.8 **Surrounding the site**
- 2.9 The site is bounded to the south by the mainline Paddington-Reading railway and beyond this are the gardens of residential properties along Keith Road. To the north the site is bounded by Blyth Road which provides two vehicular access points to the site at its western end. Beyond Blyth Road are residential dwellings to the north east of the site and industrial buildings to the north.
- 2.10 The eastern boundary of the site adjoins Apollo House (to be called The Printing Press) which has recently received planning permission for residential and ancillary uses (Gatefold Building) and represents Phase 2 of The Old Vinyl Factory development. Beyond this and towards the station is vacant business/industrial land. An application for the redevelopment of part of this vacant land (20-30 Blyth Road) to provide a part 11 storey, part 9 storey, part 5 storey and part 4 storey building comprising 123 residential units, flexible business floorspace, 95 car parking spaces, hard and soft landscaping and revised access arrangements has been submitted to the London Borough of Hillingdon and is awaiting determination (Council Ref: 1425/APP/2011/3040). To the west, the site is bounded by Dawley Road and a single row of semi-detached and terraced houses.
- 2.11 The Hayes and Harlington railway station is located approximately 300 metres from the nearest boundary or 600m from the centre of the site and provides east-west connections between Paddington and Reading (and beyond) and Heathrow Connect services to the airport. The role of the Hayes and Harlington station is set to increase in the future as it becomes one of the stations on the Crossrail route across central London (in 2018).
- 2.12 Please refer to the Design and Access Statement for a full and extensive context analysis of the site and surrounding area.

Planning History

- 2.13 The Old Vinyl Factory site was a major focus for employment in Hayes from 1907 and was originally developed by The Gramophone and Typewriter Company. It quickly became the largest employer in the town and a world-renowned centre for music production. At the height of its operations, in the 1960s, 14,000 people were employed at The Old Vinyl Factory site; now only 500 are employed by another business at the site. Today, TOVF is predominantly vacant and many of the heritage buildings in an increasingly poor state of repair.
- 2.14 Since early 2000 there have been a number of planning applications at the site which have sought to attract employers to the site. The planning applications of most relevance to this latest submission are identified below.

2000 Applications

- 2.15 Full planning permission was granted on 12 April 2001 for
- i alterations to the parking layout and landscaping within the site;
 - ii formation of three access/egress points to Blyth Road; and,
 - iii extinguishment of the existing public footpath across the site (plus installation of CCTV and lighting (involving selective demolition of buildings) (Ref.51588/APP/2000/1418).
- 2.16 Full planning permission was also granted at the same time for alterations to the external appearance and extensions to Vulcan House, Mercury House and Phoenix House (Ref. 51588/APP/2000/1827).
- 2.17 The plans approved in April 2001 show the following works:
- 1 Bridge access on floors 1-5 from Record to Cabinet;
 - 2 Alternations to the reception and atrium space in Cabinet;
 - 3 Extension to the south of Cabinet;
 - 4 Roof top works: including removal of Water Tower at the roof level of Cabinet and removal of roof level rooms;
 - 5 Localised roof top extensions to Record, Shipping and Cabinet Buildings;
 - 6 Minor extensions/works to Record and Shipping;
 - 7 External alterations to the appearance of Cabinet, Shipping and Record Store (including new windows, entrances etc); and,
 - 8 Internal alterations of Cabinet, including works to the two atrium spaces with the creation of a new reception, with the building being served by 8 lifts.
- 2.18 Both consents have been implemented, through the creation of 550 parking spaces and the refurbishment of the Shipping Building.

Mixed Use Redevelopment (2006)

- 2.19 In September 2006, applications for full planning permission and conservation area consent [Council Refs: 59872/APP/2006/ 2790 and 2791] were submitted for development on the former EMI Factory site in its entirety for a mix of uses to provide:
- a new creative quarter including a new public square, music visitors centre, recording and broadcasting studios, rehearsal and post production rooms, gallery/event area, digital warehousing and distribution and vinyl production with associated retail, bar/café area and leisure facilities;
 - b Erection of 358 residential units and 58 live/work units with part ground floor employment uses; and
 - c associated parking, servicing and landscaping (involving demolition of Neptune, Apollo extension and two ancillary Jubilee buildings).

- 2.20 At the time of writing the applications remain live, albeit we understand that the Council is not intending to make a decision on the proposals.

Mixed Use Redevelopment ‘extant scheme’ (2007)

- 2.21 In January 2009, planning consent was granted [Council Ref: 59872/APP/2007/3060] for the following development in the eastern part of The Old Vinyl Factory site, including the area covered by the more recent The Gatefold Building planning consent:
- “Change of use of, and external alterations to Apollo and Jubilee to provide a new creative quarter comprising vinyl production, studios, visitors centre, training, office and exhibition space with associated café/bar, retail and leisure facilities (Use Classes A1, A3, A4, A5, B1, B2, D1 & D2).*
- Change of use and external alterations to Neptune House for mixed use (Use Classes A3, A4, A5, B1, D1 & D2).*
- New build residential development of 244 units with associated ground floor uses A1, A3, A4, A5, B1, D1 & D2)*
- and associated access, parking, servicing and landscaping (involving part demolition of Neptune, Apollo and Jubilee buildings).”*
- 2.22 This planning permission was subject to a section 106 legal agreement but has not been implemented. A planning application for the extension of time period in which to implement that planning permission 59872/APP/2007/3060 has been submitted to the London Borough of Hillingdon on behalf of the site owner, Purplexed LLP. This application remains undetermined [Council Ref: 59872/APP/2011/1691].

Change of use of Neptune House (2008)

- 2.23 On the 18 March 2008, planning permission was granted for external alterations and change of use of Neptune House
- from Class B1 (Business)
 - to a mixed of uses including B1 (Business), A3 (Restaurants and Cafes), A4 (Drinking establishments), A5 (Hot food takeaways), D1 (Non-residential institutions) and D2 (Assembly and leisure) (Ref. 31917/APP/2007/3789).
- 2.24 The consent was not implemented and has now expired.

The Gatefold Building (2012)

- 2.25 On the 27 March 2012 planning permission was granted, subject to a s106 agreement, for the Gatefold Building (Council ref: 51588/APP/2011/2253). This development, located to the east of the site, forms the second phase of The Old Vinyl Factory redevelopment and comprises:
- 132 apartments;
 - Café/community room (aprox 200 sqm GEA);

- 5 workshop units (279 sqm GEA);
- Enclosed parking (107 spaces); and
- Access and landscaping improvements (including a children's play area).

2.26 The s106 agreement includes the requirement to provide 14 affordable homes on site, convert the marketing suite to four incubator start-up units and undertake £800,000 of improvements to the Shipping Building. Additional financial contributions are also required towards construction training, air quality, community facilities, education, health, library services and public realm enhancements.

2.27 It is expected that the planning permission will be implemented towards the end of 2012.

Summary

2.28 The planning history for the site shows that there has been a number of planning consents for the redevelopment of the site and individual buildings. Some of these consents have been implemented in part but the consented schemes have not been attractive to the market and thus have not been delivered in full.

3.0

Pre-application Consultation

3.1

The planning application has been prepared following consultation with a number of stakeholders including officers and Members at the London Borough of Hillingdon, officers at the Greater London Authority, TfL, English Heritage, CABE (and other statutory consultees) and members of the public. Public exhibitions were held on 22, 23 and 24 March 2012. A summary of the pre-application process is set out below and addresses the comments made on the principle of development. More details are also set out within the accompanying Statement of Community Engagement.

London Borough of Hillingdon

Officers

3.2

A number of meetings have been held with officers through the evolution of the scheme. These have included meetings with the planning, conservation, design, transport, access and environmental teams. Regular weekly meetings have been held with officers throughout April to July 2012.

3.3

Instead of summarising the feedback of every meeting, we list below the key issues which have been raised by LBH and a schedule of the meetings held is attached at Appendix 1:

- a Sufficient information within the outline planning application will be required to allow full consideration of the proposal which is adjacent to a Grade II Listed Building and within a Conservation Area and includes locally listed buildings;
- b Detailed parameters will be required to address the use, amount, layout and scale and how the proposals link to phasing and demolition. Additional details are also needed on access and landscaping;
- c Parameter plans, a landscaping masterplan and illustrative drawings are required;
- d There needs to be 'absolute clarity' in regard to existing, consented and proposed floorspace broken down by building;
- e The importance of the employment space coming forward has been stressed and there should be a guarantee of this space coming forward;
- f The cinema and retail space will need to be assessed given its out/edge of town centre location;
- g The housing mix will need to be clearly justified. The Council will accept the proposed mix as set out by the Mayor's Housing Draft SPG (2011);
- h Ensure there is a clear understanding of movement strategy including servicing and vehicular movements;
- i Ensuring the play facilities are located appropriately and can operate successfully without adverse impact upon residential amenity;

- j Acceptable visual impact of the site from the Dawley/Blyth Road roundabout is required;
- k Improved relationship with Dawley Road is necessary;
- l 12 Verifiable view points would need to be assessed as part of a Townscape and Visual impact study;
- m The height, bulk and massing of the car park stacks will need to be carefully designed;
- n Develop a rationale for the height of buildings in respect of urban form/design. The impact upon overshadowing and sunlight penetration needed to be explored;
- o Need for Blyth Road to be the primary walking route;
- p Proposed parking levels need to be fully justified. As a minimum 0.75 car parking spaces per residential unit will be required;
- q The roof form across the site to be further considered to produce a considered roofscape having regard for the setting and impact on the historic context;
- r The 21m rule between habitable rooms should be met. Where this is not met, users should be able to retreat to a room/space with privacy. The design and access statement should set out how any variations can be addressed with design solutions;
- s The materials and approach to The Groove and how this can cater for sight impediments;
- t The need to provide sample residential unit layouts showing typical wheelchair and lifetime homes standards;
- u The Blue Badge criteria is the benchmark used but given scale and complexity of scheme there could be some discretion with respect to Veneer Building; and,
- v How the site will integrate into the town centre and station will need to be shown in the access statement.

Members

- 3.4 A meeting was held with Members on 30 May 2012 to present the proposals prior to a planning application being submitted. The purpose of the meeting was to provide Members with an opportunity to consider the scheme and inform the design process. Members welcomed the regeneration of the site and made suggestions. As a result of the feedback from Members at that meeting two changes were made to the scheme:
- a The addition of extra 'pop-up' units on the Assembly Building, middle block providing an extra 10 units and an extra floor on the Veneer Building of approximately 10 units; and,
 - b Changing the Pressing Plant from a refurbishment to a new build on the rear part of the building, resulting in approximately 30-50 new residential

units whilst retaining the same quantum of commercial space on the ground and first floor.

- c Commercial floorspace within the new buildings will be 'affordable commercial' and let at 70% of open market value.

Greater London Authority

1st Meeting

- 3.5 On 14 February a meeting was held with officers at the Greater London Authority (GLA), Transport for London (TfL) and Design for London to introduce initial proposals for The Old Vinyl Factory. The scheme comprised approximately 600 residential units and 60,000 sqm of flexible commercial space, representing a 15,000 sqm uplift in employment space. The 600 residential units included the 132 which received a resolution to grant that evening by LBH.
- 3.6 On 29 February, a letter summarising the discussions which took place at the meeting was received. In summary, the principle of a mixed use development was acceptable in part subject to further information being received and that issues related to the design of a key route through the site was addressed.
- 3.7 In further detail the GLA wanted the project team to look at the following issues and address the following comments:
 - 1 A full breakdown of existing and proposed floorspace by use class so that net increases or decreases could be clearly identified;
 - 2 LBH is a limited release authority for employment floorspace and further evidence was required to be prepared by the Council to give an update to the evidence base for land release;
 - 3 Concern regarding the realistic viability of a number of the flexible employment/studio spaces proposed;
 - 4 Understanding of how the employment floorspace and residential uses will work together;
 - 5 Details of the level and mix of affordable housing proposed is required and a demonstration of how this meets local housing needs (addressing any departure from the London Plan requirement for a 60:40 split);
 - 6 A viability assessment will be required;
 - 7 Need to deliver a range of housing sizes and types and a justification for the mix and how it meets local demand and housing need;
 - 8 The proposal should have a residential density range of 200-700 habitable rooms per hectare;
 - 9 Considered the masterplan to be well thought out and maximised the potential of the site, creating a good mix of uses around a number of important buildings which create a simple and strong identity for the area;

- 10 Thought there was a need to minimise opportunities for criminal behaviour through maximising day and night activity and articulation of public and private spaces;
- 11 The alignment of the new route through the site ('The Groove') results in inactive uses around some buildings making the areas feel less safe;
- 12 The Groove should only be a secondary route for pedestrians and should not remove pedestrian activity from Blyth Road;
- 13 Strongly support the wrapping of buildings with active uses;
- 14 Need to consider how the site links towards the Railway Station;
- 15 Proposals of four to ten storeys is welcomed to create a distinctive piece of urban fabric which is easily identifiable;
- 16 Need further information on noise levels of the buildings perpendicular to the railway line;
- 17 Should investigate whether there are opportunities for district heat networks but the proposal to install a side wide heat network linking all building uses was welcomed – phasing detail will be required; and,
- 18 A commitment should be made to a single energy centre for combined heat and power.

2nd Meeting

- 3.8 A second pre-application meeting with the GLA was held on 29 May 2012 followed by a formal written response dated 22 June. The purpose of the meeting was to provide the GLA with an update on the project and emerging Masterplan.
- 3.9 The key changes since the last meeting were:
- 1 Alterations to the west of the site to create two separate multi storey car parks and a new mixed use building (The Veneer Building);
 - 2 Realignment of the Material Store improve view lines to the 'flat iron' end of the Record Store;
 - 3 The Shipping Building, Cabinet Building and Record Store are now omitted from the planning application boundary (but linked to the masterplan via legal agreement. The buildings will be renovated in accordance with the 2001 planning permission and any additional changes to the Cabinet Building will be dealt with by a separate application. The masterplan application will however continue to assess the full implications of the masterplan;
 - 4 Changes to the cinema layout to increase the width of The Groove between The Picture House and Assembly Building;
 - 5 Additional 'pop-up' units on the Assembly Building and Veneer Building and changes to the proposals at the Pressing Plant (southern section to be demolished and replaced by new mixed use building); and,
 - 6 Development of a strategy for heights across the site.

3.10

The main comments raised by the GLA are summarised as:

- 1 The residential uses within the SIL (west of site) are not in conformity with the London Plan;
- 2 Further evidence is required from the LPA regarding employment land release;
- 3 The release of the remaining employment land for other uses could be acceptable;
- 4 The innovative design approach is strongly supported but there needs to be a high level of architectural quality to ensure the masterplan relates to the surrounding streets and ensures the spaces between the building are of high quality;
- 5 Concern raised about high levels of parking and impact upon layout and overall quality of some areas of the scheme;
- 6 The parameter plans should show the maximum amount of frontage to be taken up by 'inactive' uses and if possible likely position of front entrances;
- 7 Narrow strip of active uses wrapped around parking provision is strongly supported;
- 8 Concerns raised about the two multi-storey and one surface car park within the western end of the site (it is considered that this will result in a poor quality environment and does not create a high quality 'entrance' from Dawley Road junction nor will it aid in achieving the full opportunity to uplift the environmental quality of Blyth Road);
- 9 The new Dawley Road access is supported but the design solution is not;
- 10 A number of publicly accessible spaces proposed lack active frontages, overlooking or pedestrian activity;
- 11 An indicative layout should be provided with the outline application to demonstrate that the Housing Design Guide standards can be met within the parameters of the development;
- 12 All ground floor units should be accessed directly from the street for all new buildings;
- 13 No more than 8 residential units should be accessed from any single core on each floor;
- 14 Single aspect units should be avoided. No north facing single aspect units will be accepted;
- 15 Building heights ranging from approximately 37 to 64 metres and thereby creating an interesting and varied skyline is supported;
- 16 The relationship between the multi storey car park and proposed residential block on Blyth Road needs to be reconsidered due to the 14 metre height and potential for over dominance;
- 17 The applicant should commit to a single 600 kilowatt CHP unit to be served by a site wide system with gas fired boilers to generate heat;

18 Parking levels for the offices exceed London Plan policies and should be reduced; and,

19 The proposed residential parking ratio is consistent with recently permitted schemes in the area and is therefore considered reasonable.

3.11 With respect to the principle of mixed uses at the site and the SIL designation the comments made by the GLA are addressed within section 6 below. The design response to the GLA comments, which includes further changes to The Veneer Shed is set out within the Design and Access Statement whilst the response to parking provision is set out within the Parking Management Framework (part of the Transport Assessment, ES appendix 9). The Sustainability/Energy Strategy is set out within the reports produced by MTT.

Summary

3.12 There has been a full and exhaustive dialogue with key stakeholders in the Borough. The comments from consultees have been instrumental in evolving the draft proposals into the final scheme that is presented as part of this outline planning application.

3.13 The Statement of Community Engagement sets out the feedback obtained at public consultation events and information is also set out within the ES.

3.14 A full analysis of how consultee comments related to design and access issues has evolved the scheme is set out within the Design and Access Statement.

4.0

Proposed Development

4.1

Three applications are submitted for the proposed development at TOVF:

- 1 Outline Application with some matters reserved for the proposed masterplan;
- 2 Conservation Area Consent Application for Demolition of Buildings; and
- 3 Outline Application with some matters reserved for works to the Cabinet Building.

4.2

These applications are described in more detail below.

1. Proposed Masterplan (Outline Application)

4.3

An outline planning application for TOVF masterplan with some matters reserved is hereby submitted for your determination. The reserved matters for which approval is being sought at this time are:

- Access;
- Layout; and,
- Scale.

4.4

Given the importance of the scheme and its location within a conservation area, we have agreed with the LBH to provide information on other matters at this time. This will serve to establish in principle some details related to landscape and appearance.

4.5

For the purposes of the planning application the following details have therefore been provided:

- 1 **Scale** – A series of parameter plans which set maximum and minimum building heights and lengths.
- 2 **Layout** – the way in which buildings, routes and open spaces are provided within the development and their relationship to buildings and spaces outside the development.
- 3 **Appearance** – the aspects of a building or place which determine the visual impression it makes, excluding the external built form of the development.

This includes a simplified design coding describing principles of external appearance for buildings of different types and more detail.
- 4 **Access** – this covers accessibility to and within the site for vehicles, cycles and pedestrians in terms of the positioning and treatment of access and circulation routes and how these fit into the surrounding access network.

This includes an access and servicing plan together with a brief report describing operational matters.

- 5 **Landscaping** – this shows the strategy for the treatment of private and public spaces to enhance or protect the site’s amenity through hard and soft measures

It includes the public realm parameter plan (with grass and tree areas shown) and a brief report on scale of intended planting and principles of ongoing maintenance

- 4.6 Detailed design and specification(s) are reserved for consideration at a later date via separate reserved matters applications.

The Parameter Plans

- 4.7 A series of parameter plans have been prepared. These cover the following details for approval:

- Plan 01: Planning Application Boundary (drawing P_0001);
- Plan 02: Existing Ground Levels (drawing P_0002);
- Plan 03: Existing Buildings to be Retained, Demolished or Altered (drawing P_0003);
- Plan 04: Proposed Minimum & Maximum Plot Extents & Heights (drawing P_0004);
- Plan 05: Lower Level Uses (drawing P_0005);
- Plan 06: Upper Level Uses (drawing P_0006);
- Plan 07: Proposed Ground Levels (drawing P_0007);
- Plan 08: Proposed Enclosed Car Park Extent at Ground Level (drawing P_0008);
- Plan 09: Proposed Enclosed Car Park Extent Above Ground Level (drawing P_0009);
- Plan 10: Proposed Critical Distances (drawing P_0010);
- Plan 11: Proposed Range of Building heights (drawing P_0011);
- Plan 12: Proposed Ground Level Landscape and Open Space Plan (drawing P_0012);
- Plan 13: Proposed Podium and Roof Landscape and Open Space Plan (drawing P_0013);
- Plan 14: Tree Removal Plan (drawing P_0014); and,
- Plan 15: Access Circulation & Streets (drawing P_0015)

Description of Proposed Masterplan

- 4.8 The outline planning application comprises a phased refurbishment and alterations to a number of existing buildings together with construction of new buildings. When including the proposed works to the Cabinet Building, the mixed use development will consist of the following:

- The demolition of up to 12,643 sqm of buildings (including the marketing suite) and construction of up to 115,953 sqm (115,953 sqm when including the retention and re-use of 784sqm of the Power House and 901sqm of Pressing Plant) of new floorspace (GEA);
- up to 510 residential units (maximum area of 49,000 sqm GEA);
- up to 10,886 sqm of new B1 floorspace;
- up to 4,000 sqm of A class uses including A1 (shops), A2 (financial and professional services), A3 (restaurants and cafes), A4 (drinking establishments) and A5 (hot food takeaways);
- up to 4,700 sqm of D1 (non-residential institutions) and D2 (Assembly and leisure) uses;
- an energy centre (up to 950 sqm);
- car parking with up to 1,640 spaces (including up to 51,500 sqm of car parking within enclosed buildings);
- works to access and creation of new accesses; and,
- landscaping.

Scheme content: the proposed buildings

4.9

The proposed development seeks to create a mixed use neighbourhood with a series of public spaces linked by a new public route, the Groove, which complements and runs parallel to Blyth Road. The Groove is to be located to the north of the Gatefold building and moves westwards through the site and onto Dawley Road. To the north and south of the Groove are active commercial and leisure uses set within individual building blocks that broadly range from 2 to 10 storeys. A series of individual new building plots comprise:

- 1 **The Machine Store** – located to the east of the site and adjacent to the approved Gatefold Building. The Machine Store comprises the former southern section of The Pressing Plant, which is to be demolished to create two storeys of B1 commercial floorspace, with residential accommodation above. Parking is located within an integral car park.
- 2 **The Pressing Plant** – approximately 901 sqm (GEA) of the northern section of the existing Pressing Plant building will be retained to create a museum to house the EMI collection, which will be open to the public and exhibit and explain the impressive history of this industrial site. The retention of the northern section of the building will ensure that the impressive locally listed façade is retained, whilst removing the southern sections which are of less architectural quality and in very poor condition. Between the Machine Store and the Pressing Plant is the beginning of The Groove.
- 3 To the west of the Pressing Plant is a new building; **The Boiler House**, defined to the north by Blyth Road and to the south by The Groove. The building will provide a mix of commercial and residential accommodation and has been limited in height to respect both the listed Enterprise

House (located on the opposite side of Blyth Road) and the Power House (to the west of The Boiler House).

- 4 **The Material Store** – to the south west of the Boiler House is a new perimeter block building which fronts onto The Groove and enclosed to the south by the railway line. The Material Store will be predominantly residential in use, but will be wrapped with commercial/residential uses at ground and first floor level. Parking is to be located within an integral car park.
- 5 To the west of the Material Store is a secondary route that feeds off The Groove and forms the eastern boundary for **The Assembly Building**. The footprint of the Assembly building has been carefully tapered at the southern corners to enhance views of the Record Store to its rear. The building will be predominantly residential in use, with three fingers of residential development running broadly south west to north east. As with the Material Store, below this will be two levels of integral car parking wrapped with commercial/residential uses at ground and first floor level.
- 6 To the southwest of the Assembly Building, the **Record Store** will be refurbished for B1 office use in accordance with the 2001 planning consent. The Record Store has therefore been excluded from the masterplan application boundary but the requirement to refurbish this space will be provided via s106 agreement.
- 7 Similarly the **Cabinet Building** (located to the north west of the Record Store) will also be refurbished for B1 office use in accordance with the 2001 planning consent. A separate outline planning application is also being submitted to add an additional floor of accommodation to the top of the Cabinet building, a new entrance canopy at ground level and a new escape staircase. This application is described in more detail below (see para 4.18).
- 8 The **Shipping Building** (located to the south west of the Record Store) has already been renovated in accordance with the 2001 planning permission and is part occupied. No further works are proposed to this building and marketing will continue to find occupiers for the remaining floorspace, relying in part on communal facilities added in the last year.

The Cabinet, Shipping Building, the Record Store will form a significant part of the B1 employment offer at the site, restored and refurbished to meet modern requirements.
- 9 The original **Power House** to the north of the Assembly Building will be retained and refurbished, whilst its lean-to additions will be demolished. The Power House will be used for the site's central Energy Centre and the remaining part will be refurbished to create a popular music venue and cafe. A pitched roof will also be added to the building.
- 10 **The Picture House** will be a new building to the north west of the Power House, defined to the north east by Blyth Road and to the south west by The Groove. The building is reduced in scale to respect the Power House and Enterprise House and will contain bars and restaurants, etc. at

ground floor level and a cinema at the upper floor. At ground floor level the building has two separate footprints, whilst at the upper level the two floorplates are linked by a new bridge. To the north west of the Picture House will be a new public square which fronts onto Blyth Road and The Cabinet Building.

- 11 **The Record Stack** - This new building is located to the north west of the Cabinet and Shipping Buildings and will provide parking for the commercial/business uses. The building will be cylindrical in plan form and the illustrative masterplan shows that it will be designed in the form of a stack of vinyl records. Between the Cabinet Building and the Record Stack, The Groove is diverted to the south west to Dawley Road.
- 12 To the north east of The Record Stack is a new building that is defined to the north by Blyth Road and to the east by the proposed new public space. The building, to be known as **The Veneer Building**, will contain predominantly A and B class uses at lower level, with residential uses above.
- 13 **Veneer Store** – this building will be located to the far west of the site, beyond the Record Stack and The Veneer Building. The Veneer Store will provide parking for the commercial/business uses and will be curved in form to the west, to enhance views from Dawley Road and to provide an improved relationship with the existing residential properties to the south west of the site. At ground level, to the north east of the building there will be commercial uses (A/B/D class uses) and animated frontages will be provided along the north eastern façade and south western façade.

Mix of Residential Units

4.10 The proposed development comprises the following mix of residential units:

- 204 x 1 bed flats (40%)
- 230 x 2 bed flats (45%)
- 51x 3 bed flats (10%)
- 25 x 4 bed flats (5%)
- Total 510 residential units

4.11 The proposed affordable housing mix will be subject to viability.

Public spaces

4.12 The Groove will be the key public route within the site; it links the east of the site from the Gatefold Building through to the west and on to Dawley Road. It is the key to permeability and accessibility within the site. From the Groove a series of lanes provide accessibility to secondary routes that link north to south.

4.13 In addition to the Groove, the proposed masterplan includes a series of public spaces as an integral and positive part of the site. The main square will be

between The Veneer Building and The Picture House and will be framed to the north east by Blyth Road and to the south west by the Cabinet Building. The square will be predominantly hard landscaping and will include a play area. Other squares will be provided around the Power House and to the north west of the Shipping building (also predominantly hard landscaping). Other secondary public spaces (referred to as Groves) will be provided between the Record Stack and the Cabinet Building, and between the Cabinet Building and Assembly Building. These Groves will be predominantly soft landscaping.

- 4.14 A play area will be provided between the Assembly Building and Material Store.

Illustrative Drawings

- 4.15 An illustrative scheme has been provided with the outline planning application. The purpose of which is to demonstrate that the parameters set out – and tested within the ES – can be accommodated on site creating an interesting and successful, high quality mixed use scheme. A detailed description of the illustrative masterplan is set out within the Design and Access Statement.

- 4.16 The following drawings have been submitted for illustrative purposes only:

- 1 Masterplan;
- 2 Selection of proposed sections across the site;
- 3 Colour contoured building heights drawing; and,
- 4 Sketches – contained within the Design and Access Statement.

2. Demolition of Buildings (Conservation Area Consent Application)

- 4.17 In order to facilitate the proposed masterplan, an application for conservation area consent for the demolition and partial demolition of approximately 12,643 sqm buildings within the conservation area is being submitted. The extent of the proposed demolition works are set out within parameter plan 03. In summary the southern section of The Pressing Plant and Jubilee House are to be demolished and the modern additions to The Power House will be removed. A detailed Heritage Impact Assessment accompanies the application.

3. Cabinet Building Application (Outline Application)

- 4.18 As identified above, the Cabinet Building will be refurbished in accordance with the 2001 planning permission. However, it is also proposed to increase the amount of B1 accommodation within the building through the provision of an additional storey of accommodation in the form of three Cabinets with lightweight interlinking canopies. The parameters for the additional accommodation are shown on drawing AHMM 11032-A-00-P03 and will provide for an additional 3,219 sqm of B1 floorspace. A new entrance canopy along part of the northern façade at ground level is also proposed as a means of opening up the building to the new public space in front.

- 4.19 For the purposes of the planning assessment, the full impacts of the proposed works to the Cabinet and Record Buildings have been assessed alongside the proposed demolition works and the outline masterplan application. Together, the three applications form the package of works that comprise the wider masterplan for TOVF site.

Phasing of the Masterplan

- 4.20 An indicative phasing plan for the masterplan is set out with in the Design and Access Statement it identifies the following:
- 1 Phase 1: Refurbishment of the Shipping Building (including new café and reception area);
 - 2 Phase 2: Implementation of the Gatefold planning permission (Council ref: 51588/APP/2011/2253);
 - 3 Phase 3: Construction of The Boiler House, The Power House, The Picture House and The Assembly Building and refurbishment of the Record Store;
 - 4 Phase 4: Construction of The Veneer Building and The Veneer Store;
 - 5 Phase 5: Construction of The Material Store, The Machine Store and The Pressing Plant; and,
 - 6 Phase 6: Refurbishment of The Cabinet Building and construction of The Record Stack.
- 4.21 The phasing as proposed secures the creation of available employment space, linked to the provision of residential development. This ensures that a mixed use development will be created at the site in a progressive and planned manner.
- 4.22 Phasing will be subject to ongoing review and may change due to demand. For example, if an end user for the Cabinet building was found earlier in the masterplan period, that part of the development can be progressed at an earlier stage. However, the masterplan will continue to focus on progressive job creation through mixed use development.

5.0

Policy Context

5.1

A full policy review has been undertaken as part of the preparation of this application and key policy considerations are identified at the end of this Chapter.

5.2

The analysis of how the proposal relates to the key policies is set out in Chapter 6.

Statutory Context

5.3

Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that planning applications are to be determined in accordance with the Statutory Development Plan unless material considerations indicate otherwise. At the present time, the Statutory Development Plan comprises:

- a The recent London Plan (Adopted 2011); and,
- b The earlier London Borough of Hillingdon Unitary Development Plan (Adopted 1998, as Saved 2007).

5.4

The Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990 provides specific protection for buildings and areas of special architectural or historic interest over and above the protection provided through the Town and Country Planning Act 1990.

5.5

The Act identifies that, in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority:

“shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.” (Section 66 (1))

5.6

With respect to conservation areas, Councils have a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of land or buildings within a conservation area (Section 72).

National Planning Policy Framework

5.7

The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England (published on 17 March 2012). It replaces all previously issued Planning Policy Statements (PPSs) and Planning Policy Guidance (PPGs) with a single national planning policy document. The NPPF must be taken into account in the preparation of local and neighbourhood plans, and is a material consideration in planning decisions.

5.8

Whilst existing national planning policy has been revoked and replaced, London-wide policy and the unitary development plan identified above remain active.

However, the NPPF states that due weight should be given to the relevant policies in existing plans adopted prior to 2004 (in this case the UDP was adopted in 1998) according to their degree of consistency with the NPPF. In the event of any conflict in policy with the NPPF and the UDP, the NPPF will take precedence.

- 5.9 The key principle of the NPPF is the presumption in favour of sustainable development. It also focuses on ensuring economic growth by requiring local planning authorities to plan positively to meet the development needs of business (paragraph 20). It encourages planning authorities to take a positive approach to determining planning applications and “seek to approve applications for sustainable development where possible”. It further explains that development that accords with an up-to-date Local Plan should be approved, and development that conflicts should be refused unless other material considerations indicate otherwise.

Other Material Considerations

Supplementary Planning Documents

- 5.10 A number of supplementary planning documents (SPDs) have been produced by the London Mayor and London Borough of Hillingdon which are of relevance to this proposal. These include:
- a Accessible Hillingdon SPD (2010);
 - b Planning Obligations SPD (2008), as amended for revised Chapter 4: Education Facilities (2010);
 - c Hillingdon Design and Accessibility Statement SPD (2006);
 - d Affordable Housing SPD (May 2006);
 - e Noise SPD (2006);
 - f The London ‘Mayor’s Housing Strategy’ (February 2010);
 - g West London Strategic Housing Market Assessment (November 2010);
 - h GLA Housing Supplementary Planning Guidance (November 2005);
 - i GLA Interim Housing SPA (April 2010); and,
 - j GLA Housing - Draft Supplementary Planning Guidance (December 2011).

Emerging Planning Policy

London Borough of Hillingdon Local Development Framework

- 5.11 Material considerations may also include the emerging local development framework which is at various stages of preparation. London Borough of Hillingdon submitted their Core Strategy to the Secretary of State on 31 October 2011. An independent Inspector has been appointed to conduct the Examination in Public and this commenced on 13 March 2012.

- 5.12 A Site Allocations Development Plan Document (DPD) was consulted upon in November 2005 but is currently in abeyance. The DPD will include those sites that have not been implemented during the UDP period, including the Thorn EMI Complex at Blyth Road (UDP Policy PR4 and Southern Hillingdon Area Action Plan) (Table 4.1). It is understood that further public consultation on this will take place during 2013.
- 5.13 Similarly, work on the South Hillingdon Area Action Plan (SHAAP) has also been on hold since it was consulted upon (2005). Notwithstanding this, the SHAAP provides some detail about the Council's emerging policies for the future of the Blyth Road site.
- 5.14 The Core Strategy is at a reasonably advanced stage and therefore may carry some weight in the determination of the planning application. However, the Site Allocations DPD and the SHAAP are not at an advanced stage and therefore will carry little weight.

Crossrail

- 5.15 In 2008, a strip of land to the south of the Jubilee Building and The Pressing Plant was designated within the Crossrail Safeguarding Area, within which the proposed Crossrail route is protected from conflicting development. Beyond the site to the south, the safeguarded land continues along the railway line and also includes a strip of land between the railway line and Blyth Road
- 5.16 The Crossrail Safeguarding Direction¹ requires local planning authorities to consult Cross London Rail Links Limited before granting planning permission for development within specified zones. Network Rail is currently re-considering whether this small area is likely to be required.

Key Policy Considerations

- 5.17 A thorough review of all of the national, regional and local planning policies has revealed the following key themes that should be considered in the determination of this planning application:

- 1 The principle and scale of the development;
- 2 Scale and Building Heights;
- 3 Design;
- 4 The job creation and regeneration benefits of the proposal;
- 5 Housing Mix;
- 6 Affordable Housing;

¹ Crossrail Safeguarding Directions, Old Oak Common to Maidenhead, January 2008, Volume 3 – Sheets 319 and 320)

- 7 Town Centre assessment;
- 8 Amenity issues (including daylight sunlight, noise and air quality);
- 9 Heritage;
- 10 Sustainability;
- 11 Highway Impact; and
- 12 Transportation matters (including parking and servicing).

5.18 These do not cover the full range of factors which will be of relevance to this proposal but comprise the key themes which have been reviewed to establish the principle of acceptability of the proposal.

5.19 There are additional factors which are relevant to the determination of this application but which deal less with the principle of development and more with detailed environmental assessment.

Full details of the environmental assessment can be found within the other documents submitted with this application, as set out in Section 1 of this report.

6.0

Development Appraisal and Policy Analysis

Principle of Development

6.1

In employment terms, the site is covered by the following designations:

- 1 Preferred Industrial Location (designated by the GLA as a Strategic Industrial Location or SIL); and,
- 2 Industrial and Business area (Hillingdon UDP).

6.2

The planning justification for the proposed mixed use scheme that incorporates residential development is summarised as follows:

- 1 The Council's Employment Land and Retail Capacity statement (2010) concludes that there is more employment land supply than is currently needed and that part of the Blyth Road allocation is to be identified within the emerging Core Strategy for managed release for a mixed use development.
- 2 The historic consent for development to the east of the site has already established the principle of mixed use development at the site. An earlier consent (approved in 2001) allows works to enable B1 use of the Cabinet Building, Shipping Building and Record Store, with 1,590 parking spaces.
- 3 The site has been marketed on the basis of the historic consents but, with the exception of the Shipping Building which is part occupied, the majority of floorspace remains vacant. A summary of the marketing undertaken to date is set out below at paragraphs 6.19 and further details are set out within the 'Office Space Demand Report (submitted under separate cover and on a confidential basis to the Council).
- 4 A 'business park' approach has failed to attract occupiers to the site, a new approach that creates a campus environment will attract employers who are seeking to provide a higher quality environment for employees. In this regard there have already been a number of positive enquiries received from potential occupants. This is also explained further in the Office Space Demand Report.

6.3

These factors are considered in more detail below.

Policy Context – release of employment land

6.4

The Hayes Industrial Area is designated as a Preferred Industrial Location (PIL) in the adopted London Plan (2011) which, alongside Industrial Business Parks (IBP), are defined as Strategic Industrial Locations (SIL). The London Plan identifies that SILs are London's '*main reservoirs of industrial and related capacity*' and Policy 2.17 states that development proposals within SILs should be refused unless:

"a) they fall within the broad industrial type activities outlined in paragraph 2.79; or,

b) they are part of a strategically co-ordinated process of SIL consolidation through an opportunity area planning framework or borough development plan document; or,

c) the proposal is for employment workspace to meet identified needs for small and medium sized enterprises (SMEs) or new emerging industrial sectors; or,

d) the proposal is for small scale ‘walk to’ services for industrial occupiers such as workplace crèches or cafes”.

6.5 With respect to retained but now-dated local planning policy (LB Hillingdon Unitary Development Plan), the site is also identified as an Industrial and Business Area (IBA). Policy PR4 identifies that development at the site should be for employment generating uses, namely B1, B2 and B8 uses only. UDP Policy LE2 identifies that the Local Planning Authority will not permit development for other uses in IBAs unless:

- 1 There is no realistic prospect of the land being used for industrial or warehousing purposes in the future;
- 2 The proposed alternative use does not conflict with the policies and objectives of the plan; and,
- 3 The proposal better meets the plan's objectives particularly in relation to affordable housing and economic regeneration.

6.6 The Council’s emerging Core Strategy (Submission Core Strategy, July 2011) is currently under Examination and identifies the Hayes Industrial Area as one of the three PILs (Preferred Industrial Location) in Hillingdon, suitable for industrial, wholesale distribution, waste management and recycling (Core Strategy, Para 5.6).

6.7 However, the Borough’s Employment Land Study (July 2009), which forms a background technical study to the Core Strategy, identifies that there is more employment land supply than is currently needed and recommends the managed release of land (a reduction of non-compatible uses and a further release of employment land). Specifically, this includes the recommendation for the removal of 4.32ha of land between Hayes and Harlington station up to and including the former Phoenix House (now referred to as Record Store) for release to mixed uses, including limited housing, to bring more people back into the town centre. The rest of the site (comprising the car park, Cabinet and Shipping Building) is recommended for a Strategic Employment Land status as the Hayes Industrial Area – Preferred Industrial location (Employment Land Study, recommendation 15, p. 165).

6.8 The Council’s Position Statement (“Hillingdon’s employment land and comparison retail floorspace June 2010”) identifies that the Core Strategy will include a policy on the release of 17.58ha of designated employment land through the plan period. This will be implemented through the Site Allocations DPD, which will include formal boundary changes and detailed site allocations (p. 7, para 3.10). However the Core Strategy identifies that part of Blyth Road area is proposed for the managed release of employment land (Submission Core Strategy, para 5.11).

- 6.9 In response to the Inspector's questions in advance of the Examination, the Council explains that the limited release of industrial land mirrors wider economic trends of declining industrial uses across London reflecting the reality that the manufacturing and industrial sector in the UK is continuing to decline (para 4 Hearing 3 Statement).

Historic Consent – Principle of mixed use development at the site

- 6.10 When considering the principle of mixed uses at the site it is necessary to consider the previous planning permissions for development at the site.

2001 Consents²

- 6.11 In 2001 planning permission was granted for alterations to the parking (1,590 car parking spaces) and landscaping of the site, including the formation of new accesses onto Blyth Road. At the same time planning permission was also granted for the refurbishment of the Shipping Building, the Cabinet Building and the Record Store (Total B1 office space: 47,800 sqm). Both planning permissions have been commenced, in that the Shipping Building has been refurbished and around 550 car parking spaces have been provided. The Shipping Building is currently part occupied by SITA Aero (specialising in air transport communications and IT solutions), which has occupied half of the ground and all of the second, third and fourth floors since 2001 (60,000 sq ft - approx. 5,570 sqm in total).
- 6.12 The remainder of the scheme can still be implemented. This would result in the refurbishment and extension of the Cabinet Building, refurbishment of the Record Store and the provision of around 960 further car parking spaces³.

2009 Approved Floorspace

- 6.13 In 2009, planning permission was granted for a mixed use scheme in the east of the site⁴. The scheme comprised commercial floorspace of 14,464 sqm and 244 residential units. This application covered an area of 2.1 ha and included Jubilee Building, Power House (Neptune), The Vinyl Factory and Pressing Plant (the Shipping Building, Cabinet Building and Record Store were excluded).
- 6.14 The 14,464 sqm of commercial floorspace, comprised 13,257 sqm existing B1 and 1,207 sqm new floorspace. A breakdown of the approved areas is set out in the table below.

² LPA ref. 51588/APP/2000/1418 and 51588/APP/2000/1827

³ The 2001 consent approved 1,590 parking spaces, around 550 of which have been implemented. Excluding the additional parking to the east of the site in the area now occupied by the Gatefold planning permission (76 spaces), approximately 960 additional car parking spaces can be implemented on site.

⁴ LPA ref. 59872/APP/2007/3060

Building Name	Approved non residential floorspace (2009)	Approved mix of Uses
Apollo (Pressing Plant)	5,267 sqm	A1, A2, A3, A4, A5, B1, B2, D1, D2
Jubilee	6,084 sqm	A1, A3, A4, A5, B1, B2, D1, D2
Neptune (Power House)	1,906 sqm	A3, A4, A5, B1, D1, D2
Residential Block B	388 sqm	A1, A3, A4, A5, B1, D1, D2
Block C	819 sqm	A1, A3, A4, A5, B1, D1, D2
Total	14,464 sqm	

- 6.15 The application sought a flexible consent of this floorspace for A1, A3, A4, A5, B1, B2, D1 and D2. However, the planning permission includes a condition requiring that no more than 2,000sqm (GEA) of Jubilee and Apollo (Pressing Plant/Vinyl Factory) shall be used for uses outside of B1 and B2 Use Classes. The remaining floorspace within Neptune, Residential Block B and Block C could be a mix of A, B or D Class uses, although there are planning conditions that require that the floorspace shall be subdivided between a minimum number of separate use classes and which excluded the A1 uses from the sale of clothing, footwear, DIY, furniture and gardening products or car parts.
- 6.16 In order to compare the 2009 consent to the proposed new masterplan, it is necessary to include the remaining existing buildings on site which were not included in that consent but which benefit from a commenced planning permission for refurbishment i.e. the existing refurbished floor area of The Shipping Building and the proposed floor areas for The Cabinet Building and The Record Store which total 46,005 sqm (GEA). In allowing for this floorspace the whole development would comprise **244 residential units and 60,433 sqm (GEA) of commercial floorspace**. Of this floorspace **approximately 5,000 sqm could be used for A Class** (retail, shops, restaurants, café bars/ hot food takeaway) **or D Class uses** (non residential institutions and assembly and leisure). (See comparison schedule contained within the Design and Access Statement)
- 6.17 The 2009 consent has yet to be implemented. However, an application to extend the period of time in which the permission can be implemented has been submitted to Hillingdon Council and remains pending (Council Ref: 59872/APP/2011/1691).
- 6.18 This recent 2009 consent for development to the east of the site has confirmed the principle of mixed use development at the site, whilst the earlier consent (2001) allows continuing works to enable B1 use of the Cabinet Building, Shipping Building and Record Store, with the rest of the site to comprise 1,590 parking spaces.

Marketing of the site to date

- 6.19 The site has been extensively marketed for business/industrial uses but there has been little interest and take up rates have been low. Of the 43,297 sqm (GEA) of existing floorspace contained within the group of the Shipping Building, Cabinet Building and Record Store, only 5,570 sqm (13% of the total floorspace) is occupied.
- 6.20 A detailed review of the measures taken to market the site is set out in the Office Space Demand Report. This report has been submitted to the Council on a confidential basis and includes a review of both the active marketing of the site following the approvals granted in 2001 and 2009 and the ongoing marketing that has taken place since the applicant purchased the site. However, given the low occupancy rates (there have been no new lettings since 2001), a new approach to development at the site is required. It is considered that the proposed 'mixed community' approach will enable the phased, mixed use redevelopment of the site, which will facilitate the use of the existing accommodation with the Cabinet Building, Shipping Building and Record Store as well as addition new office accommodation, housing, retail and leisure floorspace. The revised approach to job creation via such a campus development is set out in section 6.0.

Revised approach to job creation – the campus environment

- 6.21 The previous approach to the site sought to create a business park that would have delivered an unimaginative set of buildings which only recognised its setting against the heritage assets rather than embracing their proximity and the need to enhance the conservation area. The new design now seeks to reinforce the regeneration of Hayes and does so by creating a high quality public realm that complements and enhances the important heritage of the site and existing routes.
- 6.22 The regeneration of the site will be phased. The refurbishment of employment space in the existing dilapidated buildings and the creation of new employment/commercial floor space will be linked to the creation of new residential development to establish a new community and a bustling environment for living and working – and not a site that is empty during the evening. It seeks to create an exciting, high quality mixed use environment where people want to work and will assist in removing the misconceptions of Hayes as an old industrial area with little to offer for new businesses.
- 6.23 The first phase of the masterplan has commenced via an investment of over £800,000 into the Shipping Building to create a new reception and arrival point as well as a new gallery space and café for staff. The new café and reception area has been a great success with staff located within the Shipping Building and bicycles have also been provided for use by staff who wish to cycle into the town centre in their lunch breaks. The Shipping Building is currently part-occupied, with the remaining space being marketed for office use. The proposed campus will uncover and celebrate the unique heritage of the site and offer something different to the innovative international companies whose

investment is critical to London's economy. Work is also underway to establish an incubator unit scheme on site at the former marketing suite in collaboration with Brunel University. This will seek to retain graduates within the Hayes area and encourage them to start new businesses which will hopefully become new employers in the future.

- 6.24 The second phase of development at TOVF site will be the implementation of the Gatefold planning permission which comprises 132 residential units, 5 workshop units (279 sqm), a cafe (108 sqm) and community room (97 sqm).
- 6.25 The subsequent implementation of the wider masterplan will provide a wide package of employment and economic benefits for the local area and beyond. It will meet local and London-wide objectives for employment creation and:
- 1 Bring around 4,000 jobs on a permanent and long-term basis back to the once-teeming Old Vinyl Factory (this equates to 2% of the jobs that Mayor Boris Johnson has identified will be created within London over the next four years);
 - 2 Result in net additional indirect and direct induced jobs spread across the local area (estimated at 5,540 jobs);
 - 3 The provision of discounted rent incubator and starter employment units;
 - 4 Provide business floorspace and employment opportunities at a strategic location – close to London (at a proposed Crossrail station) and Heathrow airport;
 - 5 Reposition The Old Vinyl Factory as a regional employment hub – for the first time since the heyday when groups such as The Beatles were linked to the site; and
 - 6 Result in £200M of capital investment.
- 6.26 The creation of a high quality public realm is an additional public benefit that will result from the regeneration of the site. The illustrative masterplan includes approximately 16,700 sqm of public realm in the form of The Groove, new shared surfaces, streets and squares, alongside a landscaping scheme that will soften the appearance of the site – a significant benefit in comparison to the existing site which is dominated by surface level car parking. In addition and in accordance with the GLA guidelines, private amenity space/communal amenity space and children's play areas will be created (The illustrative scheme includes over 12,500sqm of private/communal amenity space and over 1,250 sqm of children's play space).
- 6.27 Together with the Gatefold Building, the masterplan will deliver up to 642 additional residential units to the area, which will help to address local housing need through the delivery of a mix of units (1, 2, 3 and 4 bedroom units) in line with the emerging need for West London. Some of this housing will also be affordable which will further contribute to the Mayor's Housing Policies.
- 6.28 The proposed outline masterplan application seeks consent for up to 7,886 sqm (GEA) of additional B1 floorspace, alongside up to 4,000 sqm (GEA) of A Class uses and up to 4,700 sqm (GEA) of D Class uses. The proposed

masterplan will also facilitate the B1 use of the Shipping Building, Cabinet Building and Record Store which will be fully converted in accordance with the 2001 planning permission. A separate application for works to the Cabinet Building will also result in an additional 3,219 sqm (GEA) of B1 floorspace to be located with rooftop Cabinets and associated additions.

- 6.29 The proposed masterplan and application for works to the Cabinet Building, including the further implementation of the 2001 consent, will result in a minimum of 51,750 sqm (GEA) of B1 floorspace at the site or a maximum of 54,750 sqm (GEA) of B1 floorspace. This is a significant benefit in comparison to the 5,570 sqm (GEA) of currently occupied B1 floorspace.
- 6.30 The site will remain predominantly commercial – the illustrative scheme (including the Shipping Building, Cabinet Building, with Cabinets and Record Store) has a split of 57% commercial to 43% residential.
- 6.31 The B1 offer remains substantial in comparison to the existing occupied space and is similar, but slightly larger in area, to the implementation of the 2001 and 2009 consents.
- 6.32 It is important to note that the proposed development will result in the creation of B1 floorspaces that are more flexible and include up to 3,700 sqm (GEA) incubator units – for which there is an identified need. Additional employment floorspace, in the form of leisure/recreation facilities is also proposed, which will result in further employment benefits.
- 6.33 The 2009 mixed use masterplan was unimaginative and did not seek to enhance the conservation area. Without the proposed development, the land to the north and east of the Cabinet Building/Shipping Building would remain a car park, which is not an employment generating use as promoted by the GLA SIL designation.
- 6.34 The proposed development will therefore result in significant benefits in terms of both job creation and housing provision.

Scale of Development

- 6.35 Land for development within London is a scarce resource and opportunities for development or redevelopment should seek to maximise its efficiency in line with national policies which seek sustainable development. This approach is grounded through a number of policies within the National Planning Policy Framework (2012) including the principles that planning should;
- “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value...”* and,
- “actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable...”*

- 6.36 For the NPPF, the overriding theme or ‘golden thread’ is a presumption in favour of sustainable development. This positive approach to planning is also established in the London Plan with the Mayor’s main thrust to plan for growth.
- 6.37 Policy 1.1B seeks to accommodate this growth within London’s boundaries without encroaching on the Green Belt or open space. To this end, Objective 5 of The London Plan recognises the need to consume and use resources more effectively – this includes land. This closely links with Objective 6 of the plan, which seeks to deliver an easy, safe and convenient city with an efficient and effective transport system.
- 6.38 Whilst Paragraph 2.4 of the London Plan explains that the most efficient use of London’s limited reserves of land will need to be made, the Plan does not promote mindless high density development. Instead, it focuses on the need to deliver homes and jobs in appropriate locations without having unacceptable impacts upon the environment (Policy 1.1 - B).
- 6.39 Specifically for proposals within Outer London, the Plan explains that growth should be managed in a way to improve quality of life and opportunities and proposals should be sensitively tailored to local circumstances ensuring that the existing, generally, higher quality of life (compared with other parts of London) are not compromised (Para 2.31).
- 6.40 The London Plan’s strategic transport policies seek to encourage patterns of development which take advantage of sustainable forms of public transport and accessibility (Policy 6.1). This includes supporting development which generates high levels of trips in sustainable locations (Policy 6.1 A c). The site sensitively maximises its potential given its proximity to the railway station (with imminent connections across London) and bus stop (which provide up to 40 services an hour).
- 6.41 The proposed development seeks to maximise the quantum of development on TOVF site in order to take full advantage of its existing and future public transport provisions (whilst considering local market demands), the proximity to the town centre, and the objectives to utilise previously developed land to its full potential in order to protect other land (such as open space) from development. In so doing, the proposal seeks to deliver new employment floorspace. The employment (B1, leisure and retail uses) and residential uses will together create a lively and attractive location for business.
- 6.42 The proposal is entirely located on previously developed land. The proposal addresses the opportunity to make the most efficient use of the limited land reserves in a sustainable location.
- 6.43 The scale of individual uses is further considered in the next section of this report.

Residential Density and Building Heights

- 6.44 The London Plan requires developers to maximise the potential of sites in line with the sustainable residential quality density matrix (Table 3.2). This sets out the Mayor's guidance on appropriate densities for housing in different areas, depending on proximity to public transport. As the site lies adjacent to the town centre of Hayes and is characterised by two to four storey building heights, the application site falls within the 'urban' category for setting.
- 6.45 It crosses three PTAL boundary ratings; following the implementation of Crossrail, the PTAL ratings will range from 2 to 4. For PTAL 4 to 6 sites, the London Plan indicates an appropriate density range of 200-700 habitable rooms per hectare (hrh) or 45 – 260 units per hectare.
- 6.46 Whilst up to 510 units are proposed across the 5.0ha site, residential development is not spread evenly. A calculation has therefore been undertaken based on the GLA's London Development Database which provides guidance on residential densities for mixed use schemes.
- 6.47 The scheme's masterplan architects have calculated the density based firstly on the application site boundary and secondly on the predominantly residential buildings and the areas immediately surrounding the buildings.
- 6.48 The resultant densities for the illustrative scheme are 179 units per hectare and 212 units per hectare respectively and 499 hrh and 590 hrh (see Design and Access Statement for a detailed breakdown of areas). This is in line with the London Plan's quality density matrix for sites of PTAL rating 4 and above.
- 6.49 The masterplan has been designed to maximise the efficient use of the site. It also seeks to meet the policy criteria of Policy 7.6 of the London Plan, which requires that the buildings make a positive contribution to the street and wider cityscape, particularly the buildings to be retained on site and the nearby listed Enterprise House. The Design and Access Statement submitted with this application explains the design concept in detail.
- 6.50 It is also necessary to confirm that the heights of the proposed buildings are appropriate for the area.
- 6.51 We note that the scale of development surrounding the site is varied; to the south east and north east are a mixture of two storey dwellings, to the north are 5 to 7 storey commercial buildings, the approved Gatefold Building to the east of the site will be between 5 and 7 storeys and to the east beyond the Gatefold Building and adjacent to the railway station are 10-storey apartment blocks.
- 6.52 The existing skyline therefore reveals a variety of heights. This outline planning application sets upper and lower parameters for each of the buildings. These are shown on the accompanying application drawings. This equates to approximately 2 to 10 storeys, depending upon the details of the reserved matters application which will be submitted in due course. The parameters will ensure that existing positive features and heritage assets are preserved.

- 6.53 Paragraph 7.25 of the London Plan defines tall and large buildings as those that are substantially taller than their surroundings, that cause a significant change to the skyline or that are larger than the threshold size for referral to the Mayor. There are elements of development within the site (The Veneer Building pop up, Powerhouse Chimney and Material Store pop up) where the parameters will allow development that exceeds the criteria for referral of an application to the Mayor, (buildings that exceed 30m outside the city of London) and fall within the London Plan definition of "tall".
- 6.54 Whilst the London Plan (Policy 7.7) identifies areas where tall buildings will be appropriate, it sets out criteria to apply to tall buildings. In relation to the proposed masterplan, although not identified within a specified tall building area, the proposals meet the policy criteria as set out:
- 1 the character of the area will not be adversely affected by the proposed scale, mass or bulk of the proposed building. Indeed, the proposed development will respect the industrial scale of the existing prominent buildings on site and will significantly improve the site's appearance whilst respecting its surroundings, particularly Enterprise House and the lower scale residential development to the south west;
 - 2 the proposed building parameters have been specifically designed to relate to the form, proportion, composition, scale and character of surrounding buildings and public realm (see specifically the DAS, Heritage and Townscape/Visual Impact Chapters of the ES);
 - 3 the legibility of the area is enhanced by introducing a new public route (The Groove) through the site to Dawley Road and the proposals will enhance the approach along Blyth Road from the station;
 - 4 the proposed design and materials will be of high quality and incorporate sustainable design and construction (see DAS);
 - 5 the creation of new routes through the site, lined by active uses at street level (including bars and cafes), will create activity and provide beneficial facilities for occupiers of the site and visitors. This scheme will result in the regeneration of the site and will enhance the character of the conservation area currently identified as being 'at risk';
 - 6 The proposals assist permeability through the creation of new routes and additional access points through the site;
 - 7 Public access to upper levels within buildings will be provided, but within the residential buildings, for safety and security purposes, access will be restricted to residents and their visitors; and,
 - 8 The proposed development will result in a significant enhancement to the existing environment. The Socio Economic Assessment explains the impacts including job creation and benefits to the local area, contributing to the Council's aspirations for regeneration of the borough.
- 6.55 The site is considered to be a suitable and appropriate location to provide a higher density residential development and make a significant contribution in assisting LB Hillingdon in meeting strategic housing targets.

- 6.56 A full assessment of the impact of the proposals on the existing townscape and key representative views is contained at Chapter 7 of the ES. Whilst the proposed redevelopment of the site will be visible from a number of viewpoints the ES identifies that the proposals do not give rise to any adverse townscape or visual effects. It concludes that the investment in the site, the provision of new facilities, an improved public realm and creation of a mixed use development will together enhance the townscape both visually and in terms of introducing activity and vitality to both the historic site and its wider context.

Design

- 6.57 High quality design is promoted throughout planning guidance and policy at a national, regional and local level. Indeed the NPPF identifies that *“Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.”* (para 56)
- 6.58 The Council’s adopted and emerging planning policies promote high quality design and developments that protect existing residential amenity. The scale, massing and design of the proposed development are especially important as the site is visible from the mainline Paddington to Bristol railway. In meeting the requirements of Saved Policy BE35, the LPA will seek to ensure that:
- i *“Development is of a high standard of design, layout and landscape;*
 - ii *Where opportunities arise, attractive views and important local landmarks are opened up from these transport corridors.”*
- 6.59 London Plan Policy 7.1 sets out a series of overarching design principles for development in London. New development is also required to have regard to its context, and make a positive contribution to local character within its neighbourhood (policy 7.4).
- 6.60 The Design and Access Statement explains in detail the design considerations and evolution of the proposal. It includes a summary of the aspirations of this unique mixed use development, sets out the proposed landscape strategy as well as consideration of materials and accessibility. It demonstrates that the proposed development will create a high quality mixed use development that will significantly enhance and improve the existing locally listed buildings on site, improve legibility and create a secure and accessible environment that will make a positive contribution to the surrounding area. The proposals will also enhance the setting of the adjacent listed building (Enterprise House) and will enhance the industrial character of the conservation area and secure the future use of a number of key locally listed buildings within the site. This will build upon the award-winning designs approved by the London Borough for the Phase 2 Gatefold Building.

The job creation and regeneration benefits of the proposal

- 6.61 The emerging Core Strategy paints a useful and up to date 'portrait' of the London Borough of Hillingdon. In recognising that the Borough is one of contrast, it states that most of the area south of the A40 finds itself in the top 40% nationally in terms of deprivation (Para 3.2). Hayes itself has a proud industrial history of manufacturing and TOVF site is no exception.
- 6.62 The London Plan's foremost purpose is to 'plan for growth', with this principle objective running through the policies reflecting a post-recession national growth agenda promoted by the coalition government. The aspiration of Purplexed LLP for TOVF site is to deliver a regenerated mixed use development which will provide a wide package of employment and economic benefits for the local area and beyond. It will meet local and London-wide objectives for employment creation and bring around 4,000 new jobs on a permanent and long-term basis back to the once-teeming Vinyl Factory in those sectors that offer the greatest potential for growth – which are presently under-represented locally and for which there are a large number of jobseekers. It will provide business floorspace and employment opportunities at a strategic location and reposition TOVF as a regional employment hub.

Subsidised employment space

- 6.63 A total of around 3,700 sqm of affordable employment space will be provided within the site to assist new business opportunities. This will include incubator business units (allowing for mezzanines) on the Groove and adjoining streets, to be created in a phased way as the site is developed. Within the Machine Store (ground and first floor levels) towards the east, the affordable workspaces will be of slightly larger sizes to accommodate growing businesses.
- 6.64 These will be offered at only 70% of normal commercial rents (as assessed by independent valuation). This will allow subsidised access to space for new businesses and, importantly, secure early full occupation of these spaces to assist reinvigoration and regeneration at TOVF. With an average occupancy of around 1 person per 10 sqm, this will mean that around 370 jobs can be established in such spaces from the outset, with a waiting list of businesses seeking similar assistance.
- 6.65 Final occupation basis is yet to be agreed but the intention is that these should be easy-in and easy-out spaces with shorter lease periods and appropriate regular break opportunities.
- 6.66 A review mechanism will be built into the leasing programme, such that, in the event of substantial occupancy across TOVF as a whole, the need for subsidy for the incubator spaces might fall away over 20 years or so as the scheme becomes merely a successful component of the wider Hayes economy.
- 6.67 It is recognised that the former EMI factory is a key regeneration opportunity (and need) for Hillingdon generally and that job creation will need to be at the

heart of this effort. With an overall target of some 4,000 jobs, key objectives are to support the image of the location as a vibrant and creative environment sufficient to genuinely attract larger tenants for the larger spaces located within the Shipping, Record and Cabinet Buildings.

- 6.68 The presence of the affordable workspaces alongside will assist greatly in achieving this objective, even though the subsidy offered will have some effect on overall scheme viability. Such subsidy is nevertheless essential for the primary purpose of securing early new jobs on Strategic Employment Land, for both Hillingdon and London generally.

Job Creation

- 6.69 The expenditure by new firms and employees at The Old Vinyl Factory will also support induced and indirect employment in local shops, services and businesses. An application of normal employment multipliers to the 4,000 or so net additional FTE jobs that will be generated by the development proposal produces an additional 1,630 "spin-off" jobs across London, of which 815 will be concentrated in local services and firms around Hayes and Hillingdon.

- 6.70 In addition the construction of the development would be expected to create 120 permanent direct jobs in the construction industry, equivalent to 1,200 person-years of construction employment over the duration of the build period.

- 6.71 The initial direct spending will result in substantially larger economic benefits as this expenditure is transmitted through the economy in the form of:

- 1 Purchases from a range of suppliers who, in turn, purchase from their own suppliers through the supply-chain; and,
- 2 Temporary increases in expenditure linked to the direct and indirect employment effects of the construction phase.

- 6.72 There are only about 500 jobs at the application site at this time, so the proposed development will change the profile of Hayes and will be critical in helping to attract further investment and to stimulate the attraction of additional jobs in LB Hillingdon and West London more generally.

- 6.73 The site has been allocated in both the LB Hillingdon Core Strategy and the previous Unitary Development Plan 'UDP' (Thorn EMI Complex, Blyth Road, PR4) for employment generating uses comprising B1, B2 and B8 uses only. However, the LB Hillingdon Employment Land Study acknowledges that there is capacity to accommodate the proposed level of office floorspace and highlights Hayes' availability of opportunity sites and high levels of public transport and private car accessibility as establishing an appropriate location for such provision. It is therefore already recognised that this site could be partly released for alternative uses.

- 6.74 It is also necessary to understand how the second phase development (The Gatefold Building), as permitted earlier in 2012, will be used to facilitate and encourage the regeneration of the remainder of the masterplan site. The development of dwellings and subsidised workspaces in this initial phase is

essential for the medium-term development of the wider masterplan area. There is a need to give confidence of an active and complete use of the entire site to encourage full occupation of the main office buildings, rather than being in a 'sea of nothingness'.

- 6.75 The delivery of attractive units which will create these jobs is a key part of the regeneration proposals for the site. However, the provision of units for employment units is only one element and the success of the development depends on the integration of a mix of uses which will provide social, economic and physical regeneration to this part of Hayes.
- 6.76 The mixed use development which is needed to finance the regeneration and building restoration work (in an 'at risk' conservation area) will be just that – new homes, new leisure spaces, new attractive public realm investments to improve the image of Hayes and increase its offer to Londoners.
- 6.77 Furthermore, the development itself includes the provision of an events venue and new public open space which can be used by the local community. Therefore, whilst the new residents would increase demand for existing community facilities within the locality, the development would also give back to the Community by providing new and alternative facilities and spaces for both the existing and new local residents.
- 6.78 Importantly, TOVF will be an important component of the local economy, offering new jobs and new homes which are currently not available to local people. It will add greatly to activity in the nearby Hayes Town Centre.

Housing Mix

- 6.79 The London Plan's (2011) strategic policy on increasing housing supply recognises that there is a 'pressing need' for more homes in London which provide real choices for Londoners (Policy 3.3A). Whilst the London Plan identifies that the provision of family housing is a priority (policy 3.11A), it is noted that homes should be both affordable and meet requirements for different sizes and types of dwelling in the highest quality environments (Policy 3.8).
- 6.80 The overall scheme for TOVF site includes 642 residential units (including 132 units forming part of the approved Gatefold Building development). This outline application proposes up to 510 units based upon the following housing mix:
- one bed = 40%
 - two bed = 45%
 - three bed = 10%
 - four bed = 5%
- 6.81 The London Plan requires new developments to offer a range of housing choices which reflect needs at a local, regional and national level (Policy 3.8).

- 6.82 The UDP identifies that there is a shortage of smaller dwellings in the Borough (Para 7.10) and Policy H4 supports a mix of units, in particular one or two bedroom units:

“Wherever practicable a mix of housing units of different sizes should be provided in schemes of residential development including in particular units of one or two bedrooms. Within town centres predominantly one and two bedroom development will be preferable.”

- 6.83 The proposed development therefore favours smaller units (one and two bedrooms) and is in compliance with the UDP policy. Notwithstanding this, there is recognition that the UDP is somewhat dated and there have been more recent studies on housing need both locally and regionally which should be examined.

- 6.84 At the London level, the Mayor’s SPG on Housing published in 2005 comprises current adopted guidance. However, the Mayor is in the process of producing updated guidance (consultation version issued in December 2011). These documents include a London-wide net housing requirement over fifteen and ten year periods respectively and are set out in Appendix 2 of this Planning Statement.

- 6.85 In summary, the generalised London-wide requirements are identified as follows:

Housing Sector	2005	2011
Market Sector	2/3 bedroom (75%)	1 bedroom (39%) 2 bedroom units (47%)
Intermediate	1 bedroom (66%) 4+ bedroom units (34%),	3+ bedroom units (86%)
Social Sector	predominantly 2/3 and 4+ bedrooms	2 bedrooms (61%) 3+ bedrooms (39%)
All Tenures	1 bedroom (32%), 2/3 bedroom (38%) and 4+ bedroom (30%)	1 bed (17%) 2 bedroom units (50%) 3 bedroom (33%)

- 6.86 In addition to the above guidance, the Mayor has produced interim guidance for the London Housing Strategy (2010). This identifies that more family sized homes are required, particularly affordable homes, and sets a target for 42% of social rented homes and 16% of intermediate homes having 3 bedrooms or more.

- 6.87 The proposed mix for TOVF broadly meets the emerging GLA’s draft standards (2011) for market housing but favours 1 bed units over the provision of 3+ bed units (which therefore varies somewhat from the GLA’s London-wide emerging guidance for all tenures – but this is in view of the site’s particular location and characteristics).

- 6.88 The Hillingdon Housing Market Assessment (2009) has been produced as part of the evidence base for the LDF and identifies the following in respect of the Borough as a whole:

- 1 Around half of the requirement for new housing is for market accommodation;
- 2 Almost all new market housing should have three or more bedrooms;
- 3 Almost 45% of new intermediate housing should have three bedrooms; and,
- 4 Almost three quarters of social rented dwellings should have three or more bedrooms (HMA, page 73).

6.89 These points are replicated in the Submission draft Core Strategy (Sept 2011, para 6.30).

6.90 In terms of size of housing required, the report identifies that 40% should be smaller (1 & 2 bedroom) dwellings and 60% should be larger (3 & 4 bedroom) properties (HMA, page 98).

6.91 However, this work has been updated through the more recent housing study (The West London Strategic Housing Market Assessment 'SHMA', 2010) produced by the West London Housing Partnership (including LB Hillingdon) and which also forms part of the evidence base for the emerging Core Strategy.

6.92 The update study provides an assessment of the existing and proposed housing requirements across West London and identifies that Hillingdon has a higher proportion of larger dwellings, with approximately only 23% being flats. In comparison, the housing stock in Hounslow is 37% flats and in Ealing 42%.

6.93 The SHMA also identifies the five year requirement of housing by type and size at a borough level. For Hillingdon, the identified requirement is as follows:

Size	Housing Tenure*			
	Market	Intermediate	Social	All tenures
1 bedroom	226	514	(30)	737
2 bedrooms	2167	(249)	551	2520
3 bedrooms	(1,556)	53	208	(1,181)
4 bedrooms	130	(150)	12	(1)
Total	967	167	741	1,875

Source: Figure 92: West London Strategic Housing Market Assessment 2010 (Borough Level 5-year Housing Requirement by Housing Type and Size for Minimum Draft Replacement London Plan Delivery)

* Figures in brackets () denote a negative number

6.94 These most recent projected five year requirement figures for Hillingdon demonstrate that:

- there is an over provision of three bedroom properties for market housing; and.
- the need for larger units within the intermediate and social sector is generally low.

- 6.95 The focus on the provision of 1 and 2 bedroom units for the masterplan is therefore supported by the most recent West London SHMA, across all tenures generally. The proposed development would therefore assist in meeting local need and provide new accommodation in close proximity to the town centre and Hayes and Harlington Station (see paragraphs 4.5-4.8).
- 6.96 In line with the findings of the West London Housing Market Assessment a review of the housing market in Hayes by Savills has identified that the residential stock in Hayes is predominantly suburban family housing, built after World War I. The report identifies that just 21% of the stock traded in 2010 was flatted (in comparison the London wide figure was 50% and elsewhere in outer London 35% of properties traded in 2010 were flatted). It is also noted that the arrival of Crossrail will accentuate growth within Hayes, particularly in the owner occupied sectors.
- 6.97 We also record that the Mayor raised concerns in 2011 over the imminent shortage of smaller units throughout London in the event of active decanting of households arising from national-level housing benefit changes being introduced by the Coalition Government (i.e. downsizing within subsidised housing).
- 6.98 TOVF is an atypical housing site in Hayes, being part of an employment-led and high density mixed use scheme for which conventional garden spaces are not possible. Such a site is intrinsically less suited to family occupation through its emphasis on medium-rise apartments, proximity to busy evening leisure and entertainment activity and higher density expectations in an edge-of-centre location.
- 6.99 The site lends itself to higher density and smaller units to meet the expected lifestyle of residents in this highly sustainable location, maximising the opportunities for living in close proximity to the town centre and the Crossrail station and extending the range of choice of living environments within the Borough. It will add to the range of housing environments in the Borough, benefiting housing choice.
- 6.100 A core demand for the new market/private apartments within Hayes will come predominately from first time-buyers and young professionals, attracted by the accessibility of the area to central London (particularly by public transport), the central location, the close proximity of local services/ shops, and the relative affordability of house prices within Hayes. This will be complemented by accessibility to new types of housing for local people seeking to stay within the local area.
- 6.101 The inclusion of higher proportions of smaller units in accordance with these recognised objectives will assist in increasing intrinsic value per sqm for the residential component – with the benefits of supporting essential heritage and employment development requirements whilst maximising the opportunity to support affordable housing to higher levels.
- 6.102 In the light of these conclusions, the proposed mix of 40% one bed and 45% two bed units is both desirable and consistent with policy and the inclusion of

10% three bed and 5% four bed units will extend the range of units and allow for flexibility.

- 6.103 The proposed housing unit mix has been agreed with officers at Hillingdon Council.

Affordable Housing

- 6.104 The 2011 London Plan does not set an all-London affordable housing target - rather, it leaves decision making on the quantum of affordable housing to individual boroughs. Policy 3.11 of the London Plan states that 60% of affordable dwellings should be social rented with the remaining 40% to be intermediate.
- 6.105 The Council's emerging Core Strategy (drafted before the recent new London Plan) seeks a net affordable housing provision of 35% with a 70/30% split between social rented and intermediate housing, *'subject to viability and if appropriate in all the circumstances'*. The Council will also seek to ensure that the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units.
- 6.106 The planning application proposes up to 510 dwellings and a number of these will be affordable. The exact number will be subject to agreement with the London Borough of Hillingdon, reflecting the mix of other benefits offered by the scheme.
- 6.107 Policy 3.12 of the London Plan states that in seeking the maximum reasonable amount of affordable housing, it is necessary to have regard to the need to encourage, rather than restrain, development and to promote mixed and balanced communities.
- 6.108 In addition, the NPPF Paragraph 173 states that to ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.
- 6.109 A viability assessment has therefore been submitted to the London Borough of Hillingdon on a private and confidential basis in order to indicate viability impacts on provision of affordable housing. It demonstrates that the scheme yields a negative result.
- 6.110 For the purposes of the Environmental Impact Assessment, provision of 5% of affordable units and 5% Hillingdon Council's First Time Buyers Scheme has been assessed (10% in total). The exact provision will be negotiated with the Borough based upon the independent analysis of the viability appraisal. The tenure split for these affordable units will also be subject to negotiation during the determination of the planning application.
- 6.111 This is notably less than the Borough is generally seeking through the emerging Core Strategy but reflects the significant constraints on the site, initial viability

outputs and the significant parallel investment in employment spaces and building restoration (the refurbishment of the existing buildings and provision of affordable employment spaces has a significant cost in itself).

Local Shops

- 6.112 Whilst the development is principally a housing and employment scheme in terms of the floorspace proposed, a balanced and sustainable community will include elements of retail and restaurant floorspace within the range of appropriate mixed uses.
- 6.113 The role of the A1 retail is principally an ancillary one to support the new housing and employment uses.
- 6.114 A maximum parameter of 1,000 sqm of Class A1 retail floorspace has been set within the masterplan. The illustrative layout shows 900 sqm GEA of A1 floorspace, split between The Veneer Building (360 sqm GEA) and The Assembly Building (540 sqm GEA). Such floorspace might be expected to be occupied by local convenience retailers or A1 services such as hairdressers and dry cleaners.
- 6.115 This quantity of floorspace falls below the default threshold of 2,500 sqm set out in the NPPF for which an impact assessment is required but, nonetheless, we consider the local impacts of the proposed floorspace in this section, as well as a consideration of the sequential approach.

Impact on Hayes Town Centre

- 6.116 Hayes Town Centre has approximately 31,000 sqm GEA of retail floorspace, including around 3,200 sqm (10%) vacant floorspace. The proposed floorspace at TOVF therefore represents only 3% of the existing Town Centre floorspace and is insignificant in scale.
- 6.117 The Hillingdon Convenience Goods Retail Study Update 2012 identifies that convenience provision within Hayes consists primarily of independent, specialist and/or ethnic shops. National multiples represent only 3 out of the 35 total units. The Update acknowledges that there may be a qualitative argument for provision of an additional store to provide facilities for a main food shop. However, this would need to complement rather than compete with the current specialist offer in the town.
- 6.118 The scale of retail floorspace in any one unit at The Old Vinyl Factory would not exceed 4-500 sqm GEA and this would not be sufficient to accommodate a main foodstore (for which a minimum of 1,400 sqm net would be expected).
- 6.119 Local top-up shopping and/or retail service shops would serve a localised catchment and support the new residential and office floorspace. Demand from comparison goods retailers would likely be limited due to a lack of critical mass of floorspace but specialist retailers associated with the creative employment uses across the site may be attracted to the units.

- 6.120 The units would not be of a scale to draw retailers out of the town centre where the critical mass of shops and services contributes to the strong pedestrian flow.
- 6.121 Trade is also unlikely to be diverted from the town centre as the shops will primarily serve the residents and office workers of the new wider development.
- 6.122 Given that the site is in close proximity to Hayes Town Centre (a 5 to 10 minute walk), we note that the new and refurbished office and residential floorspace will create additional local expenditure to support the shops and services within the town centre, which will be a positive impact.
- 6.123 Overall, it is clear that the proposed retail space is a small scale ancillary element to this scheme and will not have any negative impact on the town centre.

Sequential Approach

- 6.124 The sequential approach set out in the NPPF, and recently clarified in the Supreme Court Judgement *Dundee City Council Vs Tesco Stores Ltd*, is clear that sites need to be considered that are suitable for the development proposed, with the developer demonstrating flexibility in scale and format.
- 6.125 It is clear from the parameters that have been set and from the illustrative layout that any shops within TOVF are intended to provide ancillary small scale retail space to support the development proposed. By its very nature, it therefore needs to be integrated into the site. A town centre site would not allow for the 'corner shop' facility that the proposed shops are seeking to meet. In defining a 'suitable site' in this context, a location integrated into or adjacent to the development is one of the primary considerations for a site's suitability.
- 6.126 There is therefore no sequentially preferable site that is suitable for the development proposed.

Restaurants, Cafes and Other non-A1 Uses

- 6.127 The parameters establish that up to 4,000 sqm of A Class uses can be implemented as part of the masterplan (with up to only 1,000 sqm in A1 uses). The remaining floorspace would be in use as A2 (financial and professional services), A3 (restaurants and cafes), A4 (drinking establishments) and A5 (hot food takeaways).
- 6.128 Reflecting the parameter plans of up to 3,000 sqm of A2-A5 floorspace, the illustrative masterplan distributes these units across the site, with 111 sqm GEA proposed in The Powerhouse, 505 sqm GEA in The Assembly Building, 1,908 sqm GEA at ground floor level of The Picture House and 476 sqm in the Boiler House.
- 6.129 Whilst a change of use from A3/A4/A5 to A1 would normally be allowed under permitted development rights, it is acceptable for a suitable planning condition

to be imposed to remove this right, to ensure that the scale of A1 retail on the site remains ancillary and proportionate to meeting local needs.

Impact on Hayes District Centre

- 6.130 According to the most recent GOAD Plan for Hayes, there are seven restaurants in the district centre, all offering Asian cuisine, except for one which specialises in Somali cuisine.
- 6.131 There are 10 cafes, four pubs and 16 hot food takeaways. McDonalds and KFC are the only national chain operators.
- 6.132 The units in the Powerhouse and Assembly Building are small scale and, like the retail units discussed above, are designed to perform an ancillary function for the residents and office workers, such as coffee shops.
- 6.133 The more significant volume of A3 – A5 floorspace to be located in the ground floor of the Picture House will support the main use of the building as a cinema, creating a ‘leisure destination’ which is important for the commercial viability of the cinema operation.
- 6.134 The restaurants and bars located within the Picture House will predominantly attract customers who are also visiting the cinema. The national operators which regularly locate within cinema complexes tend to offer Italian, Mexican, American, French and/or British cuisine – none of which are currently available in Hayes Town Centre. As such, this will represent a new leisure investment in Hayes and will not directly compete with existing restaurants in the district centre. They will also offer the opportunity for a wider cuisine range to be available to local residents in Hayes, enhancing consumer choice, and thus have a net positive impact for the area.

Sequential Approach

- 6.135 Whilst the NPPF states that the first preference for town centre uses is to be within a town centre, it also makes clear that sites or premises have to be suitable for the development proposed. As described above, the Class A3 to A5 uses proposed are ancillary to the wider development proposed and fully integrated within this large scale regeneration scheme.
- 6.136 As such, the A3 to A5 uses, particularly those in the Powerhouse and Assembly Building, could not be disaggregated from the development and located within the town centre and still perform their ancillary function.
- 6.137 The restaurants and bars proposed in the Picture House are proposed to function alongside the new cinema complex as a single leisure destination.
- 6.138 We note that the Picture House could theoretically stand alone and therefore a sequential search for alternative sites for this building is appropriate.
- 6.139 Hayes Town Centre is tightly formed and there are no development sites that could accommodate the 2,000 sqm or so footprint required for a cinema

complex with ancillary restaurants. Extending the search to edge of centre locations also reveals no development opportunities.

- 6.140 Whilst there are some vacancies in the town centre, the overall rate is low and a certain amount of vacant space is necessary to allow for ‘churn’ of new businesses. Nonetheless, the largest vacant unit (52 Station Road) has a footprint of only 680 sqm, which is insufficient to accommodate the proposed development.
- 6.141 The latest GOAD plan identifies the former Kings Arms PH on Coldharbour Lane as being vacant; however, this building has now been demolished and is to be re-developed for residential and retail uses and is therefore not available.

Amenity

- 6.142 The matter of amenity has been closely considered through the evolution of the proposal. In a high density mixed use environment, the need to provide protection to residential amenity is supported by policies from national to local level.
- 6.143 Residential amenity, for both existing and future residents, can be considered to comprise a number of aspects:
- a standards of dwellings themselves and
 - b impact of neighbouring uses upon residential use and vice versa.
- 6.144 Each is addressed in turn.

Standards of Dwellings

- 6.145 Policy 3.8B of the London Plan and the Accessible Hillingdon SPD require that all new housing is built to Lifetime Homes standards. In addition, both documents also state that 10% of new housing must be designed to be wheelchair accessible or easily adaptable to be so.
- 6.146 The Design and Access Statement confirms that all units will indeed be compliant with Lifetime Homes standards and that 10% of the proposed units will be wheelchair accessible. The illustrative layout also demonstrates how the proposed units can be designed to meet the GLA minimum space standards for residential units, the minimum standards for play space⁵ and both the Council’s and GLA standards for private outdoor amenity space.

⁵ GLA ‘Supplementary Planning Guidance Providing for Children and Young People’s Play and Informal Recreation’

Impact upon neighbouring residents

- 6.147 A higher density residential scheme will by its nature need to carefully consider how it impacts upon - and is impacted by - adjacent uses. Factors such as privacy and overlooking are required to be carefully considered as part of the design process in line with The London Plan policy 7.6. The Design and Access Statement therefore refers to these aspects in detail.
- 6.148 In terms of overlooking/privacy, the designs have been progressively amended through pre-application discussion with LBH officers to ensure that a 21m distance is maintained between habitable rooms, addressing Saved UDP Policy BE24. The critical distances between building plots is set out within parameter plan 010. Where the 21m distance has not been fully achieved, the Design and Access Statement identifies how the illustrative scheme overcomes any concerns by way of appropriate design solutions.
- 6.149 The relationship between the proposal and the residents on the northern side of Blyth Road has been carefully considered and we note that the additional neighbouring uses are not likely to be adversely impacted upon by the proposed development. Indeed, bringing active uses to the site will assist with providing natural surveillance. Local residents and businesses will also benefit from the new uses on site and the new public spaces to be created.
- 6.150 The buildings have been carefully located to respect the existing residential properties along Blyth Road. Further, the tallest parts of the building have been located adjacent to the railway line where there is larger urban scale and less sensitivity to overlooking. Once again, the Design and Access Statement assesses these points in detail.

Impact of neighbouring uses

- 6.151 This site is already characterised by a mix of uses, namely residential, employment and the adjacent railway line. London Plan Policy 7.15 requires that development proposals should seek to reduce the impact of noise by separating new, noise sensitive development from major noise sources through the use of distance, screening and internal layout in preference to sound insulation.
- 6.152 The Noise Assessment (see chapter 10 of the ES identifies that TOVF is suitable for residential development, provided appropriate mitigation is incorporated into the detailed design. It confirms that acceptable internal noise environments can be achieved in habitable rooms, within the residential units, in accordance with the LBH SPG criteria, provided an appropriate glazing and means of ventilation is installed.
- 6.153 The ES also assesses the impact of the proposed development on air quality. It concludes that there will be no adverse effects relating to the emissions of particulate matter (PM10, PM2.5) from TOVF during both construction and operation of the scheme.

- 6.154 No₂ emissions from TOVF related traffic and the CHP (energy centre) have been found to result in negligible to slight adverse effects, however, exceedances of No₂ levels at existing receptors are expected into the future, even without the scheme. The total difference in the proposed future exceedances with and without the scheme is described as “imperceptible”.
- 6.155 Please refer to the noise and air quality assessments within the ES for further details.

Daylight, Sunlight and Overshadowing

- 6.156 Policy 7.6 of the London Plan and Policy BE20 of the UDP also require that buildings do not cause unacceptable harm to relation to overshadowing as there could be the potential for a poorly designed building to have considerable impacts upon the neighbouring residents of Blyth Road. Setting back of the tallest parts of the building to adjoining the railway to the south will minimise impact to an acceptable level (as evidenced by the extant consent).
- 6.157 A Daylight, Sunlight and Overshadowing assessment has been undertaken by GL Hearn Limited and tests the maximum parameters as set out within the proposed masterplan (see chapter 13 of the ES). The assessment concludes that the proposals would have only a negligible to minor adverse effect on the daylight and sunlight amenity received by surrounding residential properties. The assessment also explains that the inflexible application of the target values given in the BRE Report may make reaching the BRE criteria difficult in a tight, urban environment where there is unlikely to be the same expectation of daylight and sunlight amenity as in a suburban or rural environment.

Access to services and facilities

- 6.158 A further key element that allows a scheme to contribute to the amenity of the area is its ability to readily access jobs, leisure, health, education and other community facilities.
- 6.159 We note that the proposal is located close to the heart of Hayes, only approximately 250m to the west of the railway station. Within 540m (or less than 10 minutes walking distance) are a wide range of local services and facilities in and around the town centre that residents, employees and visitors will be able to access without the need to travel further considerable distances away from Hayes or the Borough.
- 6.160 Recognising that many people do not live, work and carry out their general day to day lives within Hayes itself, it is necessary for new development to have good access to public transport facilities with a main goal of reducing the need to travel by private vehicle.
- 6.161 It is shown from the accessibility to public transport facilities and the frequency at which they operate that the scheme is ideally located in an edge-of-centre location in terms of meeting planning policies at both national and local levels.

In turn, this genuinely assists in the creation of sustainable communities and providing good access to local amenities for new residents.

Heritage

- 6.162 The application site is partly located within the Botwell: Thorn EMI Conservation Area, which has been identified by English Heritage as being a conservation area ‘at risk’ and which is in ‘very bad’ condition. To the north of the site, on Blyth Road is Enterprise House, a Grade II listed building, and Jupiter House, locally listed. Within the application site, the Shipping Building, Record Store and part of the Power House are also all locally listed. In addition, LBH has also recently locally listed the Pressing Plant (predominantly for its northern façade).

Statutory Context

- 6.163 When making decisions on development affecting a listed building special regard is given to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses.
- 6.164 With respect to conservation area there is a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of land or buildings within a conservation area.

National Planning Policy

- 6.165 The NPPF describes three dimensions to sustainable development which includes an “*environmental role – contributing to protecting and enhancing our natural, built and historic environment...*” (page 2, para 7).
- 6.166 Whilst the NPPF confirms that planning decision should not impose architectural styles on a proposal, it does state that the reinforcement of local distinctiveness should be promoted (para 60). It identifies that heritage assets should be conserved in a manner appropriate to their significance so that they can be enjoyed for their contribution to the quality of life (page 6 bullet 4);
- 6.167 The key message in the NPPF related to heritage is that the significance of an historic asset (whether designated or undesignated) should be established and an assessment of the impact of the proposed development on the significance should be provided.

Hillingdon Unitary Development Plan

- 6.168 The UDP (Policy BE4) identifies that new development within or on the fringes of conservation areas will be expected to preserve or enhance the features which contribute to their special architectural and visual qualities. The policy continues to note that development should avoid the demolition or loss of such features and there is a presumption in favour of retaining buildings which make a positive contribution to the character or appearance of a conservation area.

- 6.169 With respect to development at Blyth Road, Policy PR4 of the UDP states that any proposal for development should consider the site comprehensively and optimise its employment generating potential whilst noting its designation as a Conservation Area. Policy BE8 and BE12 set out that Locally Listed Buildings should preferably remain in their historic use but than an alternative use will be permitted if it is appropriate to secure the renovation and subsequent preservation of the building. Any additions should be in keeping with other parts of the building and harmonise with their surroundings.

Impact on Designated Heritage Assets

- 6.170 The PPS5: Planning Practice Guide confirms that listed buildings and conservation areas are all designated heritage assets. The Heritage Impact Assessment (HIA) submitted with the application identifies the following designated heritage assets within or in the vicinity of the site:
- Enterprise House (Grade II listed)
 - Botwell: Thorn EMI Conservation Area
- 6.171 When considering the impact of a proposed development on the significance of a designated heritage asset, the PPS5 Practice Guide identifies that great weight should be given to the asset's conservation. Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.
- 6.172 The HIA identifies that, with the exception of the Shipping Building, the existing buildings at TOVF site are in a very poor state of repair and deteriorating further.
- 6.173 This has had a detrimental impact on the overall character and aesthetic of the buildings and conservation area. The proposed outline development will have an overall positive impact on the site; it will reuse the historic structures in a manner to halt the onset of further deterioration. This will provide a sustainable future for the conservation area as a whole, which at present is derelict and in decline. The proposals also have the potential to enhance the facades and attend to previous unsympathetic alterations to the structures.
- 6.174 With respect to the proposed demolition of buildings (Jubilee, parts of the Powerhouse and the southern section of the Pressing Plant), the HIA recognises that few original internal features remain within these buildings. The northern extent of the Pressing Plant will be retained which recognises the importance of the street-facing façade within the conservation area.
- 6.175 The HIA identifies that the overall impact of the loss of these structures is outweighed by the beneficial impact of the wider development and enhancement of the site; which will provide a much needed sustainable use and future for the other historic buildings on site.
- 6.176 The proposals have no direct impact on Enterprise House. The proposed building heights and masses set out within the parameter plans will ensure that

Enterprise House remains a predominant feature of Blyth Road and the wider enhancements to the character and appearance of the conservation area will also enhance the setting of Enterprise House.

Impact on Non-Designated Heritage Assets

6.177 With respect to non designated heritage assets the following assets have been identified within or in the vicinity of the site:

- Jupiter House

6.178 The PPS5 Practice Guide identifies that the desirability of conserving non-designated heritage assets and the contribution their setting may make to their significance is a material consideration but that individually there is less priority for non-designated assets than for designated assets (para 83).

6.179 The proposals will have no direct impact on Jupiter House. The overall enhancement of the character and appearance of the conservation area will also ensure that the setting of Jupiter House is also enhanced.

Impact on below ground heritage – archaeology

6.180 A detailed assessment of the impacts of the proposed development on archaeology is contained within Chapter 8 of the ES. This identifies that there are no records of archaeological finds at the site. The site has been heavily disturbed due to the developed nature of the site but trial trenching is proposed as a mitigation measure to determine presence/absence and degree of survival of any remains.

6.181 Taking into account the above, the overall significance of effects on archaeology is considered to be neutral and minor adverse, but if further mitigation is required the impact would be neutral.

6.182 In summary, the Environmental Statement (Chapter 8) and Heritage Impact Assessment (ES appendix 8.1) provide a comprehensive assessment of the proposed development and its impact on Enterprise House and Botwell: Thorn EMI Conservation Area, concluding that the impacts are acceptable. Indeed, a number are beneficial; the ‘at risk’ Conservation area will be enhanced by the scheme and existing vacant degraded locally listed buildings will be refurbished in full or in part). The Proposals will enhance and better reveal the significance of the asset in line with NPPF Para 137.

Sustainability

6.183 The NPPF confirms that the purpose of the planning system is to contribute to the achievement of sustainable development. It confirms that there are three dimensions to sustainable development: economic, social and environmental.

6.184 The provision of a sustainable development at TOVF site is a fundamental driving objective for the proposed masterplan and is addressed in detail throughout the planning application submission (in particular within the Design

and Access Statement and Sustainability/Energy Strategy). However, a brief review is provided below:

Economic

6.185 The masterplan will create a new campus style mixed development at the site and will facilitate a number of local economic benefits including:

- 1 Generating approximately 4,000 new jobs within TOVF site;
- 2 Providing jobs particularly in those sectors that offer the greatest potential for growth;
- 3 Including subsidised employment spaces for start-up businesses to assist in active job creation for local people; and,
- 4 Repositioning TOVF as a regional employment hub in West London.

Social

6.186 The proposals will have a number of social benefits. Up to 510 new homes will be facilitated by the new masterplan and subject to viability a proportion will include affordable housing. The new housing will assist in meeting local housing needs within Hillingdon. The proposed mix use development will create a new community and a bustling environment for living and working. It seeks to create an environment where people want to live and work.

6.187 The masterplan also includes the provision of new public spaces and streets and will provide play areas and private amenity space for occupiers. Indeed, the illustrative masterplan includes the provision of substantial areas of public spaces as compared with the existing site which contains only a private car park. People will therefore be able to enjoy access to the existing historic assets within the site, which will be secured for the future.

6.188 The sites location in close proximity to the station and Hayes Town Centre means that in addition to the facilities on site there will be easy access to other local services.

Environmental

6.189 The existing, predominantly vacant site will be regenerated and the existing natural, built and historic environment will be enhanced through the re-use of existing buildings, the creation of new high quality development and the provision of new landscaping.

6.190 The Energy Strategy, submitted as part of the application, confirms that the masterplan will be developed in accordance with requirements of the London Plan and specifically the GLA Energy Team's Guidance Note 'Guidance on Preparing Energy Statements, September 2011. It identifies a 'be lean', 'be clean', 'be green' approach.

6.191 The proposals will include:

- 1 A site wide communal energy system with capacity to serve all buildings in TOVF.
- 2 An energy centre will be established in the centre of the site in the Powerhouse;
- 3 The use of sustainable materials will be encouraged for all elements of the construction; infrastructure, building structures, building envelopes, fit out materials and the refurbishment of the existing buildings;
- 4 The residential elements of the development will meet best practice standards for water efficiency. Non domestic elements will also use low flow fixtures and fittings and will be proved through independent water meters and, where appropriate, sub meters; and,
- 5 Sustainable design standards will be integral to the proposals, including construction and operation, with the following targets set within the Sustainability Statement for the detailed scheme:
 - i Seek to achieve BREEAM 'Excellent' standard of design for new buildings;
 - ii Achieve a 25% improvement on Part L of the Building Regulations (2010);
 - iii Use high specification glazing to prevent excessive solar gains;
 - iv Use Low Carbon Consultants;
 - v All dwellings will achieve Level 4 of the Code for Sustainable Homes; and
 - vi Water management measures to reduce water consumption and to mitigate the storm water outflow from the site.

6.192 To conclude, the proposed masterplan will result in a high quality mixed used development that will provide economic, social and environmental benefits in line with the Government's aim to achieve sustainable development through the planning system.

Highway Impact

6.193 A detailed Highways Assessment is contained at appendix 8 of the ES. Overall, the assessment concludes that the transportation element of the proposed development is consistent with current planning policy and would also bring wider benefit to the area through the mitigation measures proposed.

6.194 The additional trips generated would be able to be accommodated on the transport network through the provision of Crossrail and capacity improvements at a number of local junctions

Sustainable Transport, Car and Cycle Parking

6.195 With regards to sustainable development, the NPPF recognises that transport policies have an important role to play and favours sustainable transport modes to give people a choice about how they travel (para 29). Additionally,

local planning authorities are asked to support a pattern of development which facilitates the use of sustainable modes of transport (para 30).

6.196 Hayes and Harlington railway station is located within 300 metres from the nearest boundary or approximately 600 metres from the centre of the site. There are seven regular bus services running through the town centre and/or in proximity of the railway station connecting to residential neighbourhoods, local employment centres and further afield to places such as Northolt, Heathrow, Greenford, Harrow and Hounslow.

6.197 In line with Policy 2.7C of the London Plan, the proposal makes the most of existing infrastructure. Through the preparation of a Travel Plan, the applicant will seek to encourage the use of these sustainable options (see ES appendix 9 for a copy of the Framework Travel Plan). However, whilst there is a desire to encourage sustainable movement, this needs to be balanced with the need to provide parking at a level that makes the development viable in terms of selling residential units and of letting commercial space to employers in the context of local market availability.

Cycle parking

6.198 A total of 1,085 cycle parking spaces are proposed throughout The Old Vinyl Factory site. The use of bicycles will be encouraged through the travel plan to be secured through a s106 agreement. This is an increase of approximately 23% compared with the minimum requirement set out in the London Plan (Table 6.3). A full explanation of how this has been calculated is set out within the Parking Management Framework accompanying this planning application.

6.199 Safe, secure and accessible cycle parking would be provided in the form of cycle stores within buildings (for residents and employees) and as Sheffield type stands (for visitors) distributed on streets and public spaces throughout the site.

Car Parking

6.200 Through the London Plan, the Mayor seeks a balance between the promotion of new development and an excess of car parking. As such, maximum parking standards are set out within the Plan (Policy 6.13 and Table 6.2). Similarly, the London Borough of Hillingdon Unitary Development Plan (UDP) Saved Policies (September 2007) sets out the maximum car and cycle parking standards for the Borough.

6.201 In total, the application includes some 1,640 car parking spaces. The proposed car parking levels comply with current policy and with extant planning permissions. A detailed breakdown of parking provision between different uses, alongside an assessment of provision (in view of current guidelines and extant consents) can be found in the Parking Management Framework which accompanies this planning application (see Transport Assessment contained at ES appendix 9).

6.202 The London Plan and UDP require that 10% of all parking spaces should be suitable for disabled people (London Plan Table 6.2). 167 spaces will therefore be designed to meet the mobility standards set out in Hillingdon's Parking Standards.

6.203 In accordance with the London Plan Policy 6.13D, 1 in 5 spaces will be provided with an electrical charging point (either immediate access or capability for future connection) to encourage the uptake of electric vehicles.

Car Club

6.204 It is proposed to promote a car club scheme in connection with the development (approximately 6-7 spaces). The car club spaces would be provided on-street or in easily accessible car park spaces and would be accessible to residents, workers and visitors to the development as well as members of the public from the surrounding area. This approach is in line with London Plan policy 6.13Ed which allows local authorities to promote more generous car parking standards for office developments if the proposal gives a commitment for electric and car club vehicles, bicycles and parking for disabled people above the minimum thresholds.

Motorcycle parking

6.205 Motorcycle, moped and scooter parking spaces are provided in addition to those for cars. The Borough standard is 1 motorcycle space per 20 car parking spaces. On the basis of there being approximately 1,640 car parking spaces a total of some 82 motorcycle spaces would be provided.

6.206 Such motorcycle parking would be located within or as near as possible to the specific building entrances. Employee motorcycle and cycle changing facilities would be provided in both existing retained buildings and new buildings.

Crossrail

6.207 In 2008, a strip of land to the south of the Jubilee, The Pressing Plant and The Old Vinyl Factory was designated within the Crossrail Safeguarding Area, within which the proposed Crossrail route is protected from potentially conflicting development. The London Plan defines Crossrail as the Mayor's top strategic transport priority (Policy 6.4). Beyond the site to the south, the safeguarded land continues along the railway line and also includes a strip of land between the railway line and Blyth Road. Policy 6.2 states that development proposals that do not provide adequate safeguarding for transport schemes, including Crossrail, should be refused.

6.208 Throughout the evolution of the project, the team has attempted to liaise with Crossrail to understand its aspirations for this safeguarded land. We have been advised that a decision will be made towards the end of 2012 as to whether this land will indeed be required. Notwithstanding this, the scheme has been designed fully to protect this safeguarded land and is therefore compliant with the London Plan policy.

7.0

Conclusion

- 7.1 This Planning Statement sets out the rationale for a new approach to the development of The Old Vinyl Factory site (TOVF) and has considered the key principles of the development against policies set out within the National Planning Policy Framework (NPPF) and the statutory development plan.
- 7.2 It concludes that the proposed development will enable the regeneration of the TOVF site and result in a wide range of benefits to the local area. This £200m regeneration project will be driven via an innovative approach to development that seeks to create a mixed use campus environment and build on the benefits that Crossrail will provide when it arrives in 2018, whilst also learning from the lessons of the past and the previous failed approaches. This proposal will also deliver approximately 3,700 sq m of commercial floorspace which will be made available at 70% of market rents.
- 7.3 The proposed masterplan will reinforce the regeneration of Hayes town and will do so by creating a high quality public realm that complements and enhances the heritage of the site and does not turn its back on existing routes.
- 7.4 The proposed new development will facilitate the refurbishment of the existing dilapidated buildings which are located in a conservation area 'at risk'.
- 7.5 It will create a new campus style environment containing employment/commercial floorspace that is linked to the creation of new residential development to create a new community and a bustling environment. This will secure the future of the conservation area, which will be considerably enhanced.
- 7.6 By way of comparison, the extant scheme would have delivered an unimaginative set of buildings which only recognised their setting against the heritage assets rather than embracing their proximity and the need to enhance the conservation area - rather than simply protecting it. To the west, the site would remain a sea of surface level car parking with the Cabinet Building and Record Store remaining redundant and deteriorating in condition with little prospects for re-use.
- 7.7 The proposed new design reinforces the regeneration of Hayes and does so by including high sustainability standards both in terms of improved energy efficiency standards and amenity standards, inter alia, other benefits. The provision of easily accessible on-site car parking will also enable the site to attract business occupiers and please new and existing residents of the community.
- 7.8 The proposals will provide 510 residential units (plus 132 units within the Gatefold Building) and will contribute towards the provision of affordable housing provision.

- 7.9 In addition to the provision of housing, the proposed masterplan will provide a wide package of employment and economic benefits for the local area and beyond. It will meet local and London-wide objectives for employment creation and:
- 1 Bring circa 4,000 jobs back to the TOVF site;
 - 2 Provide jobs particularly in those sectors which are presently under-represented locally and for which there are a large number of jobseekers;
 - 3 Include substantial provision of subsidised incubator employment spaces;
 - 4 Provide business floorspace and employment opportunities at a strategic location (close to a proposed Crossrail station) and Heathrow airport; and,
 - 5 Reposition TOVF as a regional employment hub, supporting new employment for local people in the southern part of the LB Hillingdon.
- 7.10 In addition to the direct investment and benefits associated with the proposed redevelopment of TOVF, the extent to which it will change the profile of Hayes will be critical in helping to attract further investment and to stimulate the attraction of additional jobs in LB Hillingdon and West London more generally. This is line with the NPPF which establishes a principle in favour of sustainable development.
- 7.11 By granting planning permission for the proposed package of applications, the Council will be enabling the progressive sensitive restoration and regeneration of TOVF site and will be promoting sustainable economic development through the provision of jobs and new homes for local people.

Appendix 1 Schedule of meetings

Date	Meeting Summary (between LB Hillingdon and Applicant)
4 July 2012	Liaison with the Council. Met with Linda Aitken, Vanessa Scott, and Matthew Duigan from LBH. Discussed viability, phasing and s106.
28 June 2012	Detailed review of masterplan - uses, no. units, 21m rule, the Cabinet Building (including attendance by Adrian Waite and James Rodger)
15 June 2012	Secure by Design, landscape update, Gatefold Servicing and Pressing Plant (including attendance by Secure by Design Officer – MET Police)
7 June 2012	Design Workshop - focus on housing mix and storey heights and design evolution
7 June 2012	Viability and phasing (including attendance by James Rodgers, Head of Planning and Marcia Gillings, LB Hillingdon Housing)
1 June 2012	Accessibility - requirements (including attendance by LB Hillingdon - Access Officer – LB Hillingdon)
29 May 2012	GLA meeting – design presentation, density, parking, energy and sustainability
24 May 2012	Design development including heights, 21m rule, play/amenity space and density (including attendance by Sarah Harper, Vanessa Scott, Matthew Duigan, Adrian Waite, Marsia Gillings and Linda Aitken – LB Hillingdon)
16 May 2012	Design Workshop - housing mix, storey heights, design evolution including works to the Cabinet Building
10 May 2012	Scheme presentation, energy & sustainability EIA Studies, drainage including SUDS, flooding, contamination and ecology (including attendance by the Environment Agency and LB Hillingdon Environmental Health)
9 May 2012	Design Workshop - Car Park reconfiguration, storey heights and building materials, Cabinet Building and urban form.
2 May 2012	Site visit (including attendance by English Heritage)
3 May 2012	Heritage Meeting - archaeology, architectural and conservation area heritage
4 May 2012	Traffic and Transportation - Street Hierarchy, Deliveries and Servicing, Parking, Highway Network Issues, Scope of the TA, Highway Agency (including attendance by LB Hillingdon, Transport Officer)
26 April 2012	Planning Delivery Agreement, outline application requirements, parameter plans and phasing (including attendance by Vanessa Scott and Matthew Duigan)
16 April 2012	Design Workshop - Application Requirements, Uses, Urban Form and Structure, Landscape

12 April 2012	PPA, EIA scoping response, design matters, amenity (including attendance by Matthew Duigan and James Roger and Linda Aitken - LB Hillingdon)
28 March 2012	Summary of CABI and GLA meetings, emerging masterplan, environmental statement
2 March 2012	Site visit with Sarah Harper (Principal Conservation and Urban Design Officer, LBH)
21 February 2012	Meeting with TfL: review of emerging masterplan, content of transport assessment (including attendance by Patricia Charleton and Gordon Adams TfL)
14 February 2012	GLA meeting – context to proposals, emerging masterplan and design thinking, traffic, transport and sustainability

Appendix 2 GLA Housing SPG data

Housing Mix Requirements

Housing - London Plan Supplementary Planning Guidance (November 2005), Mayor of London

Housing tenure	Housing tenure						All tenures	
Size	Market		Intermediate		Social			
	%		%		%		%	
1 bedroom	-	25%	-	66%	-	19%	-	32%
2/3 bedrooms	-	75%	-	-	-	39%	-	38%
4 + bedrooms	-	-	-	34%	-	42%	-	30%
Total	-	100%	-	100%	-	100%	-	100%

Source Para 11.3: London-wide net housing requirement over 15 year period. Housing - London Plan Supplementary Planning Guidance (November 2005), Mayor of London)

Housing - Draft Supplementary Planning Guidance (December 2011), Mayor of London

Housing tenure	Housing tenure						All tenures	
Size	Market		Intermediate		Social			
	%		%		%		%	
1 bedroom	56,500	39%	-		-		56,400	17%
2 bedrooms	67,800	47%	5,300	14.5%	88,400	61%	161,500	50%
3 +bedrooms	19,400	14%	31,300	85.5%	57,200	39%	107,800	33%
Total	143,600	100%	36,500*	100%	145,600	100%	325,800	100%

Source: Table 3.1 10 year pan London net housing requirements (main SHMA scenario). Housing - Draft Supplementary Planning Guidance (December 2011), Mayor of London

* Figures as stated in the draft SPG, but column actually adds up to 36,600.