

# BUILT HERITAGE STATEMENT

The Gramophone, Hayes, London Borough  
of Hillingdon

JCH01051  
The Gramophone, Hayes  
Really Local Group (RLG) Ltd  
May 2020

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# 1.0 INTRODUCTION

This Built Heritage Statement has been prepared by RPS Consulting Services Ltd on behalf of Really Local Group (RLG) Ltd in relation to the Old Pressing Plant of the former EMI record factory, Blyth Road, Hayes, London Borough of Hillingdon, henceforth referred to as 'the Site'. This assessment supports a Section 73 application relating to the revision of drawings detailing the consented cinema use of the Site (ref:59872/APP/2016/3454), referred to as the 2018 Planning Permission. The Section 73 Application relates primarily to design changes to the cinema proposal forming part of the redevelopment of the Machine Store and Old Pressing Plant site. The remainder of the proposals, comprising a residential led development, medical centre and other associated development, remains unchanged with these proposals. As such, this report assesses the potential effects of the revised proposals on the significance of the locally listed Old Pressing Plant (Apollo House) building within Site building and proximate relevant built heritage assets.

This report will present an appraisal of the relevant legislative framework and planning policy at national and local levels, with special regard to policies that relate to developments affecting the significance of nationally designated heritage assets, including listed buildings. This report will also provide an overview of the history of the Site and its surroundings, an appraisal of the Site's own significance and contribution to the significance of relevant nearby built heritage assets and an assessment of the potential impacts of the proposed development on that significance.

A plot of all known built heritage assets within 500m of the Site is given in Figure 9 (pg.13). This radius is considered to be a suitable response to the proposals. Not all built heritage assets within this 500m radius have the potential to be affected by the proposals.

In accordance with the requirements set out by Section 189 of the National Planning Policy Framework (NPPF), this report assess the significance of relevant heritage assets, including contribution made by their setting. It subsequently assesses the effects of the proposals on this significance. The level of detail provided is proportionate to each heritage asset's significance and sufficient to enable the Local Planning Authority to understand the impact of the development proposals.

This assessment is proportionate to the proposed revisions of the consented scheme and does not seek to provide a detailed history of the EMI record factory or earlier Gramophone Company.

This Built Heritage Statement should be read in conjunction with the Section 73 application submission drawings and other supporting documents.

All photos, maps and plans are for illustrative purposes only.

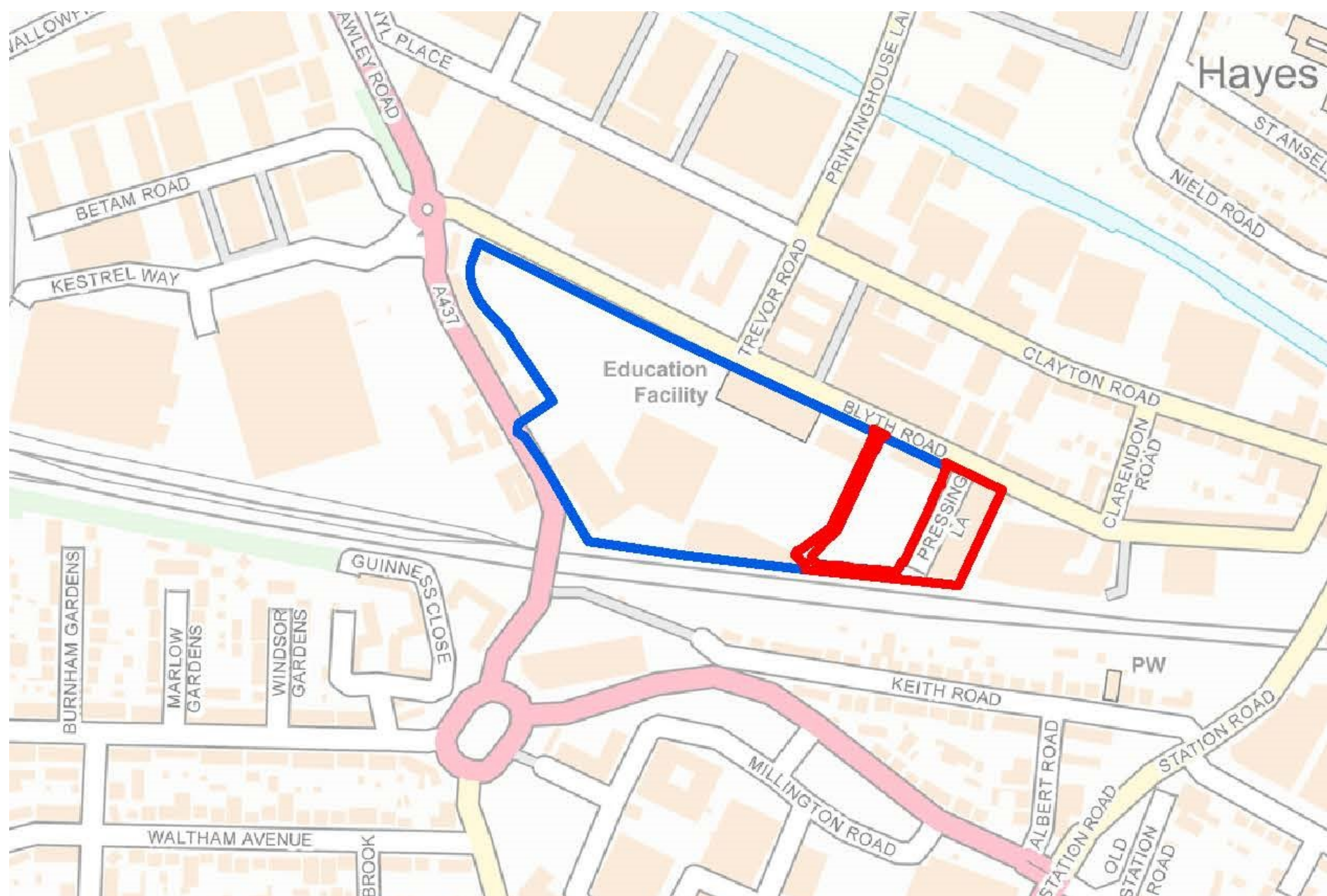


Figure 1: Site Location

The application Site is indicated by the redline only. Blue line indicates wider Old Vynyl Factory masterplan, not the subject of this report.

## 2.0 LEGISLATIVE & PLANNING POLICY FRAMEWORK

### 2.1 LEGISLATION & NATIONAL PLANNING POLICY

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The current national legislative and planning policy system identifies, through the National Planning Policy Framework (NPPF), that applicants should consider the potential impact of development upon 'heritage assets'. This term includes: designated heritage assets which possess a statutory designation (for example listed buildings and conservation areas); and non-designated heritage assets, typically compiled by Local Planning Authorities (LPAs) and incorporated into a Local List or recorded on the Historic Environment Record.

#### Legislation

Where any development may affect certain designated heritage assets, there is a legislative framework to ensure proposed works are developed and considered with due regard to their impact on the historic environment. This extends from primary legislation under the Planning (Listed Buildings and Conservation Areas) Act 1990.

The relevant legislation in this case extends from Section 66 of the 1990 Act which states that special regard must be given by the decision maker, in the exercise of planning functions, to the desirability of preserving listed buildings and their setting.

Section 69(1) of the Act requires LPAs to 'determine areas of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance' and to designate them as conservation areas. Section 69(2) requires LPAs to review and, where necessary, amend those areas 'from time to time'.

For development within a conservation area Section 72 of the Act requires the decision maker to pay 'special attention [...] to the desirability of preserving or enhancing the character or appearance of that area'. The duty to give special attention is considered commensurate with that under Section 66(1) to give special regard, meaning that the decision maker must give considerable importance and weight to any such harm in the planning balance. National Planning Policy

#### National Planning Policy Framework (Ministry of Housing, Communities and Local Government, February 2019)

The NPPF is the principal document that sets out the Government's planning policies for England and how these are expected to be applied.

It defines a heritage asset as a: 'building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest'. This includes both designated and non-designated heritage assets.

Section 16: Conserving and Enhancing the Historic Environment relates to

the conservation of heritage assets in the production of local plans and decision taking. It emphasises that heritage assets are 'an irreplaceable resource, and should be conserved in a manner appropriate to their significance'.

For proposals that have the potential to affect the significance of a heritage asset, paragraph 189 requires applicants to identify and describe the significance of any heritage assets that may be affected, including any contribution made by their significance. The level of detail provided should be proportionate to the significance of the heritage assets affected. This is supported by paragraph 190, which requires LPAs to take this assessment into account when considering applications.

Under 'Considering potential impacts' the NPPF emphasises that 'great weight' should be given to the conservation of designated heritage assets, irrespective of whether any potential impact equates to total loss, substantial harm or less than substantial harm to the significance of the heritage assets.

Where less than substantial harm is identified paragraph 196 requires this harm to be weighed against the public benefits of the proposed development.

Paragraph 197 states that where an application will affect the significance of a non-designated heritage asset, a balanced judgement is required, having regard to the scale of harm or loss and the significance of the heritage asset.

Paragraph 200 notes that local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance. It emphasises that proposals that preserve those elements of the setting that make a positive contribution to, or better reveal the significance of, the asset should be treated favourably.

Furthermore, paragraph 201 states that not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. When determining the impacts arising from the loss of a building or element that does positively contribute, consideration should be given to the relative significance of that building and the impact to the significance of the Conservation Area or World Heritage Site as a whole.



## 2.2 NATIONAL PLANNING GUIDANCE

### National Guidance

#### Planning Practice Guidance (MHCLG, 2014)

The Planning Practice Guidance (PPG) has been adopted (March 2014) in order to aid the application of the NPPF. It reiterates that conservation of heritage assets in a manner appropriate to their significance is a core planning principle.

Key elements of the guidance relate to assessing harm. It states that substantial harm is a high bar that may not arise in many cases and that while the level of harm will be at the discretion of the decision maker, generally substantial harm is a high test that will only arise where a development seriously affects a key element of an asset's special interest. It is the degree of harm, rather than the scale of development, that is to be assessed.

#### Overview: Historic Environment Good Practice Advice in Planning

The PPS5 Practice Guide was withdrawn in March 2015 and replaced with three Good Practice Advice in Planning Notes (GPAs) published by Historic England. GPA1: The Historic Environment in Local Plans provides guidance to local planning authorities to help them make well informed and effective local plans. GPA2: Managing Significance in Decision-Making includes technical advice on the repair and restoration of historic buildings and alterations to heritage assets to guide local planning authorities, owners, practitioners and other interested parties. GPA 3: The Setting of Heritage Assets replaces guidance published in 2011. These are complemented by the Historic England Advice Notes in Planning which include HEAN1: Understanding Place: Conservation Area Designation, Appraisal and Management (February 2019, 2nd Edition), HEAN2: Making Changes to Heritage Assets (February 2016), HEAN3: The Historic Environment and Site Allocations in Local Plans (October 2015), and HEAN4: Tall Buildings (December 2015).

#### GPA1: The Historic Environment in Local Plans (March 2015)

This advice note focuses on the importance of identifying heritage policies within Local Plans. The advice echoes the NPPF by stressing the importance of formulating Local Plans based on up-to-date and relevant evidence on economic, social and environmental characteristics and prospects of the area, including the historic environment.

#### GPA2: Managing Significance in Decision-Taking in the Historic Environment (March 2015)

This document provides advice on numerous ways in which decision making in the historic environment could be undertaken, emphasising that the first step for all applicants is to understand the significance of any affected heritage asset and the contribution of its setting to that significance. In line with the NPPF and PPG, the document states that early

engagement and expert advice in considering and assessing the significance of heritage assets is encouraged. The advice suggests a structured, staged approach to the assembly and analysis of relevant information:

- 1) Understand the significance of the affected assets;
- 2) Understand the impact of the proposal on that significance;
- 3) Avoid, minimise and mitigate impact in a way that meets the objectives of the NPPF;
- 4) Look for opportunities to better reveal or enhance significance;
- 5) Justify any harmful impacts in terms of the sustainable development objective of conserving significance balanced with the need for change; and
- 6) Offset negative impacts to significance by enhancing others through recording, disseminating and archiving archaeological and historical interest of the important elements of the heritage assets affected.

#### GPA3: The Setting of Heritage Assets (Second Edition; December 2017)

This advice note focuses on the management of change within the setting of heritage assets. This document replaces GPA3: The Setting of Heritage Assets (March 2017) and Seeing History in the View (English Heritage, 2011) in order to aid practitioners with the implementation of national legislation, policies and guidance relating to the setting of heritage assets found in the 1990 Act, the NPPF and PPG. The guidance is largely a continuation of the philosophy and approach of the 2011 and 2015 documents and does not present a divergence in either the definition of setting or the way in which it should be assessed.

As with the NPPF the document defines setting as 'the surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve'. Setting is also described as being a separate term to curtilage, character and context. The guidance emphasises that setting is not a heritage asset, nor a heritage designation, and that its importance lies in what it contributes to the significance of the heritage asset, or the ability to appreciate that significance. It also states that elements of setting may make a positive, negative or neutral contribution to the significance of the heritage asset.

While setting is largely a visual term, with views considered to be an important consideration in any assessment of the contribution that setting makes to the significance of an asset, and thus the way in which an asset is experienced, setting also encompasses other environmental factors including noise, vibration and odour. Historical and cultural associations may also form part of the asset's setting, which can inform or enhance the significance of a heritage asset.

This document provides guidance on practical and proportionate decision making with regards to the management of change within the setting of heritage assets. It is stated that the protection of the setting of a heritage asset need not prevent change and that decisions relating to such issues need to be based on the nature, extent and level of the significance of a heritage asset, further weighing up the potential public benefits associated with the proposals. It is further stated that changes within the setting of a heritage asset may have positive or neutral effects.

The document also states that the contribution made to the significance of heritage assets by their settings will vary depending on the nature of the heritage asset and its setting, and that different heritage assets may have different abilities to accommodate change without harming their significance. Setting should, therefore, be assessed on a case-by-case basis.

Historic England recommends using a series of detailed steps in order to assess the potential effects of a proposed development on significance of a heritage asset. The 5-step process is as follows:

- 1) Identify which heritage assets and their settings are affected;
- 2) Assess the degree to which these settings and views make a contribution to the significance of a heritage asset(s) or allow significance to be appreciated;
- 3) Assess the effects of the proposed development, whether beneficial or harmful, on the significance or on the ability to appreciate it;
- 4) Explore ways to maximise enhancement and avoid or minimise harm; and
- 5) Make and document the decision and monitor outcomes.

#### HEAN12: Statements of Heritage Significance: Analysing Significance in Heritage Assets (October 2019)

The purpose of this advice note is to provide information on how to assess the significance of a heritage asset. It also explores how this should be used as part of a staged approach to decision-making in which assessing significance precedes designing the proposal(s).

Historic England notes that the first stage in identifying the significance of a heritage asset is by understanding its form and history. This includes the historical development, an analysis of its surviving fabric and an analysis of the setting, including the contribution setting makes to the significance of a heritage asset.

To assess the significance of the heritage asset, Historic England advise to describe various interests. These follow the heritage interest identified in the NPPF and PPG and are: archaeological interest, architectural interest, artistic interest and historic interest.

## 2.2 NATIONAL PLANNING GUIDANCE

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To assess the impact to the significance of a heritage asset Historic England state that it is necessary to understand if there will be impacts to built fabric or the setting of a heritage asset and how these contribute to the heritage asset's overall significance. Where the proposal affects the setting, and related views, of a heritage asset, or assets, it is necessary to clarify the contribution of the setting to the significance of the asset, or the way that the setting allows the significance to be appreciated.

This enables an assessment of how proposals will affect significance, whether beneficial or harmful. It also states that efforts should be made to minimise harm to significance through the design process, with justification given to any residual harm.

### HEAN7: Local Heritage Listing

Historic England also provides guidance on local heritage assets. The publication Local Heritage Listing: Historic Advise Note 7 is relevant in this instance. The advice supports local authorities and communities to introduce a local list in their area or make changes to an existing list, through the preparation of selection criteria, thereby encouraging a more consistent approach to the identification and management of local heritage assets across England.

## 2.3 LOCAL PLANNING POLICY & GUIDANCE

### Adopted London Plan

The London Plan was adopted in March 2016 and is in the process of being superseded, however the following policies remain relevant in this instance;

#### POLICY 7.4 LOCAL CHARACTER

##### Strategic

- A Development should have regard to the form, function, and structure of an area, place or street and the scale, mass and orientation of surrounding buildings. It should improve an area's visual or physical connection with natural features. In areas of poor or ill-defined character, development should build on the positive elements that can contribute to establishing an enhanced character for the future function of the area.

##### Planning decisions

- B Buildings, streets and open spaces should provide a high quality design response that:
- A) has regard to the pattern and grain of the existing spaces and streets in orientation, scale, proportion and mass
  - B) contributes to a positive relationship between the urban structure and natural landscape features, including the underlying landform and topography of an area
  - C) is human in scale, ensuring buildings create a positive relationship with street level activity and people feel comfortable with their surroundings
  - D) allows existing buildings and structures that make a positive contribution to the character of a place to influence the future character of the area
  - E) is informed by the surrounding historic environment.

##### LDF preparation

- C Boroughs should consider the different characters of their areas to identify landscapes, buildings and places, including on the Blue Ribbon Network, where that character should be sustained, protected and enhanced through managed change. Characterisation studies can help in this process.

#### POLICY 7.8 HERITAGE ASSETS AND ARCHAEOLOGY

##### Strategic

- A) London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.
- B) Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

##### Planning decisions

C) Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D) Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

E) New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

##### LDF preparation

F) Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.

G) Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.

### Draft London Plan

The Greater London Authority (GLA) consulted on the Draft New London Plan between December 2017 and March 2018. The GLA further published an updated version of the draft London Plan with minor amendments in August 2018. The examination in public commenced in January 2019 and concluded in May 2019. An intend to publish London Plan, including the Mayor's suggested changes, was published in December 2019. Whilst the policies of the intend to publish London Plan have not yet been formally adopted, they do carry weight and are a material consideration in planning decisions. The relevant draft policies have been included within the sections of the assessment below. Of particular relevance to heritage assets is draft policy HC1 as follows:

#### HC1 Heritage and Conservation Growth

- A. Boroughs should, in consultation with Historic England and other relevant statutory organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to the heritage assets, landscapes and archaeology within their area.
- B. Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of

sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:

- a. setting out a clear vision that recognises and embeds the role of heritage in place-making
  - b. utilising the heritage significance of a site or area in the planning and design process
  - c. integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
  - d. delivering positive benefits that sustain and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.
  - e. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should seek to avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- C. Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- D. Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.
- E. Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.



## 2.3 LOCAL PLANNING POLICY & GUIDANCE

### Local Planning Policy

In considering any planning application for development, the planning authority will be mindful of the framework set by government policy, in this instance the NPPF, by current Development Plan Policy and by other material considerations.

The Local Plan for London Borough of Hillingdon comprises two parts;

#### Part 1: Strategic Policies (November 2012)

The Local Plan Part 1 was adopted in November 2012 comprises a spatial vision, strategic objectives, a spatial strategy, core policies and a monitoring and implementation framework with clear objectives for achieving delivery. These policies are supported by more detailed policies and allocations set out in the Local Plan Part 2.

The following strategic policies are relevant in this instance.

**SO1:** *Conserve and enhance the borough's heritage and their settings by ensuring new development, including changes to the public realm, are of high quality design, appropriate to the significance of the heritage asset, and seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.*

#### Policy HE1: Heritage

The Council will:

1. *Conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape, which includes:*

- Historic village cores, Metro-land suburbs, planned residential estates and 19th and 20th century industrial areas, including the Grand Union Canal and its features;*
- Designated heritage assets such as statutorily Listed Buildings, Conservation Areas and Scheduled Ancient Monuments;*
- Registered Parks and Gardens and historic landscapes, both natural and designed;*
- Locally recognised historic features, such as Areas of Special Local Character and Locally Listed Buildings; and*
- Archaeologically significant areas, including Archaeological Priority Zones and Areas.*

2. *Actively encourage the regeneration of heritage assets, particularly those which have been included in English Heritage's 'Heritage at Risk' register or are currently vacant.*

3. *Promote increased public awareness, understanding of and access to*

*the borough's heritage assets and wider historic environment, through Section 106 agreements and via community engagement and outreach activities.*

4. *Encourage the reuse and modification of heritage assets, where appropriate, when considering proposals to mitigate or adapt to the effects of climate change. Where negative impact on a heritage asset is identified, seek alternative approaches to achieve similar climate change mitigation outcomes without damage to the asset.*

#### Part 2: Development Management Policies (January 2020)

The Local Plan Part 2 Development Management Policies and Site Allocations and Designations were adopted as part of the borough's development plan at Full Council on 16 January 2020. The new Local Plan Part 2 replaces the Local Plan Part 2 Saved UDP Policies (2012). The council's policies map was also updated to reflect the changes to designations and allocations in the Local Plan Part 2.

The following development management policies are relevant in this instance;

#### Policy DMHB 1: Heritage Assets

A) *The Council will expect development proposals to avoid harm to the historic environment. Development that has an effect on heritage assets will only be supported where:*

- i) it sustains and enhances the significance of the heritage asset and puts them into viable uses consistent with their conservation;*
- ii) it will not lead to a loss of significance or harm to an asset, unless it can be demonstrated that it will provide public benefit that would outweigh the harm or loss, in accordance with the NPPF;*
- iii) it makes a positive contribution to the local character and distinctiveness of the area;*
- iv) any extensions or alterations are designed in sympathy, without detracting from or competing with the heritage asset;*
- v) the proposal would relate appropriately in terms of siting, style, scale, massing, height, design and materials;*
- vi) buildings and structures within the curtilage of a heritage asset, or in close proximity to it, do not compromise its setting; and*
- vii) opportunities are taken to conserve or enhance the setting, so that the significance of the asset can be appreciated more readily.*

B) *Development proposals affecting designated heritage assets need to take account of the effects of climate change and renewable energy without impacting negatively on the heritage asset. The Council may require an alternative solution which will protect the asset yet meet the sustainability objectives of the Local Plan.*

C) *The Council will seek to secure the repair and reuse of Listed Buildings and monuments and improvements to Conservation Areas on the Heritage at Risk Register, through negotiations with owners, the provision of advice and guidance, the use of appropriate legal action, and through bids for external funding for improvement works.*

#### Policy DMHB 2: Listed Buildings

A) *Applications for Listed Building Consent and planning permission to alter, extend, or change the use of a statutorily Listed Building will only be permitted if they are considered to retain its significance and value and are appropriate in terms of the fabric, historic integrity, spatial quality and layout of the building. Any additions or alterations to a Listed Building should be sympathetic in terms of scale, proportion, detailed design, materials and workmanship.*

B) *Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the building and the impact of the proposals on its significance.*

C) *The substantial harm to or total loss of significance of a statutory Listed Building will only be permitted in exceptional circumstances when the nature of the heritage asset prevents all reasonable use of the building, no viable use can be found through marketing, grant-funding or charitable or public ownership and the loss is outweighed by bringing the site back into use. In such circumstances, full archaeological recording of the building will be required.*

D) *Planning permission will not be granted for proposals which are considered detrimental to the setting of a Listed Building.*

#### Policy DMHB 3: Locally Listed Buildings

A) *There is a general presumption in favour of the retention of buildings, structures and features included in the Local List. The Council will take into account the effect of a proposal on the building's significance and the scale of any harm of loss when considering planning applications, including those for major alterations and extensions. Proposals will be permitted where they retain the significance, appearance, character or setting of a Locally Listed Building.*

B) *Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the structure and the impact of the proposals on the significance of the Locally Listed Building.*

C) *Replacement will only be considered if it can be demonstrated that the community benefits of such a proposal significantly outweigh those of retaining the Locally Listed Building.*



# 2.3 LOCAL PLANNING POLICY & GUIDANCE

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**Policy DMHB 4: Conservation Areas**

*New development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness. In order to achieve this, the Council will:*

- A) Require proposals for new development, including any signage or advertisement, to be of a high quality contextual design. Proposals should exploit opportunities to restore any lost features and/or introduce new ones that would enhance the character and appearance of the Conservation Area.*
- B) Resist the loss of buildings, historic street patterns, important views, landscape and open spaces or other features that make a positive contribution to the character or appearance of the Conservation Area; any such loss will need to be supported with a robust justification.*
- C) Proposals will be required to support the implementation of improvement actions set out in relevant Conservation Area Appraisals and Management Plans.*

3.0 ARCHITECTURAL & HISTORICAL APPRAISAL

3.1 HISTORICAL DEVELOPMENT AND MAP PROGRESSION

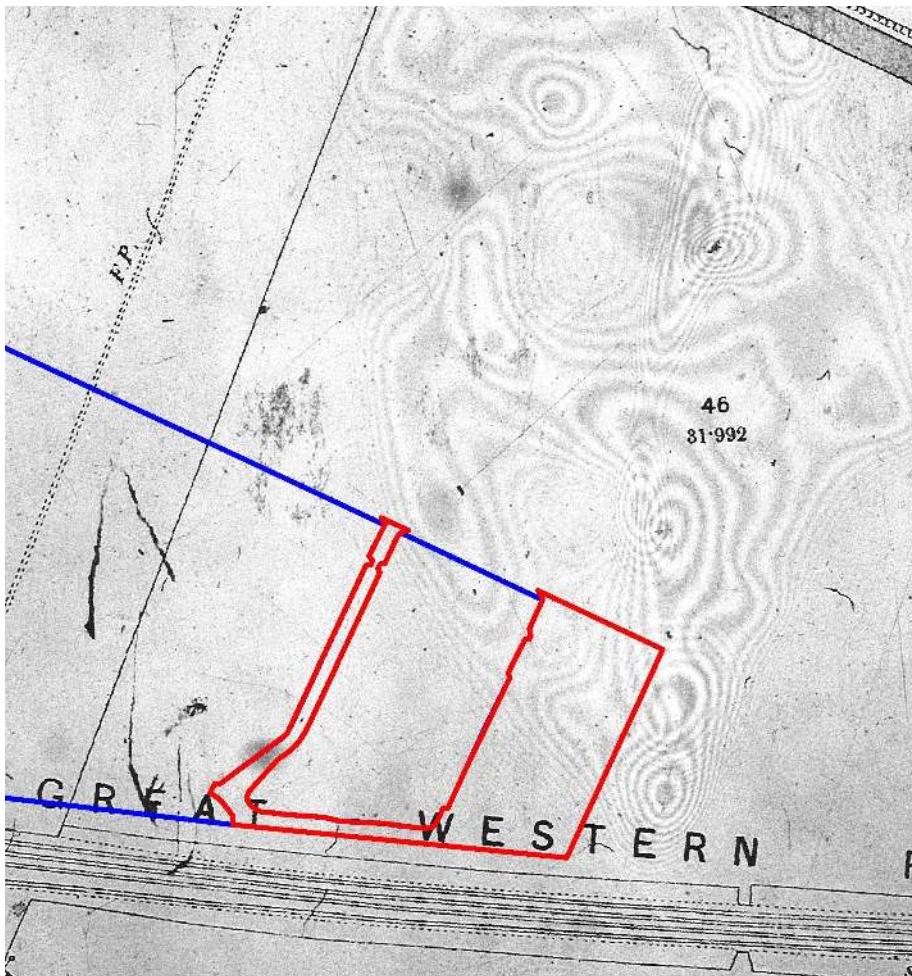


Figure 2: 1895 Ordnance Survey

Prior to the development of the Gramophone Company factory complex from 1899-1900, the Site comprised agricultural land, forming part of the rural hinterland of the village at Hayes. A rail station was opened at Hayes in c.1864 and a rail line constructed to the immediate south of the Site. In the late 19th Century the Site and wider area was largely rural in character, with the expanded built area of Greater London yet to reach Hayes. The Site and immediate vicinity was subject to rapid phases of built development in the first years of the 20th Century.

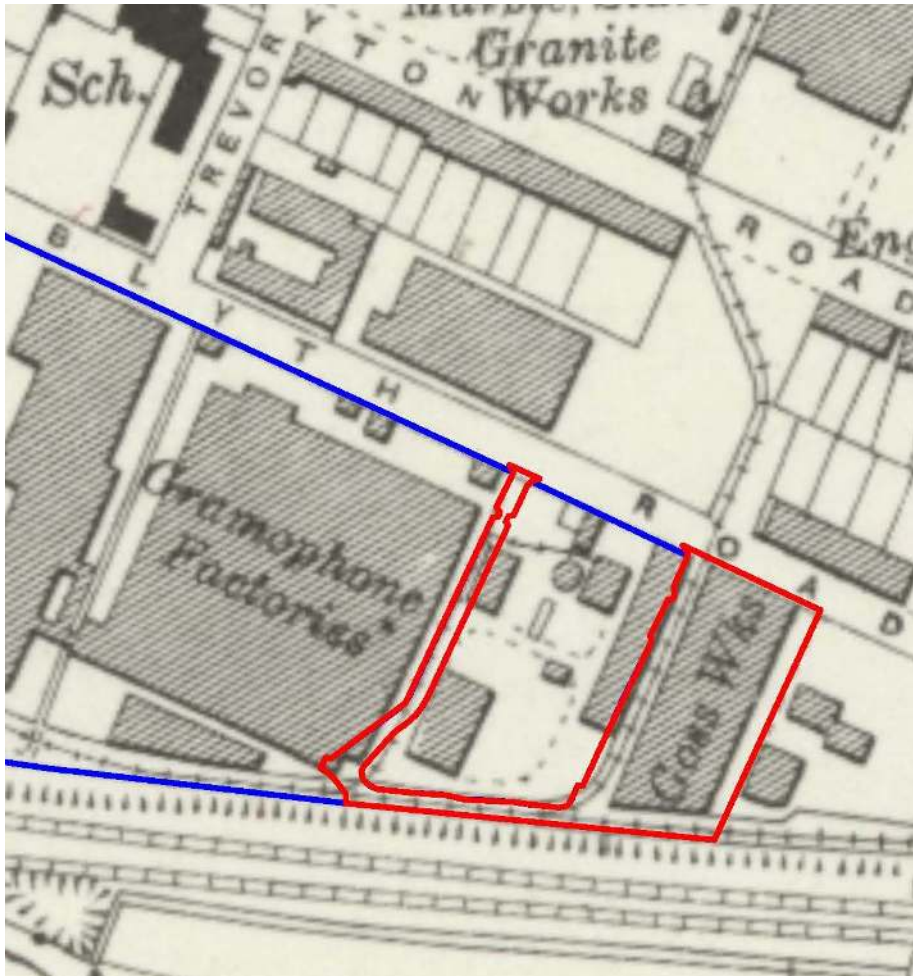


Figure 3: 1912-13 Ordnance Survey

The Old Pressing Plant, also known as Apollo House, was constructed in 1905 by the Goss Printing Company. The Goss Printing Company was based in Chicago and manufactured newspaper printing machines (Kelter, 2001). During the First World War the Site building was occupied by the National Aero Engine Company. From 1921, the Site was utilised for vehicle production by the McCurd Lorry Manufacturing Company (Sherwood, 2004). McCurd's went into liquidation in c.1927 and the Site was purchased by the adjoining Gramophone Company works and integrated to its production line as a complete machine store. A shipping department extension was added to the south of the building fronting Blyth Road in 1929, by which time the factory complex employed over seven thousand people.

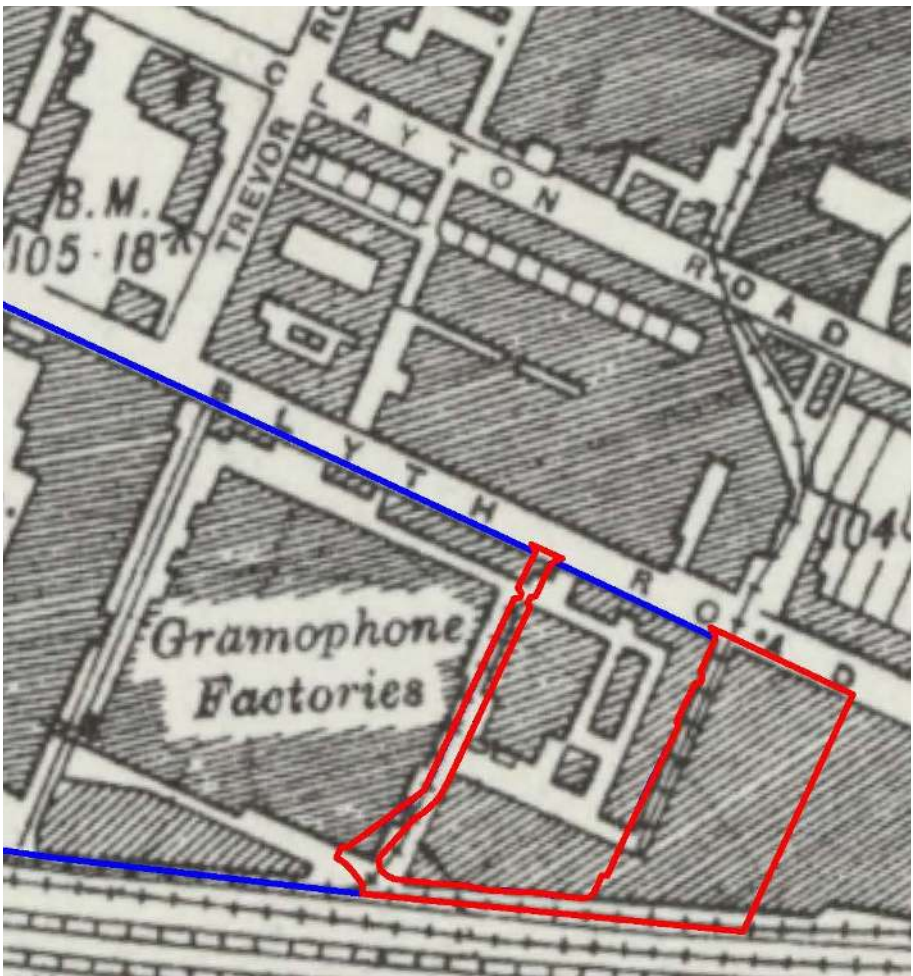


Figure 4: 1938 Ordnance Survey

From its construction in 1905, the Site has been situated within a densely developed area between the Grand Union Canal in the north and the rail line bounding the Site in the south. As with much of Britain's manufacturing base, the Site was repurposed to contribute to the 1914-1918 war effort, before reverting again to consumer focused production. The varied use of the building between 1914 and the late 1920's will have necessitated the replacement and alteration of the building's internal layout and embedded machine tools. Such alteration and periodic redevelopment, driven by economic demand and technological change, is common across the vicinity of the Site.

The 1938 OS map illustrates the southern extension to the Site building in addition to other immediately adjoining built development to the east.

During the Second World War the Site and wider Gramophone Company factory complex was again given over to war production and manufactured radio receivers.



### 3.1 HISTORICAL DEVELOPMENT AND MAP PROGRESSION

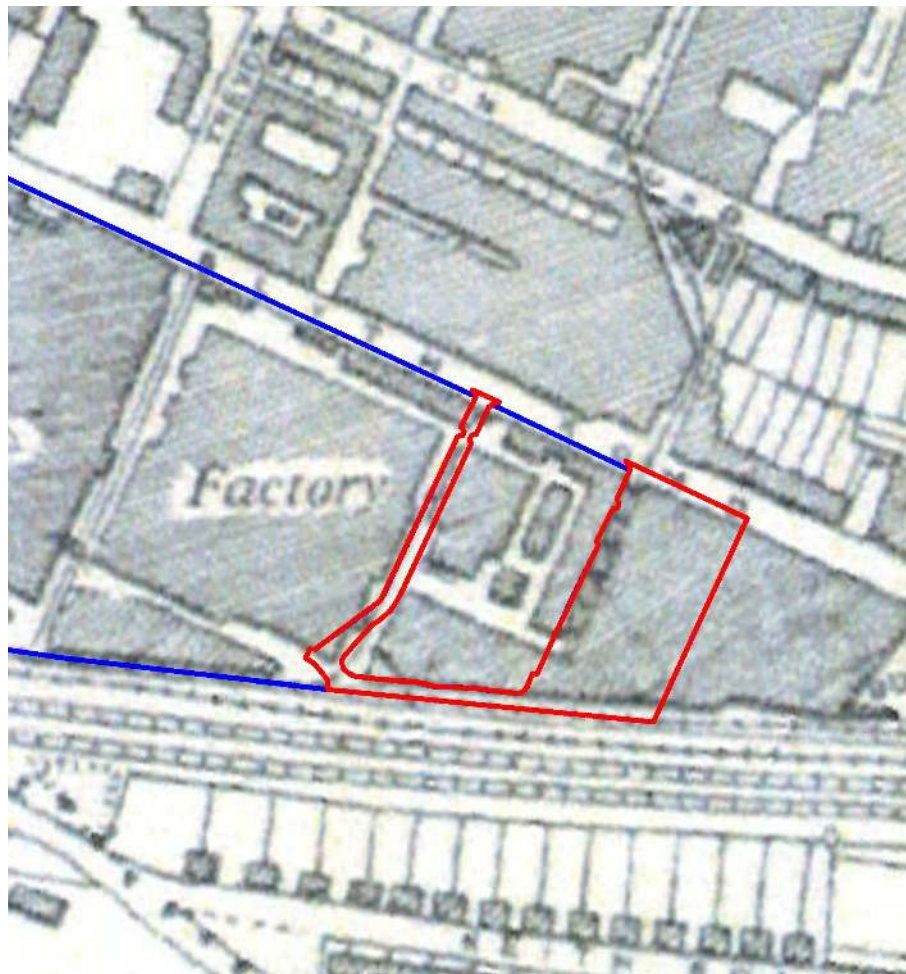


Figure 5: 1960 Ordnance Survey

In 1952 the factory complex of which the Site is a part, now known as EMI, began manufacturing 'microgroove' records in vinyl, with production peaking in the 1960's. It was in this period that the Site building was converted to and operated as a vinyl pressing plant. Production across the EMI complex changed again in the 1970's when record pressing operations moved to another location (still in Hayes) and the Blyth Road complex was turned over to electronics research and production.

Parts of the Blyth Road EMI complex began to fall out of use in the 1980's as changes in technology and wider decline of British manufacturing rendered the factory increasingly obsolete. The Site itself was emptied at this time and became increasingly deteriorated through a lack of use and maintenance.



Figure 6: 1999 Aerial Photograph (Google Earth Image, accessed May 2020)

By the last years of the 20th Century, large parts of the former EMI factory had been demolished and cleared for redevelopment. The 1999 aerial photograph shows that the Site retained its 1929 shipping department annexe to the south west at this time. Areas of redevelopment are also apparent in the vicinity of the Site by the change in plan form of local built forms compared to the 1960 OS map. Though still an essentially commercial-industrial area, with large works buildings remaining in operation to the north and north west of the Site, new development has included a notable residential element.



Figure 7: 2019 Aerial Photograph (Google Earth Image, accessed May 2020)

The 2019 aerial photograph shows the partial redevelopment of the wider EMI site. New residential based development has been constructed to the immediate west of the Pressing Plant. There has also been a phase of demolition and redevelopment to the immediate east of the Site.

Within the Site the southern part of the building (aka the Machine Store) has been demolished and is under redevelopment, leaving only the core of the 1905 structure fronting Blyth Road.



# 4.0 ASSESSMENT OF SIGNIFICANCE

## 4.1 SITE ASSESSMENT

### Site Assessment: Old Pressing Plant

The Old Pressing Plant (Apollo House) was not originally constructed as part of the Gramophone and Typewriter Company factory, but was operated as part of an the Goss printing company until the late 1920's. The Old Pressing Plant building has undergone phases of extension and internal alteration throughout its history, reflecting the varying production aims of the wider EMI factory complex. The building derives its name from the vinyl record production undertaken from the late 1950's to 1980's but prior to this was also known as 'Apollo House'. The building has been vacant for a number of years, falling into disrepair but remaining a highly legible element of the industrial history of Blyth Road and a major feature of the street scene.

The north elevation is constructed over three storeys in London stock or buff brick with over vitrified specials in decorative patterns. The north elevation of the building is embellished in a typically early 20th Century industrial style to present a sense of substantive construction, without the expense of intricate design or extensive decoration. The southern elevation has similar characteristics, though these are less pronounced. The north western and north elevation of the building contains the greatest extent of historic fabric, with the larger part of the building having been subject to a number of unsympathetic alterations.

Internally, the north end of the Old Pressing Plant retains some of the offices dating from 1905. These are identified by their timber panelling and ceilings. Elsewhere, the interior of the building has suffered poorly executed refurbishment and more recently, dereliction, resulting in damage.

Recent assessments of the building have been limited to external observation due to the risk of injury arising from the buildings poor structural condition.

### Significance

The Old Pressing Plant (Apollo House) is included on the London Borough of Hillingdon's local list of built heritage assets (ref.297). In terms of the criteria for local listing, prior to the demolition of the building's southern end, the building scored 6 of a possible 12 (i.e. very much at the lower end for inclusion on the local list). This score breaks down as follows:

1 (of a possible 3) for Authenticity ((c) *Some features retained*);

2 (of a possible 3) for Architectural Interest ((d) *an example of a style of building that is unique to the local area or a good surviving example of an historic architectural style*);

1 (of a possible 3) for Townscape Interest ((g) *good examples of town planning layout; or notable buildings, or structures on important routes into the area, or key landmark buildings or features, which create a vista or contribute to the skyline*); and

1 (of a possible 3) for Historic Interest ((h) *strong community or socio-economic development significance, such as schools, institutions or an important part of the Borough's industrial and Military history*).

In terms of architectural interest, the surviving historic fabric of the Old Pressing Plant is not of unusual material, design or craftsmanship quality. Because of later alterations, this interest is derived almost exclusively from its Blyth Road frontage. The remainder of the 1905 structure therefore can be said to have a minimal level of architectural interest, derived primarily from its evidential value for broad trends of early 20th Century warehouse construction practices. The Blyth Road frontage positively contributes to the character of Blyth Road as a historic industrial area. In addition the Old Pressing Plant has a group value with the other surviving EMI buildings that raises its significance beyond its intrinsic architectural merit. Indeed, taken collectively with other surviving elements of the EMI factory complex, the Old Pressing Plant can be said to contribute to the historic interest of the surviving group of historic former EMI buildings on Blyth Road.

The Old Pressing Plant thus derives its significance principally from its historic associations, which are multi-faceted. A low degree of historic interest lies with its origins as part of an international printing company, headquartered in Chicago and its use during the First World War in the emerging aircraft industry. No evidence now remains of these earlier uses. Of more importance is the historic interest derived from the Old Pressing Plant's role in the operation of the EMI factory. EMI evolved from its parent Gramophone and Typewriter Company to become a major production centre for records by many popular musicians in the mid-20th Century. The 'His Masters Voice' and 'HMV' Brands of EMI, together with the recording and production of records at the factory are part of the wider history of the UK music industry in the mid-late 20th Century. This industry leading historic role is sharply focused in the factory's local role as a major employer for much of the 20th Century. This interest is currently intangible, as the historic fabric itself retains no physical evidence of the record-pressing process or of its functional relationship with the other former EMI buildings.

### Setting

The remaining structure of the Old Pressing Plant fronts the south side of Blyth Road and occupies only the north end of a plot that extends to the railway. The part of the Site to the south of the building is undergoing redevelopment, with the southern part of the Old Pressing Plant (known as the Machine Store having been demolished and is in course of replacement by two tall blocks containing 81 residential units, health centre and bar. The railway pre-dates the Old Pressing Plant and the built development of the immediate vicinity. To the south of the railway is an area of earlier 20th Century residential development. To the immediate east of the Site is a 21st Century mixed residential and commercial development (Gatefold Building) occupying a plot formerly containing part of the EMI factory. On

the north side of Blyth Road opposite the Old Pressing Plant is a terrace of early 20th Century workers' housing, constructed to serve the local manufacturing businesses. To the immediate north west of the Old Pressing Plant is the Grade II Enterprise House (NHLE ref.1244861). To the immediate west of the Old Pressing Plant is a mix of late 20th and 21st Century built development, forming part of the wider TOVF redevelopment, among which lie the major surviving elements of the EMI factory complex, comprising, the Old Power Plant, Neptune House, the Thorn/EMI building, the HMV/EMI building and Jupiter House.

Surrounding the building's immediate setting, formed of the redeveloped and surviving parts of the former EMI complex, are adjoining manufacturing companies in various ownership and use. The wider setting of the Old Pressing Plant is formed of the extended urban area of Hayes and comprises dense, extensive areas of commercial and residential built development, including Hayes town centre, of predominantly mid-20th Century and later date.

### Contribution of Setting to Significance

The Old Pressing Plant structure has a historical and functional relationship to the surviving elements of the EMI factory complex. The significance of the Old Pressing Plant has been identified as resting primarily on the collective historical interest of the former EMI factory buildings and the role of the Site in the historic manufacturing character of Blyth Road, recognised by the designation of the Botwell: Thorn EMI Conservation Area. Despite the extensive modern development that has taken place since the closure of the former EMI site, the surviving former EMI Factory buildings within the immediate setting of the Old Pressing Plant make a very high contribution to its significance.

The wider built area is generally of lower architectural quality and does not share the very distinct historical and functional relationship of the former EMI buildings with the Site. The modern elements of the immediate and wider setting are not considered to make any contribution to the significance of the Apollo House Old Pressing Plant.



Figure 8: North elevation, Old Pressing Plant (Source: Heritage Impact Assessment: The Old Vinyl Factory Pressing Plant, September 2016, Purcell)

## 4.2 IDENTIFICATION OF BUILT HERITAGE ASSETS

### Identification of Built Heritage Assets

The Site contains a locally listed building, the Old Pressing Plant (Apollo House) of the former EMI factory. In the immediate vicinity of the Site, several other locally and statutorily listed buildings related to the EMI works survive and are within the conservation area (Botwell: Thorn EMI Conservation Area) by the London Borough of Hillingdon. Statutory List descriptions are given in Appendix A. Local List Entries are given in Appendix B.

The proposed development represents an alteration of the built fabric of the locally listed Old Pressing Plant and has the potential to alter the significance of the conservation area through changes to its character and appearance. The proposals have the potential to alter the significance of proximate surviving EMI buildings through changes to their setting, particularly as the Site was formerly part of this factory complex.

The following built heritage assets are therefore relevant to this assessment;

- Enterprise House, Grade II, NHLE ref.1244861;
- Thorn/EMI Building (Locally Listed);
- HMV/EMI Building (Locally Listed);
- Former HMV Offices/Jupiter House (Locally Listed)
- Neptune House (Locally Listed)

All other built heritage assets within a 500m radius of the Site are separated from the Site by considerable intervening distance and built development (Fig.9). Only the built heritage assets listed above are carried forward for further assessment.

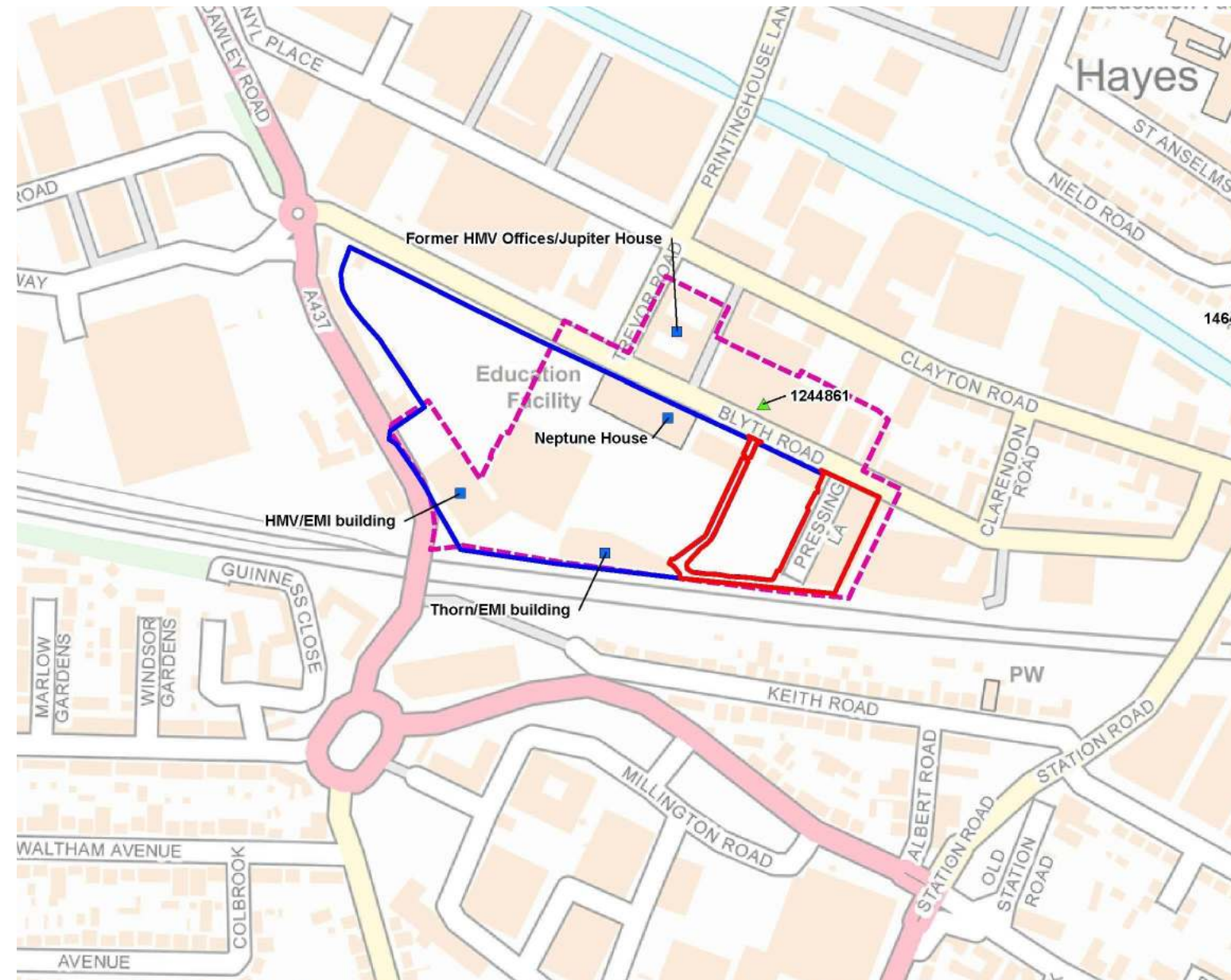


Figure 9: Plans showing the Site in relation to the Grade II Enterprise House (1244861), nearby locally-listed buildings and the boundary of the Botwell: Thorn EMI Conservation Area



## 4.3 STATUTORILY LISTED BUILDINGS: ENTERPRISE BUILDING

### Enterprise House, Grade II

Enterprise House (Grade II, NHLE ref.1244861) was listed in October 1997 and is part of the former factory for EMI/His Master's Voice. The building was constructed in 1912, by the Trussed Concrete Steel Company, as a reinforced concrete frame expressing Kahn system reinforcement posts and beams (patented in Detroit, USA in 1903). Around the frame is a painted brick infill with square light steel framed windows. The building is an irregular E-shaped plan, with offset centre.

### Significance

The building is among the earliest surviving examples of reinforced concrete and steel construction in England. Enterprise House's chief designer, Sir E. Owen Williams, is a prominent engineer-architect of the early 20th Century and is widely known for his work in constructing commercial buildings for Boots Pure Drug Company, the Daily Express and British Overseas Airways Corporation. The Enterprise Building on Blyth Road is William's earliest known work.

The building has a high degree of architectural and historic interest as a largely intact example of the early steel and concrete construction form that would come to widely influence both commercial and residential buildings in the 20th Century. In the early 20th Century, the building would have represented some of the most advanced factory building design and construction practices and therefore, in functional terms, represents the prominence of the Gramophone factory complex as a major commercial operation. Additionally, in aesthetic and character terms Enterprise House contrasts somewhat with the more traditionally constructed EMI buildings, such as the Old Pressing Plant, which though less than ten years older, is constructed in a well established pattern of 19th Century origin.

### Setting

Enterprise House is located among the surviving and redeveloped elements of the former EMI factory. Enterprise House is positioned on the north side of Blyth Road and together with the other former EMI buildings, forms a group of early 20th Century factory buildings that have a highly legible functional and historic relationship within an industrial estate of generally later 20th Century construction. The early 20th Century commercial character of part of Blyth Road is highly appreciable and recognised as the Botwell: Thorn, EMI Conservation Area. The densely developed nature of the area around Blyth Road and clear legibility of the functional and historic relationship of the EMI buildings gives the immediate setting of Enterprise House an enclosed, cohesive character with limited long views to the wider area other than where recent demolition has opened up formerly developed plots.

The wider setting of Enterprise House is formed of the extended built area of Hayes. The surrounding built area is of mixed residential and commercial use and of generally of no architectural or historic interest. The appreciation of the wider area is limited by the densely developed character of Blyth Road, notwithstanding gaps in the building line formed of vacant spaces following demolition of other parts of the EMI complex.

### Contribution of the Setting to Significance

The surviving elements of the EMI factory complex have a clearly legible historical and functional relationship with Enterprise House. These buildings, which are included on the London Borough of Hillingdon's local list of non-designated built heritage assets and collectively give the Botwell: Thorn EMI Conservation Area its distinct early 20th Century industrial character. The immediate setting of Enterprise House, encompassed by the conservation area is considered to make a high contribution to the significance of the building through the group value of the surviving EMI buildings, despite the extent of later redevelopment in the immediate vicinity.

The wider, largely unappreciable, built setting of Enterprise House is not considered to make any contribution to the distinct architectural or historic interest of the building or contribute to the appreciation of its significance within the enclosed Botwell: Thorn EMI Conservation Area.

### Contribution of the Site to significance

The Site contains the Old Pressing Plant Building (Apollo House). The Old Pressing Plant represents an older, more established style of commercial warehouse construction than the then innovative steel and concrete Enterprise House. The two buildings do however have a highly legible and well documented historical and functional association. The surviving historic elements of the Old Pressing Plant are considered to make a high contribution to the appreciation of the intrinsic architectural and historic interest of this listed building as part of the EMI group, notwithstanding the intervening more recent residential development.



Figure 10: Enterprise House, looking south east on Blyth Road towards Site (Google Maps 2008 Image, accessed May 2020).



## 4.4 LOCALLY LISTED BUILDINGS: EMI FACTORY GROUP

As a result of their historical and functional relationship, the locally listed buildings of the EMI factory located outside of the Site are assessed as a group. This group of non-designated built heritage assets are located within the Botwell: Thorn EMI Conservation Area on Blyth Road and include;

- **The Former HMV Offices/Jupiter House (Hillingdon Local List ref.069):** This was the headquarters building and recording studio of the HMV (later EMI) factory. The building is constructed in red brick over three storeys and stucco quoins with two gables fronting onto Blyth Road. All the original sashes have now been replaced with UPVC (Fig.11).
- **The HMV/EMI building (Hillingdon Local List ref.070):** This building was designed by Wallis Gilbert & Partners and exhibits Egyptian type details with battered walls in white render. The building is five storeys tall with an intended massive appearance (Fig.12).
- **The Thorn/EMI building (Hillingdon Local List ref.071):** An Inter-war factory also designed by Wallis Gilbert & Partners. The building has a long symmetrical elevation facing onto the railway. This building is in poor condition but is a key landmark on the railway line (Fig.13).
- **Neptune House (Hillingdon Local List ref.072):** This is the earliest surviving factory building within the former EMI complex, constructed from 1899. The building is white rendered and later used as a boiler house. The building is notable for its tall chimney and decorated water tower to the rear (Fig.14). This building is currently undergoing substantial alteration for new uses.

### Significance

Historic England's *Local Heritage Listing: Historic Advice Note 7* identifies that buildings unsuitable for inclusion in the national list may, as a result of their contribution to local character, distinctiveness or individual architectural merit, be suitable for inclusion in a local list used to inform planning decisions affecting the historic environment.

The group of Listed and locally listed former EMI buildings has historical interest as the site was a prominent commercial enterprise for much of the 20th Century. The buildings are part of the history of the music industry in Britain and part was the local area's historic social and economic development. The later EMI buildings also have a degree of architectural interest for understanding the construction and design methods of 20th Century factory buildings. Both the architectural and historic interest of the buildings is enhanced by their historical and functional relationship to each other.



Figure 11: Jupiter House (London Borough of Hillingdon Local List Entry Image, accessed May 2020)



Figure 12: HMV/EMI building (London Borough of Hillingdon Local List Entry Image, accessed May 2020)



Figure 13: Thorn EMI Building from south of rail line (London Borough of Hillingdon Local List Entry Image, accessed May 2020)



Figure 14: Neptune House (London Borough of Hillingdon Local List Entry Image, accessed May 2020)

## 4.4 LOCALLY LISTED BUILDINGS: EMI FACTORY GROUP

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### Setting

The group of Listed and locally listed former EMI buildings comprising the Botwell: Thorn EMI Conservation Area is situated on Blyth Road and Dawley Road. The group lies within a much redeveloped area of mixed industrial units of varying size and layout that gives way to terraced housing in the east. Despite much modern residential infill development both within the conservation area and outside of it, the immediate setting of the former EMI buildings retains has a commercial-industrial character that is tightly enclosed by the scale and massing of built form. In the north this immediate setting is bound by the Grand Union Canal and in the south by a railway line.

Beyond the immediate setting of the EMI group is the wider built area of Hillingdon, a densely developed urban area of mixed commercial and residential spaces of predominantly 20th Century date.

### Contribution of Setting to Significance

Despite much modern infill development, the EMI group of Listed and locally listed buildings lies within an area that still retains some commercial-industrial character, especially to the north and west of the group. The continuation of limited commercial activity in the immediate vicinity of the EMI group enhances the appreciation of them as a functionally and historically related complex of early 20th Century factory buildings and part of the wider area's economic and social history. This is considered to represent a moderate contribution to their significance, as derived primarily from the group's architectural and historic interest.

### Contribution of the Site to Significance

Despite the Old Pressing Plant having been built for other purposes and despite the loss of its southern end, it remains part of a group of former EMI factory buildings. The Old Pressing Plant has a historic and functional relationship with the other surviving EMI buildings and as such is considered to contribute to their significance. Though much altered, the north elevation of the Old Pressing Plant remains a key part of the Blyth Road street scene.



## 4.5 CONSERVATION AREAS: BOTWELL:THORN/EMI

### Botwell: Thorn EMI Conservation Area

The London Borough of Hillingdon has not produced a character appraisal or management plan for the Botwell: Thorn EMI Conservation Area. This conservation area was designated in June of 1988 and has not been subsequently revised.

The conservation area encompasses the former EMI/His Masters Voice Gramophone and later vinyl record factory. Four of the surviving factory buildings are included on the London Borough of Hillingdon's Local List of non-designated built heritage assets and one, Enterprise House, is Grade II listed.

### Significance

The conservation area comprises the site of a 20th Century factory complex, of which several buildings of early 20th Century date survive. One of these buildings, Enterprise House, has a high degree of intrinsic architectural and historic interest as a very early example of steel and concrete construction, recognised in its listing at Grade II. The four locally listed buildings, assessed in the preceding section, are good examples of early 20th Century manufacturing buildings of a design and material construction typical for the period. The locally listed buildings survive in varying condition and lack the special architectural and historic interest that would support their inclusion on the National Heritage List for England. These buildings have a clearly legible historic and functional relationship with each other that enhances their significance beyond their individual architectural and historic interest.

The character and appearance of the conservation area is derived from the way in which the surviving EMI buildings are experienced as a legible historic factory complex. This experience of the conservation area as a historic industrial space has a specific historical interest for the building's collective role in the British music industry as it evolved from gramophone production to mass manufacture of vinyl records and broader association with trends in popular music. The surviving buildings have local-historical interest because of the employment formerly provided.

### Setting

The conservation area lies south of the Grand Union Canal and Clayton Road, which retain the commercial character that was established in the area from the first phases of local built development in the late 19th and early 20th Century. Though retaining a commercial-manufacturing-industrial character, the area immediately north of the conservation area has been subject to extensive redevelopment in the late 20th and early 21st Century.

To the immediate east of the conservation area is the eastern section of Blyth Road and Clarendon Road. This part of the conservation area's setting has a number of smaller works buildings but is characterised

primarily by terraced housing of early-mid 20th Century date. This part of the conservation area's setting is generally lower in height than the large manufacturing buildings within the conservation area and further to the north west, but includes taller recently constructed residential blocks on the south side of Blyth Road.

In the south, the conservation area is bound by a rail line that predates the local built development. Beyond the rail line are further areas of mixed terraced housing and works buildings of predominantly mid-20th Century date with substantial areas of more recent re-development.

To the immediate west of the conservation area is a less densely developed area, following phases of demolition, characterised by more well spaced, larger commercial buildings or warehouses.

The setting of the conservation area is entirely urban with close set mixed areas of small terraced housing and complexes of commercial building ranging in size from small mid-20th Century workshops to expansive modern warehouses and multi-storey residential blocks.

### Contribution of Setting to Significance

The conservation area derives its significance from the group value of the surviving EMI buildings and their historic manufacturing complex character and appearance. The setting of the conservation area is, as it has been historically, primarily defined by commercial-industrial buildings. The immediate setting of the conservation area has been subject to extensive redevelopment but does retain elements, such as the terraced workers housing that is broadly contemporaneous to the EMI buildings.

It is considered that as a result of the ongoing character of the immediate setting of the conservation area as an industrial area, it makes a positive contribution to the appreciation of the EMI buildings as a coherent, early phase of local industrial development. This contribution to the appreciation of the conservation areas significance is however distinct from the intrinsic architectural and historic interest of the surviving EMI buildings and their group value.

### Contribution of the Site to Significance

The Site includes the locally listed Old Pressing Plant building that forms part of the EMI factory group and lies within the Thorn EMI Conservation Area. Despite the poor appearance of the Old Pressing Plant's east, west and south elevations and the denuded and altered interior, the Site contributes to the character and appearance of the conservation area through the intactness of the Old Pressing Plant's north elevation, fronting Blyth Road. The Old Pressing Plant's north elevation expresses the typical style and materials of an early 20th Century warehouse building and has a high degree of historic interest as a key element of the wider former EMI factory.

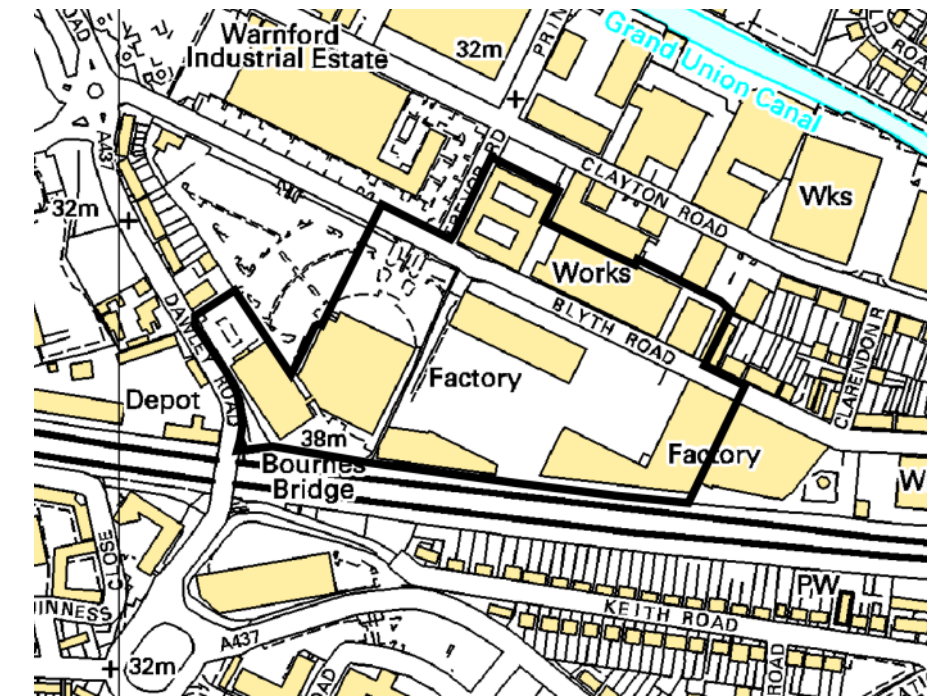


Figure 14: Botwell: Thorn EMI Conservation Area Map, London Borough of Hillingdon



## 5.0 PROPOSALS & ASSESSMENT OF IMPACT

### 5.1 DEVELOPMENT PROPOSALS AND ASSESSMENT OF IMPACT

The conversion of the Old Pressing Plant within the Site to cinema use was approved, together with associated works by the London Borough of Hillingdon in January 2018 (ref.59872/APP/2016/3454). Structural investigation and the continuing deterioration of the building has rendered much of the structure unsafe and unviable for future use.

The proposals relevant to this application are a previously approved scheme which sets the precedent for sole retention of the north and western elevations. The below revisions primarily relate to the alteration of the approved roof treatment.

Several revisions to the approved proposals are being submitted as part of a Section 73 application. The changes include:

- Redesign of the external cladding to create the silhouette of a part flat and part monopitch roof;
- Increase of floorspace area;
- Increase of number of cinema screens from 3 up to 4;
- Provision of 2no. recording studios, mixing labs and a listening cafe/ lounge at second floor level;
- Internal re-arrangements to enable ground floor glazing and active frontages to be introduced around the extents of the development;
- Provision of permanent artefacts and / or displays to interpret the historical context of the building and wider historic former EMI factory buildings;
- Provision of energy-saving infrastructure to enhance the development's sustainability credentials.

The changes require a change to the approved roofscape to provide accommodation for the necessary plant to ensure the appropriate operation of the cinema and other ancillary uses.

The scheme will continue to deliver a restaurant/bar, and community meeting space, and it will seek to utilise the same 15 no. car parking spaces that are to be shared with non-residential uses at the Machine Store, as approved by the same full planning permission as the Old Pressing Plant (ref.59872/APP/2016/3454).

The proposals have been designed specifically to integrate the existing retained facades of the former Old Pressing Plant (Apollo House).

The proposals are illustrated in Figures 15 to 21 on the following pages.

#### Assessment of Impact

The proposed development seeks to retain the built fabric that contributes most to the low architectural interest of the Old Pressing Plant. Retention of the key northern elevation to Blyth Road and structurally sound elements of the western elevation will preserve the contribution of the building to the character and appearance of the Botwell/Thorn EMI Conservation Area and protect the legibility of the EMI group's functional and historic relationship. The Old Pressing Plant is a key element in the street scene of Blyth Road and this consideration has been embedded to the proposals.

The proposals were favourably received by the Local Planning Authority during the pre-application advice process (59872/PRC/2020/45), who noted the design and social merits of the scheme.

The proposals represent a design approach that will alter the way in which the significance of the building is appreciated. The building's historic fabric will in effect be a feature set against a modern building with very different use to the original manufacturing warehouse. Poorly executed façade retention is generally regarded as having the potential to harm the significance of a historic building, as a result of reducing the retained fabric to decorative or aesthetic motif and the concurrent loss of the legibility and therefore the understanding, of historic function and use. In this instance the proposals are considered to be the most appropriate means installing a long term viable use to the Site that has embedded all significant historic fabric into its design rationale, deriving inspiration directly from the building's historic function in the EMI works.

Though the proposals are based on the introduction of new built form within the plot of the Old Pressing Plant, the proposed aesthetic is considered to be a high quality, innovative response to a Site-specific historical context that will help secure the successful regeneration of the EMI site. The proposal for a permanent historical archive exhibition within the proposed scheme is also considered relevant and beneficial to understanding the social and historical context of the former EMI factory complex.

While the proposals secure the most significant fabric (north and west elevations) of the Old Pressing Plant, the redevelopment of the Site entails the loss of all surviving internal structural fabric. The surviving internal fabric has generally been subject to poor quality repair and refurbishment and retains no evidence of the building's historic uses. This fabric makes no contribution to the significance of the nearby Listed or locally listed building, or the group value of the former EMI buildings, or to character or appearance of the Botwell: Thorn EMI Conservation Area. The proposals therefore are considered to preserve the contribution of the Old Pressing Plant to the group value of the surviving EMI buildings and the character and appearance of the Botwell: Thorn EMI Conservation Area, through retention of its key historic fabric and securing the future of this fabric

through a viable new use.

The manner in which the proposed development seeks to interpret the Site's recording heritage to the wider public is a substantial benefit.

The spectrum of substantial and less than substantial harm does not apply to the assessment of non-designated built heritage assets and as such, in accordance with paragraph 197 a 'balanced judgement' is required in weighing the loss of the building's poor quality internal fabric and layout against the public benefits of the proposals and the securing of a long term viable use for the building's key Blyth Road elevations.

5.1 DEVELOPMENT PROPOSALS AND ASSESSMENT OF IMPACT

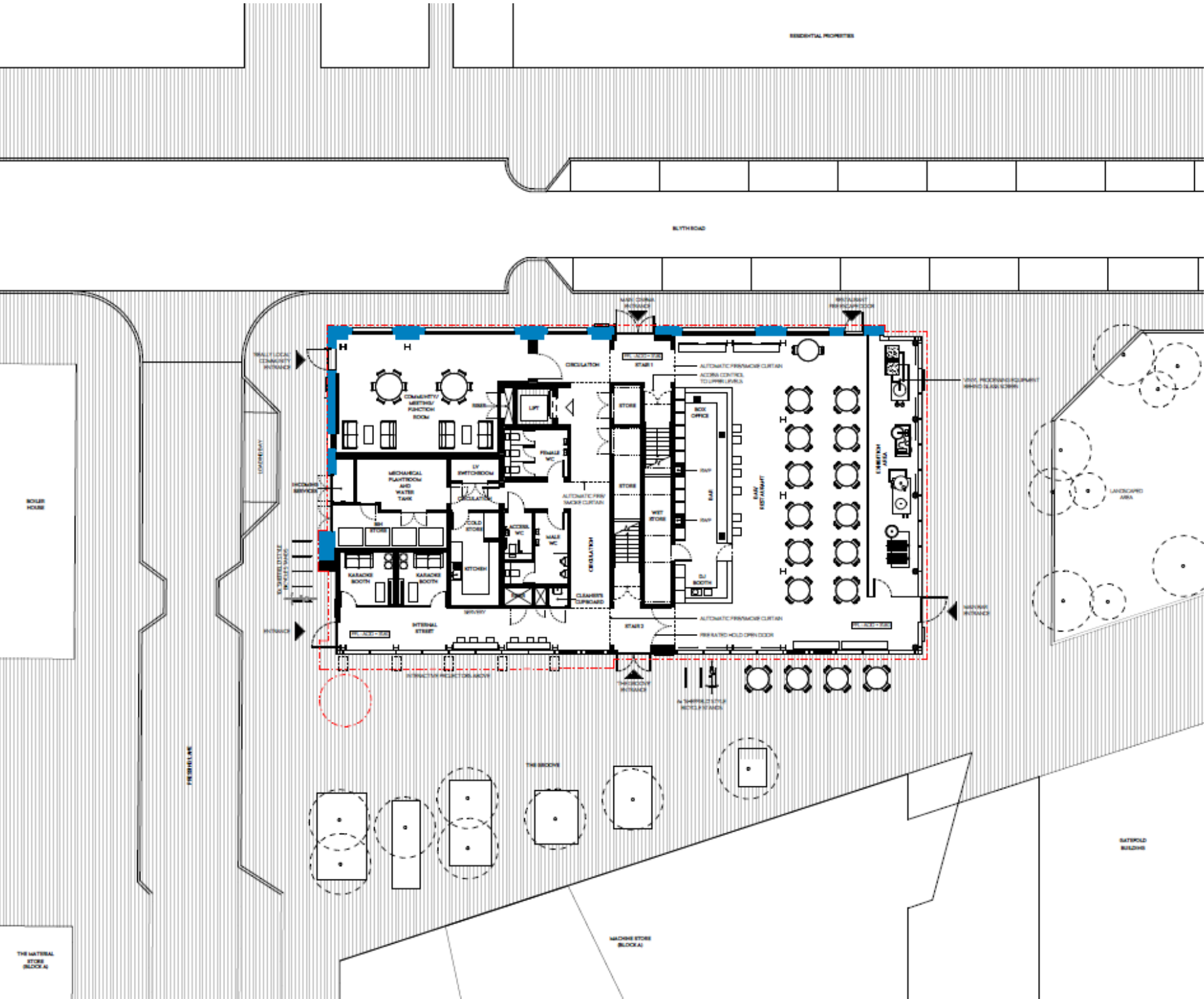


Figure 15: GRM-AI-XX-ZZ-DR-A-210 P06  
Proposed Level 00 Plan

5.1 DEVELOPMENT PROPOSALS AND ASSESSMENT OF IMPACT

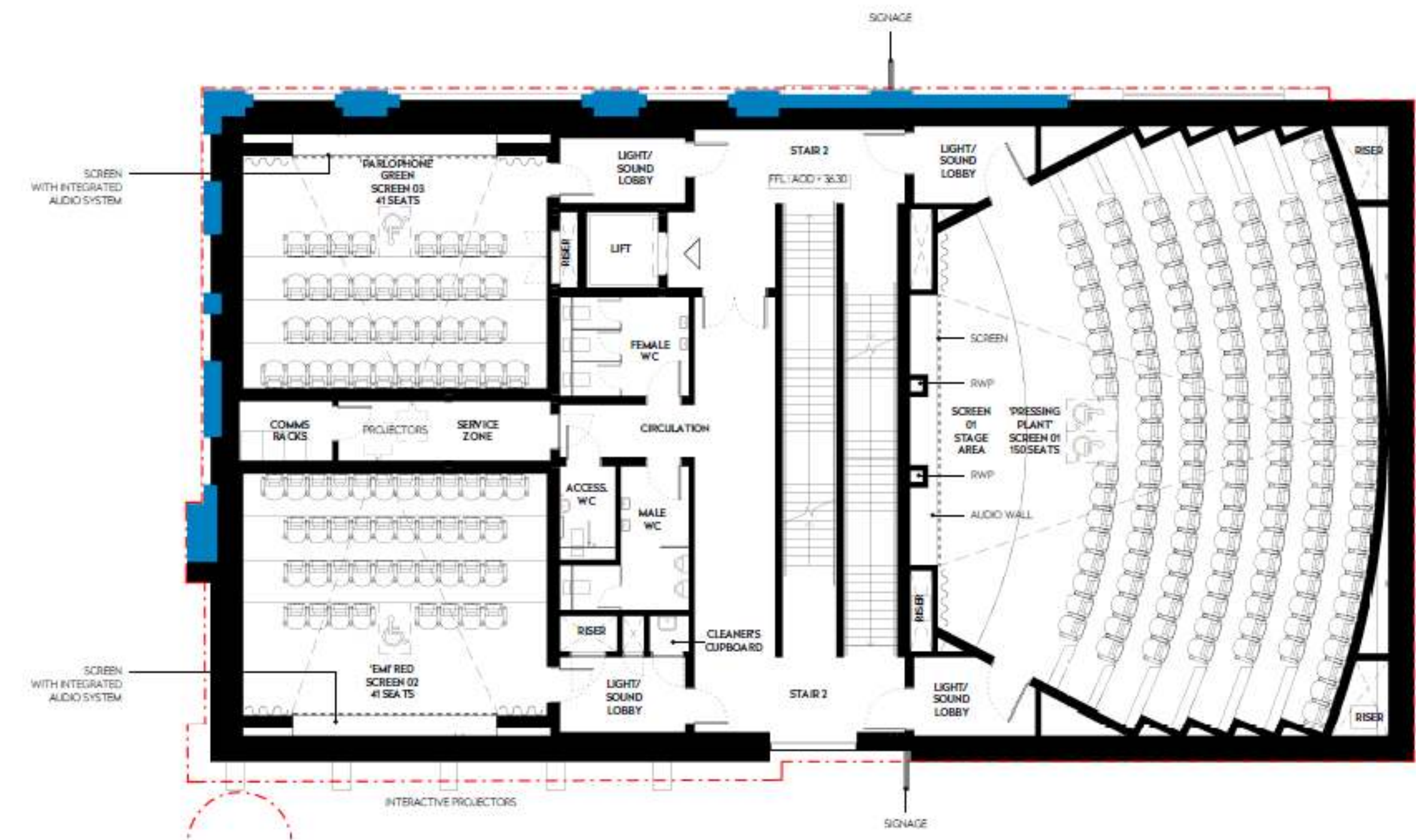


Figure 16: GRM-AI-XX-ZZ-DR-A-211 P06  
Proposed level 01



5.1 DEVELOPMENT PROPOSALS AND ASSESSMENT OF IMPACT

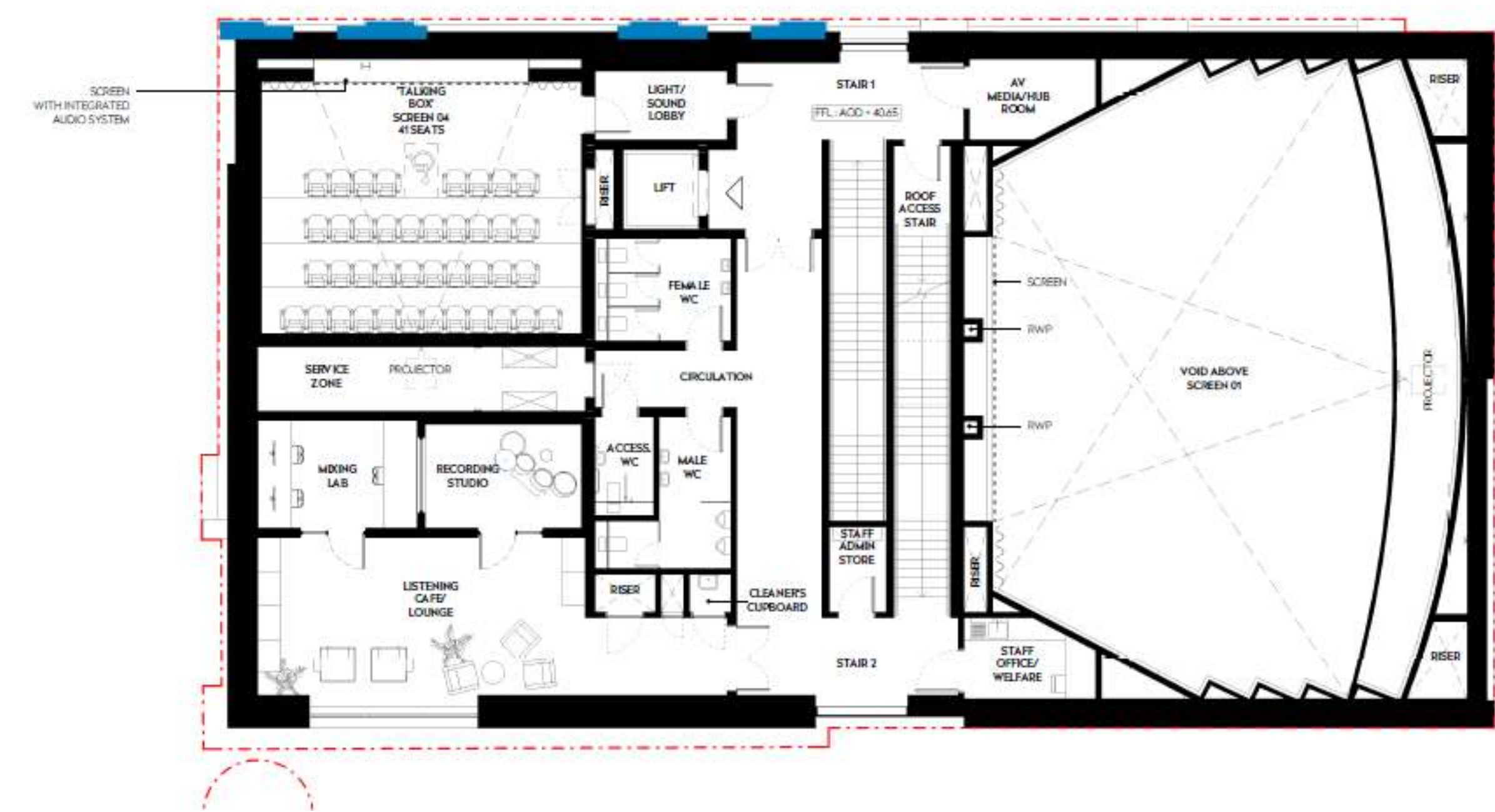


Figure 16: GRM-AI-XX-ZZ-DR-A-211 P06  
Proposed level 02

5.1 DEVELOPMENT PROPOSALS AND ASSESSMENT OF IMPACT

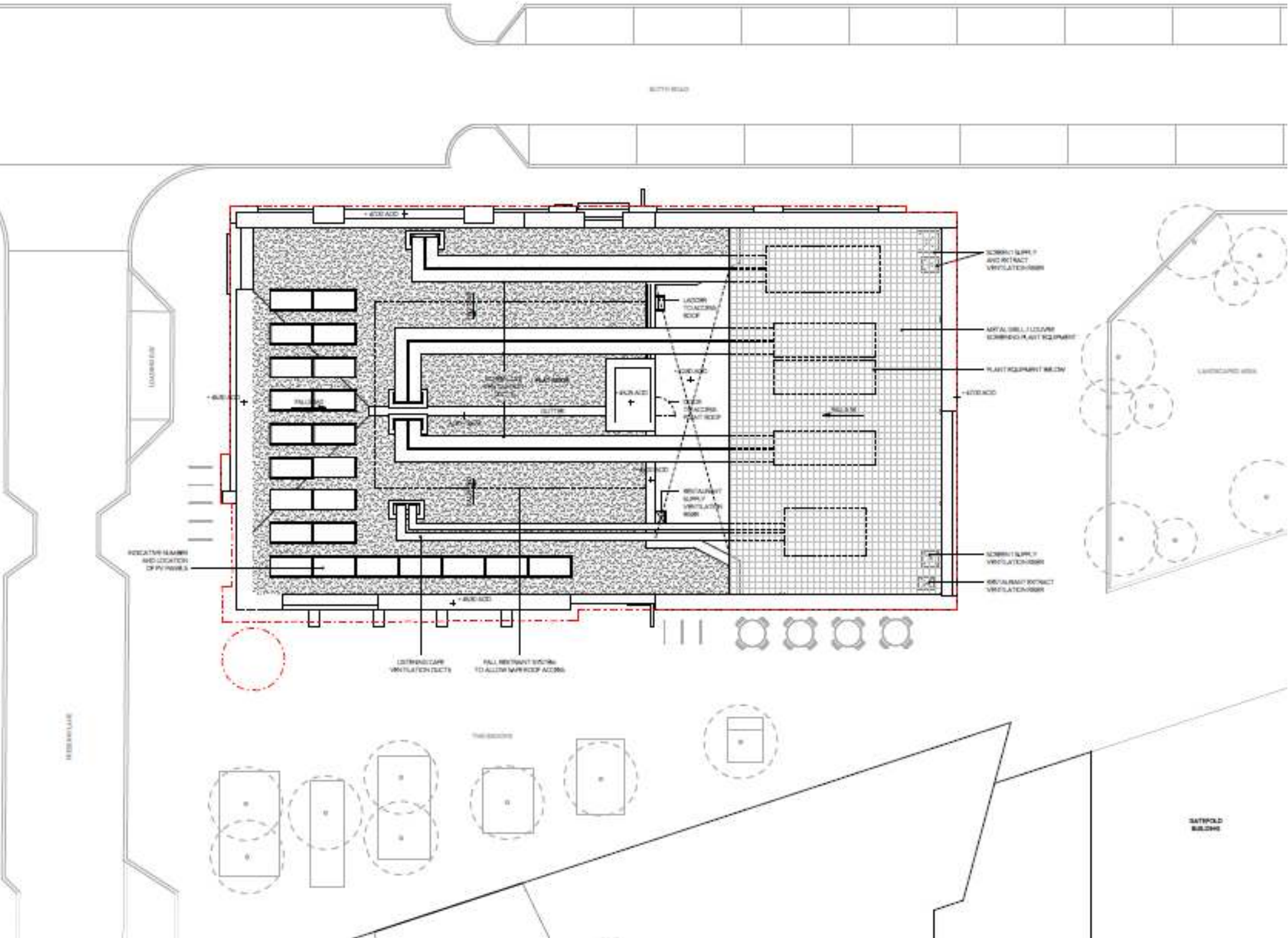


Figure 18: GRM-AI-XX-ZZ-DR-A-212 P05  
Proposed Roof Plan

5.1 DEVELOPMENT PROPOSALS AND ASSESSMENT OF IMPACT



Figure 19: GRM-AI-XX-ZZ-DR-A-301 P05

Proposed North and West Elevations



# 5.1 DEVELOPMENT PROPOSALS AND ASSESSMENT OF IMPACT

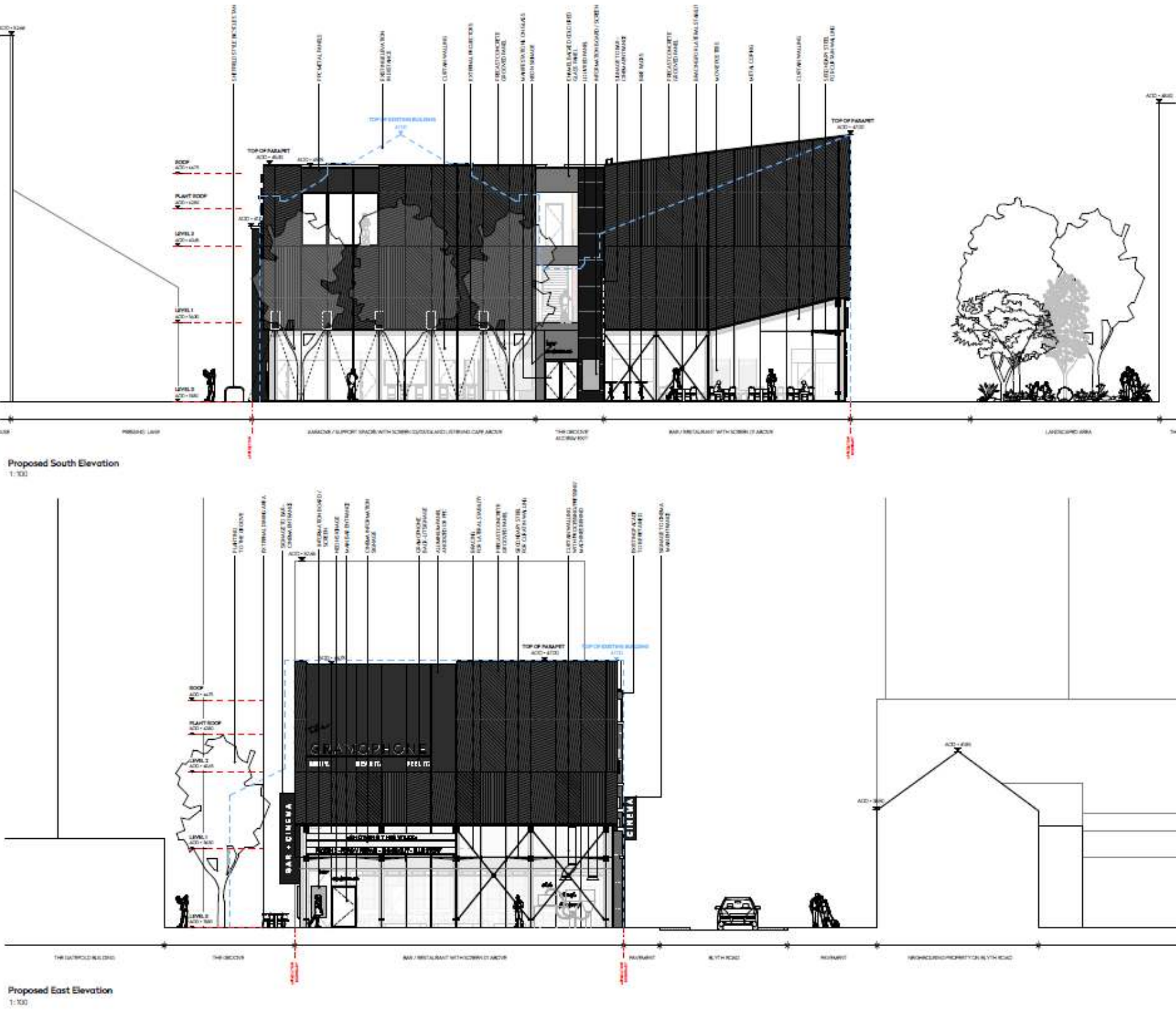


Figure 20: GRM-AI-XX-ZZ-DR-A-302 P05

Proposed East and South Elevation

## 6.0 CONCLUSIONS

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The conversion of the Old Pressing Plant within the Site to cinema use was approved, together with associated works by the London Borough of Hillingdon in January 2018 (ref.59872/APP/2016/3454). This assessment supports a Section 73 application regarding revision of proposals and drawings in order to ensure the viability of the consented proposed development.

The Site forms part of a group of designated and non-designated built heritage assets related to the former EMI factory on Blyth Road. This group of buildings have varying levels of individual architectural and historic interest, but collectively they have a high degree of historical interest deriving from their functional and historic relationship as a prominent manufacturing site associated with the British music industry in the 20th Century. The group value is such that the former EMI buildings and their immediate surroundings are designated as the Botwell: Thorn EMI Conservation Area. The revised proposals have not been identified as having any adverse effect on the significance of the relevant built heritage assets outside of the Site.

The proposed development, as part of a wider program of regeneration, is considered to represent a long term viable use to secure the future of the north elevation of the Old Pressing Plant locally listed building. This will ensure the continuation of the Old Pressing Plant's contribution to the local street scene and group value of the wider EMI factory complex. The proposed development will result in the loss of built fabric from the Old Pressing Plant that is of both negligible historic and architectural interest but will leave the north elevation and parts of the west elevation as a façade to a modern structure.

The proposal for a permanent historical archive exhibition within the proposed scheme is also considered relevant and beneficial to understanding the social and historical context of the building and the wider conservation area. This is considered to be a significant benefit.

The loss of built fabric will need to be weighed against the obvious public benefits of the regeneration scheme and the securing of the Old Pressing Plant's key historic fabric from further decay and disuse in a balanced judgement in accordance with paragraph 197 of the NPPF.

In accordance with the requirements set out by Section 189 of the National Planning Policy Framework (NPPF), this report has assessed the significance of relevant heritage assets, including any contribution made by their setting. It has also assessed the effects of the proposed development on their significance and explored ways that any harm arising from the proposed development could be reduced.

It is considered that the level of detail provided is proportionate to each heritage asset's significance and is sufficient to enable the Local Planning Authority to understand the impact of the development proposals in built heritage terms.



# APPENDICES

## APPENDIX A: STATUTORY LIST DESCRIPTION

### ENTERPRISE HOUSE

**Designation Type:** Listing

**Grade:** II

**List UID:** 1244861

**Date first listed:** 31-Oct-1997

**Statutory Address:** ENTERPRISE HOUSE, BLYTH ROAD

<https://historicengland.org.uk/listing/the-list/list-entry/1244861>

#### Details

TQ 07 NE 804/2/10040

HAYES BLYTH ROAD Enterprise House II

Former gramophone factory for His Master's Voice, now warehousing and industrial units. 1912 by the Trussed Concrete Steel Company, E Owen Williams senior designer. Reinforced concrete frame, with posts and beams using the Kahn system of reinforcement patented in 1903 by Albert and Julius Kahn in Detroit, USA, and painted brick infill. The building is unusual for its date not only in its system of construction but that this is expressed externally. Flat roof, with north-facing rooflights to rear. Irregular E-shaped plan, with offset centre denoted by rooftop water tank, its wings projecting to rear. Street facade is 1-10-3-5 bay composition, with offset three-bay centre containing staircase set round central liftshaft and topped by watertank - itself supported on a concrete frame treated as a tripartite arch to the streetfront. Small pane metal windows with central opening casements. Iron railing to roof. Sides and rear similar, but east side and rear with projecting frame indicating that the building was intended to be extended. The treatment of the reinforcement bars at the top of the columns as a form of capital is distinctive in concrete construction of this period and is also found internally. Sir E Owen Williams is the most significant engineer turned architect in twentieth-century British architecture, noted for his work for the Boots Pure Drug Company, the Daily Express and British Overseas Airways Corporation. This is his first known work. It is significant in its own right as an early reinforced concrete building which is unusual for its date in that the frame clearly expressed as a composition rather than hidden behind brick or render. This and the rooftop watertank, a curious architectural feature, has led to the building becoming known as 'Little Chicago'. Sources: The Builder, 29 March 1912, pp 375-7; Peter Collins, 'Concrete, the Vision of a New Architecture', 1959; David Cottam and Gavin Stamp, 'Sir E Owen Williams', 1986; Andrew Saint, 'Some Thoughts About the Architectural Use of Concrete', AA Files 21, 1991.

# APPENDICES

## APPENDIX B: LOCAL LIST ENTRIES

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### Apollo House - 297

120 Blyth Road, Hayes, UB3 1SY

Ward: Botwell

Use: Warehouse

Statement of significance/Reasons for designation Architectural: Mainly constructed in 1928, three stories in yellow buff brick, with brick piers and extensive glazing. The main façade is a prominent feature on Blyth Road. Northern elevation and part southern elevation are of particular interest, whereas remaining parts are of relatively low significance. Townscape: Key landmark and contributes to the street scene. Historic: Associated with the industrial history of the Borough.

### HMV/EMI building - 070

Blyth Road, Botwell, UB3 1HA

Ward: Botwell

Use: Industrial

Statement of significance/ Reasons for designation Architectural: Inter-war factory. Designed by Wallis Gilbert. Egyptian type details with battered walls in white render. Five storeys, massive appearance. Townscape: Group value, key landmark. Historical: Associated with the Borough's Industrial history.

### Former HMV Offices/ Jupiter House - 069

Blyth Road, Botwell, UB3 1HA

Ward: Botwell

Use: Industrial

Statement of significance/ Reasons for designation Architectural: Original HQ Building and Recording Studio in red brick "classical" style. Large three storey with two gables fronting onto Blyth Road. Red brick with stucco quoins. Gauged flat brick arches over windows; all original sashes now replaced with UPVC. Townscape: Contributes to local character and street scene, key landmark building. Historical: The former head office of the Gramophone company (His Masters Voice). Associated with Hillingdon's industrial history.

### Neptune House - 072

Blyth Road, Botwell, UB3 1BW

Ward: Botwell

Use: Vacant

Statement of significance/ Reasons for designation Architectural: The first factory building in the EMI complex, 1899. Modest building in white render and quoins. Used as a boiler house. Large two storey arched doorway with fanlights. Tall chimney. Attractive water tower to rear with decorative details. Townscape: Group Value within the Thorn/EMI Complex. Historic: Associated with the Industrial history.

### Thorn/EMI building - 071

Blyth Road, Botwell, UB3 1BW

Ward: Botwell

Use: Industrial

Statement of significance/ Reasons for designation Architectural: Inter-war factory adjoining other EMI buildings and designed by Wallis Gilbert. Simpler details, long symmetrical elevation facing onto the railway. Poor condition. Townscape: Key landmark on the railway line, Group Value within the EMI Complex. Historic: Associated with the Industrial history.



## APPENDIX C: REFERENCES

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