

The Assembly Buildings, The Old Vinyl Factory, Hayes Planning Statement

Prepared in support of the Full Planning Application for the conversion of commercial/ non-residential floor space into 9no. residential unit and 2no. additional parking spaces.



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Document History

Date	Version	Author	Revision/ Notes
07.12.2023	Draft	J.Spencer	Draft for Review
05.02.2024	1	J.Spencer & M.Smith	Version 1 issued with Planning Application

1. Introduction

- 1.1. This Planning Statement has been prepared by Weston Homes Plc (The Applicant) in support of the full planning application to convert 406sqm of commercial floor space/ mezzanine space into 9no. residential units comprising a mixture of apartments and duplexes, which include 2- and 3-bed units and reorientation of the parking on ground floor level to provide 4no. additional spaces.
- 1.2. The Application is submitted as a full planning application, with proposals for all elements of the Application provided.
- 1.3. This Planning Statement should be read alongside of a number of supporting documents and architectural drawings that have been commissioned in support of the application. These include:
 - a) Planning Application Forms;
 - b) Ownership Certificate and Agricultural Land Declaration;
 - c) Design and Access Statement by Weston Homes;
 - d) Relevant Application Fee;
 - e) Site Location Plan;
 - f) Drawing Schedule;
 - g) Application Drawings (see Drawing Schedule);
 - h) This Planning Statement by Weston Homes; and
 - i) Retail Statement by CPW Planning.
- 1.4. This Planning Statement is set out in the following Sections. Section 2 of this Planning Statement will describe the site itself and its surroundings. Section 3 will set out the relevant planning history relating to the Site. Section 4 will describe the proposals of the Application. Section 5 will set out the Planning Policy context. Section 6 will set out how the proposals within this Application that address the requirements of the most relevant Planning Policy and other material planning considerations. Section 7 provides an overall summary and conclusion.

About Weston Homes

- 1.5. Weston Homes was established in 1987, with its head office based in Takeley, Essex. Since its establishment, the Weston Group has grown rapidly and its portfolio of innovative, bespoke, new build development which range from traditionally styled, bricks and mortar houses and apartments buildings to contemporary, complex, higher density developments within London. These projects include new-build sites with ground-breaking contemporary design as well as the restoration and refurbishment of historical listed buildings.
- 1.6. Weston Home's schemes range from 50 units through to complex schemes of over a thousand homes, with no two sites being the same. Specialising from the outset in the regeneration of predominately brownfield sites, Weston Homes has become a leader in this area of development but also has a strong record on rural locations which have also included Clavering, Cambridge and Buntingford. With strong track record in delivery of between 600-1000 dwellings per annum, current development locations include; Wood Green, Bracknell, Sydenham, Barking, Bury St Edmunds and Takeley.

Modern Methods of Construction - British Offsite

- 1.7. Weston Homes Plc has recently undertaken significant development into Modern Methods of Construction (MMC) through the investment into sister company 'British Offsite' with its headquarters at Great Notley in neighbouring Braintree District.
- 1.8. British Offsite have been developing factory finished components, by utilising high tech manufacturing of modular systems for a number developments including bathroom vanity units, fitted furniture including wardrobes, kitchen worktops, and notably structurally insulated panels (SIP) to be used in the construction of building superstructure. These components are to roll onto all Weston Homes sites including conventional housing as well as apartment schemes.

2. Site Context

- 2.1. The Application Site forms the property known as The Assembly Buildings, which forms part of the wider development which is known as The Old Vinyl Factory, which is located within the London Borough of Hillingdon.
- 2.2. The Site is centrally located within the wider development parcel which is situated to southwest of Hayes Town Centre, in close proximity to Hayes and Harlington Station, both of which are within a 5 minute walk from the Application Site. See the Site location indicated on **Figure 1** below.



Figure 1 - Site Location

- 2.3. The railway line runs to the south of the Application Site, with the M4 situated within a 1.3 km to the south (accessed via the A312).

- 2.4. The whole of The Old Vinyl Factory (TOVF) site consists of approximately 6.6 hectares of land set in an irregular quadrilateral shaped site. The multi-phase site was originally constructed between 1907 and 1935 by the Gramophone Company and was later the production centre of EMI Ltd, producing the majority of vinyl records for distribution worldwide. Associated record production works had ceased by the 1980s after which time the site was largely vacant with many buildings falling into disrepair.
- 2.5. The Application Site is located centrally within the wider site, directly to the south of the new University Technical College building and to the north of The Record Store which is a locally listed building that has recently been refurbished and brought back into use. The wider site is bounded by Blyth Road to the north and by the Great Western Mainline railway to the South, with Hayes and Harlington rail station 420 metres to the east of the site. Opposite the site on Blyth Road lies the Grade II Listed Enterprise House, an eight storey office building, together with a variety of industrial and office buildings. The wider area is a mixture of residential, industrial and office uses with Hayes Town Centre located to the northeast of the site.
- 2.6. The proposals of this Application involve the conversion of existing commercial/ non-residential space within the existing building known as 'The Assembly Buildings' and also referenced as 'The Venue' which the development's sales name.

3. Planning History

- 3.1. The Application Site forms part of The Old Vinyl Factory site for which outline consent was granted in April 2013 under application Ref. No. 59872/APP/2012/1838 for the following:

"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 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, works to access and creation of new accesses and landscaping."
- 3.2. Following the Outline Consent, application Ref. No. 59872/APP/2013/3640 granted permission in January 2014 for a non-material amendment to the scheme, relating to revisions to the phasing of the site, and some revisions to various documents.
- 3.3. Application Ref. No. 59872/APP/2013/3775 granted a variation of the original outline permission in March 2014 to allow variations to phasing of the approved development.
- 3.4. Application Ref. No. 59872/APP/2015/1330 granted a Non-material Amendment to planning permission Ref. No. 59872/APP/2013/3775 in June 2015 to amend the approved parameter plans and Development Specification (Condition 31) and amend the wording of Condition 13 (acoustic buffering) in connection with the Material Store development.
- 3.5. Application Ref. No. 59872/APP/2018/1107 granted reserved matters consent in December 2018 relating to appearance and landscaping for Phase 3B, 'The Assembly Buildings' of The Old Vinyl Factory site.
- 3.6. Application Ref. No. 59872/APP/2020/342 granted a variation of the reserved matters approval (RMA) (Ref. No. 59872/APP/2018/1107) to include various changes to the approved scheme.
- 3.7. Application Ref. No. 59872/APP/2022/2847 granted a further variation to the RMA to include an additional stairwell, located on the southern elevation, providing emergency access to and from the podium.
- 3.8. Application Ref. No. 59872/APP/2022/3796 granted full planning permission for the change of use of first floor commercial/ non-residential space and excess plant space into 3no. residential units.

4. Application Proposals

- 4.1. This Planning Statement has been prepared by Weston Homes Plc (The Applicant) in support of the full planning application to convert 406sqm of commercial floor space/ mezzanine space into 9no. residential units comprising a mixture of apartments and duplexes, which include 2- and 3-bed units and reorientation of the parking on ground floor level to provide 4no. additional spaces.
- 4.2. The 9no. units will comprise 6no. duplexes (5x 2-bedroom 4-person and 1x 3B6P units) across the ground and first floor (currently mezzanine space) and 3no. apartments (1 x 2-bed 4-person, 1x 3-bed 5-person and 1x 3-bed 6-person units) located on the first floor (currently mezzanine space).
- 4.3. The duplex units will be accessed from front doors which are located on the northern elevation fronting onto 'The Groove' which is one of the main active routes through the wider site.
- 4.4. Apartments will be accessed via the internal stair and lift cores and are provided with internal secure and covered refuse and cycle storage.
- 4.5. Each unit is designed to meet internal space standards and is provided with suitable provision of private amenity space in the form of inset balconies and shared amenity space on the podium, accessed internally.
- 4.6. Each unit is provided with 1no. car parking space, which is provided within the existing parking on the ground and first floor. Policy-compliant provision of cycle parking facilities will be provided within the existing cycle storage space in the Assembly Buildings.
- 4.7. Externally, the elevations will be amended to remove the glazed façade of the commercial/ non-residential units on ground floor for the duplexes and across the first floor, where the design will be reflective of the materiality and architectural character of the approved scheme (Ref. No. 59872/APP/2022/2847).

5. Planning Policy

5.1. Paragraph 38 (6) of the Planning and Compulsory Purchase Act 2004 requires that:

“If regard is to be had to the development plan for the purpose of any determination to be made under the planning Act the determination must be made in accordance with the plan unless material considerations indicate otherwise.”

5.2. The Adopted Development Plan for The London Borough of Hillingdon (LBH) most relevant to this Application comprises the following:

- **The Local Plan: Part 1 - Strategic Policies (2012);**
- **The Local Plan: Part 2 - Development Management Policies (2020);**
- **The Local Plan: Part 2 - Site Allocations and Designations (2020); and**
- **The London Plan (March 2021).**

5.3. Other material considerations include The National Planning Policy Framework (NPPF) (2023), as well as relevant supplementary planning documents and guidance.

5.4. The Local Plan (2020): Part 1 contains the following Strategic Policies which are considered the most relevant to this Application:

- **Policy E5 – Town and Local Centres;**
- **Policy H1 – Housing Growth;**
- **Policy H2 – Affordable Housing;**
- **Policy HE1 – Heritage;**
- **Policy BE1 – Built Environment;**
- **Policy EM4 – Open Space and Informal Recreation;**
- **Policy EM6 – Flood Risk Management;**
- **Policy EM7 – Biodiversity and Geological Conservation; and**
- **Policy EM8 – Land, Water, Air and Noise.**

5.5. A summary of the requirements of each of these policies and how the proposals of this Application meet these requirements can be found within the policy audit at **Appendix A**.

5.6. The Local Plan (2020): Part 2 contains the following Development Management Policies which are considered the most relevant to this Application:

- **Policy DME 2 – Employment Uses Outside of Designated Sites;**
- **Policy DMTC 1 – Town Centre Development;**
- **Policy DMH 2 – Housing Mix;**
- **Policy DMH 7 – Provision of Affordable Housing;**
- **Policy DMHB 1 – Heritage Assets;**
- **Policy DMHB 2 – Listed Buildings;**
- **Policy DMHB 11 – Design of New Development;**
- **Policy DMHB 12 – Streets and Public Realm;**
- **Policy DMHB 13 – Shop Fronts;**
- **Policy DMHB 14 – Trees and Landscaping;**
- **Policy DMHB 15 – Planning for Safer Places;**
- **Policy DMHB 16 – Housing Standards;**

- **Policy DMHB 17 – Residential Density;**
- **Policy DMHB 18 – Private Outdoor Amenity Space;**
- **Policy DMEI 2 – Reducing Carbon Emissions;**
- **Policy DMEI 9 – Management of Flood Risk;**
- **Policy DMEI 10 – Water Management, Efficiency and Quality;**
- **Policy DMEI 12 – Development of Land Affected by Contamination;**
- **Policy DMEI 14 – Air Quality;**
- **Policy DMCI 3 – Public Open Space Provision;**
- **Policy DMT 1 – Managing Transport Impacts;**
- **Policy DMT 2 – Highways Impact**
- **Policy DMT 5 – Pedestrians and Cyclists; and**
- **Policy DMT 6 – Vehicle Parking.**

5.7. A summary of the requirements of each of these policies and how the proposals of this Application meet these requirements can be found within the policy audit at **Appendix A**.

5.8. The London Plan (2021) comprises the following policies which considered the most relevant to this Application:

- **Policy GG 2 – Making the best use of land;**
- **Policy SD 6 – Town centres and high streets;**
- **Policy D 3 – Optimising site capacity through the design-led approach;**
- **Policy D 4 – Delivering good design;**
- **Policy D 5 – Inclusive design;**
- **Policy D 6 – Housing quality and standards;**
- **Policy D 7 – Accessible housing;**
- **Policy D 8 – Public Realm;**
- **Policy D 14 – Noise;**
- **Policy H 1 – Increasing housing supply;**
- **Policy H 4 – Delivering affordable housing;**
- **Policy H 10 – Housing size mix;**
- **Policy HC 1 – Heritage conservation and growth;**
- **Policy G 6 – Biodiversity and access to nature;**
- **Policy SI 1 – Improving air quality;**
- **Policy SI 2 – Minimising greenhouse gas emissions;**
- **Policy SI 3 – Energy infrastructure;**
- **Policy SI 4 – Managing heat risk;**
- **Policy SI 5 – Water infrastructure;**
- **Policy SI 12 – Flood risk management;**
- **Policy SI 13 – Sustainable drainage;**
- **Policy T 3 – Transport capacity, connectivity and safeguarding;**
- **Policy T 4 – Assessing and mitigating transport impacts;**
- **Policy T 5 – Cycling; and**
- **Policy T 6 – Car parking.**

5.9. A summary of the requirements of each of these policies and how the proposals of this Application meet these requirements can be found within the policy audit at **Appendix A**.

5.10. The following are the most relevant paragraphs within the NPPF (2023) related to the proposals of this Application:

- **Paragraph 8;**
- **Paragraph 11;**
- **Paragraph 38;**
- **Paragraph 60;**
- **Paragraph 75;**
- **Paragraph 76;**
- **Paragraph 81;**
- **Paragraph 82;**
- **Paragraph 83;**
- **Paragraph 86;**
- **Paragraph 87;**
- **Paragraph 88;**
- **Paragraph 92;**
- **Paragraph 98;**
- **Paragraph 105;**
- **Paragraph 111;**
- **Paragraph 112;**
- **Paragraph 119;**
- **Paragraph 120;**
- **Paragraph 123;**
- **Paragraph 126;**
- **Paragraph 130;**
- **Paragraph 159;**
- **Paragraph 161;**
- **Paragraph 174;**
- **Paragraph 183;**
- **Paragraph 184; and**
- **Paragraph 185.**

5.11. A summary of the requirements of each of these paragraphs and how the proposals of this Application meet these requirements can be found within the policy audit at **Appendix A.**

6. Planning Considerations

6.1. This section will explore the main issues in relation the Application, which are considered to include:

- A) Principle of Development;**
- B) Retail Impact;**
- C) Housing Delivery;**
- D) Housing Provision;**
- E) Design, Appearance & Layout;**
- F) Access, Highways & Parking;**
- G) Heritage;**
- H) Flood Risk & Drainage;**
- I) Ecological & Arboricultural Matters;**
- J) Energy & Sustainability;**
- K) Air Quality;**
- L) Noise; and**
- M) Contamination.**

A) Principle of Development

6.2. As explained above, the Site forms the Assembly Buildings, which is a recently completed development forming a central part of the wider Old Vinyl Factory Redevelopment.

6.3. The application for the Assembly Buildings (Ref. No. 59872/APP/2022/2847) was initially granted planning permission in December 2018, before a number of subsequent Section 96a (non-material) and Section 73 (minor material) amendment applications we submitted and approved to secure a number of changes, as described in Section 3.

6.4. Although it is noted that this application was initially determined under a previous Local Plan and London Plan, it still holds weight and is deemed to establish the principle of the redevelopment of the Application Site.

6.5. The application for the Assembly Buildings would have also been assessed against a now superseded version of the NPPF, albeit that the principles of sustainability and presumption in favour of sustainable development now set out under paragraph 8 and 11 respectively would have still been relevant at that time. As such, it is deemed the Site was deemed sustainable and appropriate for development under the previous iteration of the framework, a position which remains unchanged.

6.6. The position of approaching applications creatively and positively to make effective and efficient use of land, to achieve multiple benefits is a position currently set out under NPPF paragraphs 38, 119, 120 and 123, which is reflective in the earlier iteration of the NPPF which the Assembly Buildings application would have been assessed against. The proposals of this Application will not compromise the mix of uses delivered within the Assembly Buildings, as commercial units remain on the ground floor.

6.7. The Application before you seeks to deliver 9no. additional units within the already consented and approved Assembly Buildings. This scheme has been designed in a way which seeks to ensure there is no material impacts, particularly in relation to retail and employment space. The Application represents an opportunity to contribute towards the governments objective of significantly boosting the supply of new homes, set out under paragraph 60 of the NPPF.

B) Retail Impact

6.8. A Retail Statement has been prepared by CPW Planning in support of this Application which is focused on justifying the loss of commercial space within Retail Units 03 and 04, resulting from the changes proposed.

6.9. This loss of space is limited to 406sqm at ground floor, together with 788sqm of space at first floor which would have comprised the potential mezzanine floor level.

6.10. In regard to the justification for the loss of this space, the report focuses primarily on the following 4 areas of concern:

- Retail market conditions and trends
- Marketing and the lack of demand
- Extant planning permission consideration
- Commercial space vacancy

6.11. In regards to the current retail market conditions and trends, the report sets out that demand has been heavily impacted by the Covid-19 pandemic and, more recently, the cost-of-living crisis. The growth of online shopping, changes to shopping, work and lifestyle habits has also had an impact on the continued decline in retailer demand, with reduced footfall and increasing number of retailer closures. The report sets out relevant data which reflects the market conditions, which mean that secondary and tertiary retail locations (which the units on Site are categorised as such) are particularly challenged by the lack of occupier demand.

6.12. The report notes that there is no policy requirement for retail premises to be marketed for a period of time before they can be released for alternative uses. A letter is appended to the CWP report, which has been provided by the commercial agents for the Site, providing some detail around the marketing conditions, concluding that demand from potential occupiers is low and is likely to remain low in the future.

6.13. The proposals relate to Retail Units 03 and 04, which form part of the residential-led scheme which has been recently completed, excluding the commercial space at first floor (or mezzanine) level.

6.14. Each of the retail units have been designed and built to facilitate the inclusion of a full cover mezzanine, which can be provided if occupiers require.

6.15. Approximately 72% of the commercial space to be 'lost' resulting from the proposals (i.e. 788 sqm) comprises prospective mezzanine floorspace, which has never been guaranteed to come forward. Furthermore, the non-delivery of such floorspace is of no material consequence to the achievement of masterplan objectives, placemaking and/or active frontages at The Venue.

- 6.16. The commercial space proposed to be lost at ground floor level is limited to 309 sqm within Retail Unit 03 and Retail Unit 04. Both of these retail units would remain, but in a smaller format and will maintain active frontages to the street.
- 6.17. The report also includes a detailed assessment of the available vacant retail space and concludes that there is evidently no issue, both within the masterplan area and Hayes Town Centre with available retail space.
- 6.18. The report therefore concludes that the proposals to release commercial space at The Venue, to allow for new residential units, principally respond to prevailing retail market conditions and the lack of commercial occupier demand. It is further the case (in part for the reasons just outlined) that The Old Vinyl Factory site has no established 'critical mass' of retail activity, with substantial commercial components of the masterplan area standing vacant or incomplete, which has direct consequences for the area's attractiveness to potential occupiers and for the scale of retail and other commercial floorspace that can be supported at The Venue.
- 6.19. It has also been demonstrated that, in addition to the vacant commercial floorspace within the masterplan area, Hayes Town Centre (less than a 10-minute walk to the northeast) has seen its number of vacant street-level commercial properties more than double since August 2021, with vacant units ranging between 38 sqm gross and 2,212 sqm gross. In this context, there is no supply-side issue, and the principal reason for the level of existing vacancies is a lack of commercial occupier demand as experienced with The Venue's retail units forming part of this application.

C) Housing Delivery

The Overall Need for Homes

- 6.20. Paragraph 60 of the NPPF sets out that the Government has an objective to significantly boost the supply of new homes, which is reflective in local requirements set for new housing in the Borough, as set out in Local Plan Strategic Policy H 1 which sets out that the borough needs to deliver 6,375 new homes in the period up to 2026. London Plan Policy H1 sets the 10-year target for Hillingdon to deliver 10,830 new homes.
- 6.21. The Application proposes 9no. new 2-, and 3-bedroom homes, which will contribute towards the identified need for homes in the borough.

The Optimisation of Sites

- 6.22. The Application proposals seek to use existing employment/ commercial space which is deemed to be surplus to requirements and demand as set out in the Retail Statement prepared by CWP Planning in support of this Application.
- 6.23. The proposals include the loss of 406sqm of commercial/ non-residential floor space for the provision of the 9no. units, whilst also maintaining some retail frontage in the most appropriate locations and not compromising the desirability and saleability of the commercial/ non-residential units.

- 6.24. Through the reduction in commercial/ non-residential floor space and the reorientation of parking on the ground floor level, 4no. additional parking spaces are now proposed which will help facilitate the demand from the uplift in units.
- 6.25. This approach to optimising sites which in turn helps to boost the supply of new homes, without any detrimental impact complies with the provisions of Local Plan Development Management Policy DMHB 17, London Plan Policies GG2 and D3 as well as the provisions of paragraphs 119 and 120 of the NPPF.

D) Housing Provision

Housing Mix

- 6.26. **Figure 2** below sets out the mix of units proposed by this Application.

	1-bed 2-person		2-bed 4-person		3-bed 5-person	
Unit Type	Apartment	Duplex	Apartment	Duplex	Apartment	Duplex
Quantity	0	0	1	5	1	1

Figure 2 - Proposed Unit Mix

- 6.27. As shown above, the 9no. units provide a variety of unit types and sizes, which is inline with the requirements of Local Plan Development Management Policy DMH 2 and London Plan Policy H10.

Affordable Housing

- 6.28. The Application proposals include 9no. units, which falls below the threshold of 10no. units required for the provision of affordable housing set out under Local Plan Strategic Policy H2 and Local Plan Development Management Policy DMH 7 and London Plan Policy H 4.
- 6.29. However, 3no. units (see Schedule of Accommodation submitted alongside this application) will be provided as Discount Market Sale units, which exceed the policy requirement for this application.

E) Design, Appearance & Layout

Approved and Implemented Design

- 6.30. As set out above, the 9no. units which will be provided within the footprint of the existing building on Site (the Assembly Buildings).
- 6.31. The units will be provided by redeveloping all of the first floor mezzanine space on the northern elevation and some of the ground floor in this area to facilitate the ground floors of the duplex units.
- 6.32. The proposals have been sensitively designed to retain some commercial/ non-residential presence in the most appropriate places of the ground floor, which integrating the duplex units to maintain some form of active frontage.
- 6.33. The first floor will be design to be reflective of the materiality and character of the approved and completed building and maintain the established safety principles, which was deemed appropriate from a design and quality perspective.

6.34. As such, the proposals of this Application are reflective of an already accepted approach in terms of design, and so would accord with the provisions of Local Plan Strategic Policy BE1, Local Plan Development Management Policies DMHB 11, DMHB 13, DMHB 15, London Plan Policy D 4 and the provision of paragraphs 126 and 130 of the NPPF.

Open Space and Public Realm

6.35. As explained above, the proposals of this Application are all within the existing built footprint of the Assembly Buildings, and do not include any external proposals other than the relevant elevational changes. Therefore, in terms of public realm and open space, this will be as per the provision delivered for the Assembly Buildings, which the additional 9no. units will benefit from.

6.36. As the open space and public realm proposed to be used by the additional units is that provision which was agreed and provided for the Assembly Buildings, is considered to be an acceptable provision in line with Local Plan Strategic Policy EM4, Local Plan Development Management Policies DMHB 12, DMHB 14, DMCI 12, London Plan Policy D 8 and the provisions of paragraphs 92 and 98 of the NPPF.

Internal Layouts

6.37. The proposed units have been designed to meet internal spaces standards and will also meet the requirements of part M of the Building Regulations, inline with the provisions of Local Plan Development Management Policies DMHB 16, and London Plan Policy D 7.

Amenity Provision

6.38. Each unit will also be provided with a private inset balcony which will be the same size as the balconies provided within the proposed and completed Assembly Buildings Scheme, and as such is considered to comply with Local Plan Development Management Policy DMHB 18.

F) Access, Highways & Parking

Car Parking

6.39. Parking is provided on the ground and first floor and the majority of residents of the additional units will be able to access a parking space which is to be provided within the existing provision as and when there is demand for such spaces.

6.40. However, the reduction in commercial/ non-residential floor space and the reorientation of parking on the ground floor level, 4no. additional parking spaces are now proposed which will help facilitate the demand from the uplift in units.

6.41. It is considered that this demand dependant approach will ensure access to parking, whilst not overproviding for this when there is an overarching policy movement away from dependence on the private car for journeys, especially in such sustainable locations.

6.42. Accordingly, this less car-centric approach to parking is deemed to be in compliance with the maximum requirements set out in Local Plan Development Management Policy DMT 6, London Plan Policy T 6 and is also in compliance with the general provisions of paragraph 112 of the NPPF.

Cycle Parking

6.43. Cycle parking storage is provided within the existing building. As part of this Application 18no. additional cycle parking spaces will be provided in line with the requirements set out in the adopted standards for the additional 9no. units, in accordance with Local Plan Development Management Policy DMT 3, London Plan Policy T 5 and the provisions of paragraph 112 of the NPPF.

Highway Impact

6.44. As the proposals do not include any additional car parking, it is envisaged that no further trips will be generated compared to those modelled under the planning permission for the existing building, which was deemed acceptable in terms of highway impact. As the impact remains unchanged compared to that of the approval of the existing building, it is deemed that the proposals would accord with the provisions of Local Plan Development Management Policies DMT 1 and DMT 2, London Plan Policies T 3 and T 4 and the provisions of paragraph 111 of the NPPF.

G) Heritage

6.45. The Application for the existing building was assessed in regard to its impact on nearby heritage assets, including the Grade II listed Enterprise House. The conclusions of this assessment were that the impacts were not detrimental enough to refuse the application. Hence, planning permission was granted and the development has now been delivered.

6.46. The proposals of the Application before you are located in just as close proximity to the Grade II listed Enterprise House as the approved and implemented Assembly Buildings. However, the proposals of this Application are all internal/ within the existing building other than some minor changes to the existing elevation. With this in mind, the proposals would have no impact on the setting of Enterprise House due to the minor nature of the proposals compared to the existing situation.

6.47. As such, the proposals are not deemed to conflict with the provisions of Local Plan Strategic Policy HE1, Local Plan Development Management Policies DMBH 1 and DMHB 2 and London Plan Policy HC 1.

H) Flood Risk & Drainage

6.48. The Site is located within Flood Zone 1, and so is at low risk of flooding. It is also noted that the Site was deemed appropriate for the development of the existing building on Site due to this low risk of flooding and inline with the sequential approach to determining sites which are appropriate for development.

6.49. The proposals will not alter the flood alleviation strategy proposed, approved and implemented for the Assembly Buildings, and as such, drainage on Site is deemed appropriate and acceptable.

6.50. It is therefore deemed that the proposals would not conflict with the provision of Local Plan Strategic Policy EM6, Local Plan Development Management Policies DMEI 9 and DMEI 10, London Plan Policies SI 12 and SI 13 and the provisions of paragraphs 159 and 161 of the NPPF.

I) Ecological & Arboricultural Matters

6.51. Ecological and Arboricultural matters were discussed and considered as part of the approval of the existing building on Site.

6.52. As the proposals of this Application are internal, they will have no impact on ecology or any trees, and as such, the proposals would not conflict with the provisions of Local Plan Strategic Policy EM7, London Plan Policy G 6 and the provision of paragraph 174 of the NPPF.

J) Energy & Sustainability

General Sustainability Principles

6.53. As the 9no. units are situated within the existing buildings, they have been designed to incorporate the same principles of sustainability as the residential units within the existing buildings.

6.54. As this building was recently granted planning permission and developed out, it is deemed that these principles of sustainability remain acceptable and therefore the scheme accords with the provisions of Local Plan Development Management Policy DMEI 2 and London Plan Policy SI 2.

Energy Strategy

6.55. As the proposed units are within the fabric of the existing building, it is proposed that they will adopt the same energy strategy which was approved and implemented for the Assembly Buildings, which includes connection into the communal heating system for the wider Old Vinyl Factory Site.

6.56. As this strategy has only recently been approved and implemented, it is considered to be an acceptable approach and one which is in accordance with the provisions of London Plan Policies SI 2, SI 3 and SI 4.

Water Efficiency

6.57. The proposed units will also take the same approach to water efficiency which has been approved and implemented for the existing building. This strategy will ensure that the units will achieve the required water efficiency standard of a maximum of 105 litres per person per day, inline with the requirements of Local Plan Strategic Policy EM8, Local Plan Development Management Policy DMEI 10

K) Air Quality

6.58. As the proposed units are to be located within the existing building, it is considered that they will not be exposed to an unacceptable level of air quality, which will be the same as the level of air quality experience by the recently approved and delivered units.

- 6.59. The proposals do not include any additional parking and as such traffic generated from the development will not increase the levels assessed under the planning permission for the existing building. With this in mind the proposals will have no detriment to the air quality condition in the area as a result of carbon emissions from private car journeys.
- 6.60. With the above in mind, it is considered that the proposals would accord with the provision of Local Plan Strategic Policy EM8, Local Plan Development Management Policy DMEI 14 and London Plan Policy SI 1.

L) Noise

- 6.61. As the proposed units are within the fabric of the existing building, it is proposed that they will be subject to the same level of noise, which the existing building was assessed against and ultimately deemed acceptable.
- 6.62. Condition 27 of the Outline Consent (listed as Condition 28 originally) relating to the existing building on Site, included the requirement to submit a detailed noise insulation scheme to the Council for approval. A detailed scheme was submitted and approved under application Ref. No. 59872/APP/2018/1104.
- 6.63. As this approach has been assessed and deemed acceptable, this approach to noise insulation will be carried forward and implemented within the proposed 9no. units. Accordingly, the proposals are deemed to comply with the provision of Local Plan Strategic Policy EM8 and London Plan Policy D 14.

M) Contamination

- 6.64. All contamination works have been agreed and implemented for the existing building under the outline consent and subsequent reserved matters submission (as amended).
- 6.65. The proposals of this Application are all internal, within the existing building, and as such there is no impact in regard to contamination, which has been appropriately mitigated as approved. With this in mind, it is considered that the proposals would accord with the provision of Local Plan Strategic Policy EM8, Local Plan Development Management Policy DMEI 12 and the provisions of paragraphs 183, 184 and 185 of the NPPF.

7. Conclusions

- 7.1. This Application poses an opportunity to make use of surplus commercial spaces within the existing building on the Application Site to provide 9no. units include a mixture of unit types and sizes.
- 7.2. The Retail Statement produced by CWP Planning in support of this Application provides robust justification for the conversion of this surplus space to provide the units. It is proposed that all of the first floor mezzanine space will be removed on the northern elevation and a small proportion of the ground floor commercial space to facilitate the 6no. duplex units.
- 7.3. Ground floor commercial space will be maintained on the corners of the building, which are deemed the most prominent locations, appropriate for the proposed uses. The amendments to the layouts of the commercial space, including removal of the mezzanine space and some ground floor space will not reduce the saleability of the units and their desirability. As such, there is remains the ability to incorporate the vision of delivering a mixed-use development, whilst also delivering a further 9no. units.
- 7.4. Parking provision has been uplifted by 4no additional spaces through the reduction in commercial/non-residential space as well as the reorientation of the parking layout on the ground floor. Residents of the proposed units will have the opportunity to take up parking spaces within the existing provision or one of the 2no. additional spaces if they so wish. However, given the highly sustainable location of the development, particularly its close proximity to the Elizabeth Line at Hayes and Harlington, car parking space uptake is envisaged to be lower when compared to less sustainable locations.
- 7.5. As set out in Section 6, it is considered that the scheme would not conflict with any of the adopted policies and represents a sustainable proposal to deliver a further 9no. units within the scheme.

Appendix A – Policy Audit

Policy Audit

Policy	Summary	Assessment of Proposed Development	Relevant Consideration
LBH Local Plan: Part 1 – Strategic Policies (2020)			
Policy E5 – Town and Local Centres	<p>This policy sets out that planning decisions will be taken in accordance with the provisions of national guidance, in particular the sequential and impact tests.</p>	<p>As set out in the Retail Statement produced by CWP Planning in support of this Application, there is a supply of vacant units within the town centre, which are sequentially preferred to the provision on the Application Site. A reduction in commercial/ non-residential floor spaces, will have minimal, if not, a positive impact on the nearby town centre as a result of providing lower provision of 'out-of-centre' alternatives, in lieu of which further housing will be provided which will increase the number of people in the area as potential customers and people spending money in the area.</p>	Retail Impact
Policy H1 – Housing Growth	<p>This policy sets out that the Council will meet and exceed its minimum strategic dwelling requirements, where this can be achieved.</p> <p>The boroughs target for additional dwellings is 6,375 dwellings up to 2026.</p>	<p>The proposals include the provision of 9no. homes to contribute towards this identified need for homes within the borough.</p>	Housing Delivery
Policy H2 – Affordable Housing	<p>This policy sets out that housing provision is expected to include a range of types to meet the needs of all types of households,</p> <p>For sites with a capacity of 10 or more units the Council will seek to ensure that the affordable housing mix reflects housing needs in the borough, particularly the need for larger family units.</p>	<p>The proposals only include 9no. dwellings, which would fall below the threshold to provide affordable housing.</p>	Housing Provision
Policy HE1 – Heritage	<p>This policy sets out that the Council will conserve and enhance Hillingdon's distinct and varied environment, its setting and the wider historic landscape.</p>	<p>The impact arising from the development of the Assembly Buildings and the wider Old Vinyl Factory development has been assessed and deemed acceptable. The proposals of this Application will not alter the conclusions of the acceptability of the impact on heritage assets as the proposals are located internally within the existing buildings.</p>	Heritage
Policy BE1 – Built Environment	<p>This policy sets out that the Council will require all development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods, setting out a number of criterium which development proposals are expected to meet.</p>	<p>The existing buildings was deemed to be designed to an acceptably high quality within the relevant planning permission. The proposals of this Application take a design approach which is reflective of the existing building, and as such is deemed acceptable.</p>	Design, Appearance and Layout

Policy	Summary	Assessment of Proposed Development	Compliance
Policy EM4 – Open Space and Informal Recreation	<p>This policy set out that the Council will safeguard, enhance and extend the network of open spaces, informal recreation and environmental opportunities. Provision should be made in as close proximity as possible to the community which it is serving.</p> <p>The Council will seek to protect existing tree and landscape features and enhance open spaces with new areas of vegetation cover.</p>	<p>No open space or informal recreation provision is proposed within this Application. Instead, it is envisaged that the proposed 9no. units will benefit from the existing public realm in the area as well as any further public realm which is proposed within committed developments.</p>	Design, Appearance and Layout
Policy EM6 – Flood Risk Management	<p>This policy set out that the Council will require new development to be directed away from Flood Zones 2 and 3 in accordance with the principles of the NPPF.</p> <p>The Council will require all development across the borough to use sustainable urban drainage systems (SUDS) unless demonstrated that it is not viable.</p>	<p>A flood alleviation strategy has been approved and delivered as part of the Assembly Building scheme. The proposals of this Application will not increase flood risk due to the internal nature of the proposals.</p>	Flood Risk and Drainage
Policy EM7 – Biodiversity and Geological Conservation	<p>This policy sets out that the Council will ensure that Hillingdon's biodiversity and geological conservation will be preserved and enhanced.</p>	<p>Due to the internal nature of the proposals, there will be no impact on biodiversity and geological conservation.</p>	Ecological and Arboricultural Matters
Policy EM8 – Land, Water, Air and Noise	<p>Water Quality: This policy sets out that the Council will seek to safeguard and improve all water quality, both ground and surface.</p> <p>Air Quality: All development should not cause deterioration in the local air quality levels and should ensure to protect both existing and new sensitive receptors.</p> <p>Noise: The Council will also seek to ensure that noise sensitive development and noise generating development are only permitted if noise impacts can be adequately controlled and mitigated.</p> <p>Contamination: The Council will expect proposals for development on contaminated land to provide mitigation strategies that reduce the impacts on surrounding land uses.</p> <p>Water Sources: The Council will require that all new development demonstrates the incorporation of water efficiency measures within new developments to reduce the rising demand on potable water. For residential development, the Council will require applicants to demonstrate that water consumption will not surpass 105 litres per person per day.</p>	<p>The water quality in the area will not be impacted upon by the proposals of this Application, which are within the existing building on Site.</p> <p>It is envisaged that there will be no deterioration in local air quality levels resulting from the proposals, which do not include any substantial increase in likely trip generation compared to the existing development, as there is only 4no. additional parking spaces proposed.</p> <p>The noise mitigations measure secured within the existing building will be implemented within the proposals of these 9no. units, including the need to achieve the defined noise reduction. An appropriately worded condition may be included should planning permission be granted for this Application, to secure such measures.</p> <p>The proposals of this Application are not impacted by contamination, for which an appropriate mitigation scheme was secured and delivered for the development of the existing building.</p> <p>The proposed development will achieve the required water efficiency standard of a maximum of 105 litres per person per day. This can be secured via an appropriately worded condition.</p>	<p>Air Quality Noise Contamination Energy & Sustainability</p>

Policy	Summary	Assessment of Proposed Development	Compliance
LBH Local Plan: Part 2 – Development Management Policies (2020)			
Policy DME 2 – Employment Uses Outside of Designated Sites	<p>This policy sets out that development proposals which involve the loss of employment floorspace or land outside of designated employment areas will normally be permitted if:</p> <ul style="list-style-type: none"> i) the existing use negatively impacts the local community; or ii) the site is unsuitable for employment reuse or development; or iii) sufficient evidence has been provided to demonstrate there is no realistic prospect of the land being reused for employment purposes; or iv) the new use will not adversely affect the functioning of any adjoining employment land; or v) the proposed use relates to a specific land use allocation or designation identified elsewhere in the plan. 	<p>The Retail Statement produced by CWP Planning in support of this application provides sufficient evidence to justify the lack of demand for the retail spaces within the existing buildings. Accordingly, the loss of some of the ground floor space and all of the first floor mezzanine space would not be detrimental in terms of loss of employment space, as there is minimal demand for said space.</p>	Retail impact
Policy DMTC 1 – Town Centre Development	<p>This policy sets out that the Council will support 'main town centre uses' where the development proposals is consistent with the scale and function of that centre.</p> <p>The Council will expect applications for 'main town centre uses' to demonstrate that there are no available or suitable sites in a town centre, using a sequential approach, and consider the effect of the proposal on the vitality and viability of existing town centres.</p>	<p>As set out in the Retail Statement produced by CWP Planning in support of this Application, there is a supply of vacant units within the town centre, which are sequentially preferred to the provision on the Application Site. A reduction in commercial/ non-residential floor spaces, will have minimal, if not, a positive impact on the nearby town centre as a result of providing lower provision of 'out-of-centre' alternatives, in lieu of which further housing will be provided which will increase the number of people in the area as potential customers and people spending money in the area.</p>	Retail Impact
Policy DMH 2 – Housing Mix	<p>This policy sets out that the Council will require the provision of a mix of housing units of difference sizes in schemes for residential development to reflect the Council's latest information on housing need.</p>	<p>The Application proposes the provision of a mix of unit types including 5no. duplexes (both 2-bedroom 4-person units) and 4no. apartments (1 x 1-bed 2-person; 1 x 2-bed 4-person and 2x 3-bed 5-person units).</p>	Housing Provision
Policy DMH 7 – Provision of Affordable Housing	<p>This policy requires that developments with the capacity to provide 10 or more units will be required to maximise the delivery of affordable housing, subject to viability this should be a minimum or 35% affordable for such sites.</p>	<p>The Application only includes 9no. units, as such it fall below the threshold for the requirement to provide affordable housing.</p>	Housing Provision
Policy DMHB 1 – Heritage Assets	<p>This policy sets out that development proposals are expected to avoid harm to the historic environment.</p>	<p>The impact arising from the development of the Assembly Buildings and the wider Old Vinyl Factory development has been assessed and deemed acceptable. The proposals of this Application will not alter the conclusions of the acceptability of the impact on heritage assets as the proposals are located internally within the existing buildings.</p>	Heritage

Policy	Summary	Assessment of Proposed Development	Compliance
Policy DMHB 2 – Listed Buildings	This policy sets out that development proposals which are considered detrimental to the setting of a Listed Building.	The impact arising from the development of the Assembly Buildings and the wider Old Vinyl Factory development has been assessed and deemed acceptable. The proposals of this Application will not alter the conclusions of the acceptability of the impact on heritage assets as the proposals are located internally within the existing buildings.	Heritage
Policy DMHB 11 – Design of New Development	<p>This policy requires that all development will be required to be designed to the highest standards and should not adversely affect amenity, daylight and sunlight or adjacent properties and open space.</p> <p>Development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste.</p>	The existing buildings was deemed to be designed to an acceptably high quality within the relevant planning permission. The proposals of this Application take a design approach which is reflective of the existing building, and as such is deemed acceptable.	Design, Appearance and Layout
Policy DMHB 12 – Streets and Public Realm	This policy sets out that development should be well integrated with the surrounding and accessible.	The proposals of this Application are all internal and within the existing building, as such, there are no proposals in regard to streets and public realm. However, the 9no. units will benefit from the high-quality streets and public realm already delivered as part of the wider Old Vinyl Factory Development.	Design, Appearance and Layout
Policy DMHB 13 – Shop Fronts	This policy sets out that in order to improve and maintain the quality of public realm, the design of shopfronts should be of high quality, taking into consideration the retention and maintenance of active frontages; the relationship between shop fronts and upper floors; the relationship with surrounding shop fronts and buildings; the use of appropriate materials; and the value of existing architectural and historical features.	The only changes to the existing shop fronts on Site is the additional of the ground floors of the proposed 5no. duplexes. These have been designed to maintain an active frontage in areas where shopfronts are proposed to be removed. The are in-keeping with the design of the overall building, and tie in with the upper floors.	Design, Appearance and Layout
Policy DMHB 14 – Trees and Landscaping	This policy sets out that all development will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.	The proposals of this Application are all internal and within the existing building, as such, there are no proposals in regard to trees and landscaping. However, the 9no. units will benefit from the high-quality streets and public realm already delivered as part of the wider Old Vinyl Factory Development.	Design, Appearance and Layout
Policy DMHB 15 – Planning for Safer Places	This policy sets out that the Council will require all new development to ensure safe and attractive public and private spaces by referring to the Council's latest guidance on Secured by Design principles.	The proposed units have been design to a safe standard which is reflective of the standards delivered within the existing building	Design, Appearance and Layout

Policy	Summary	Assessment of Proposed Development	Compliance
Policy DMHB 16 – Housing Standards	<p>This policy sets out that all housing development should have an adequate provision of internal space in order to provide an appropriate living environment. To achieve this, all residential development or conversions should meet or exceed the most up to date internal space standards.</p>	<p>The proposed units meet the adopted internal space standards.</p>	Design, Appearance and Layout
Policy DMHB 17 – Residential Density	<p>This policy requires that all new residential development should take account of the Residential Density Matrix. Developments will be expected to meet habitable rooms standards.</p>	<p>The Site is classified as a residential area with suburban character within 800m of a town centre. Accordingly, the required density set out in the Density Matrix for the Site is 150 – 330 habitable rooms per hectare and 50 – 110 units per hectare.</p>	Housing Delivery
Policy DMHB 18 – Private Outdoor Amenity Space	<p>This policy requires that all new residential development and conversions will be required to provide good quality and useable private outdoor amenity space in accordance with the identified standards</p> <p>Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres. The design, materials and height of any front boundary must be in keeping with the character of the area to ensure harmonisation with the existing street scene.</p>	<p>Private outdoor amenity space is provided in the form of inset balconies. These balconies are designed to the same standard of the existing building and as such are deemed acceptable.</p>	Design Appearance and Layout
Policy DMEI 2 – Reducing Carbon Emissions	<p>This policy sets out that all development is required to make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.</p> <p>Proposals which fail to take reasonable steps to achieve the required savings will be resisted. However, where it is clearly demonstrated that the targets cannot be met onsite, the Council may approve the application and seek an off-site contribution to make up for the shortfall.</p>	<p>The proposed units will adopt the same principles of carbon reduction that have been secured and delivered within the existing building and it is therefore deemed acceptable.</p>	Energy & Sustainability
Policy DMEI 9 – Management of Flood Risk	<p>This policy sets out that proposals that fail to make appropriate provision for flood risk mitigation, or which would increase the risk or consequences of flooding, will be refused.</p>	<p>A flood alleviation strategy has been approved and delivered as part of the Assembly Building scheme. The proposals of this Application will not increase flood risk due to the internal nature of the proposals.</p>	Flood Risk and Drainage

Policy	Summary	Assessment of Proposed Development	Compliance
Policy DMEI 10 – Water Management, Efficiency and Quality	<p>This policy sets out that all applications for all new build developments are required to include a drainage assessment demonstrating that appropriate sustainable drainage systems (SuDS) have been incorporated in accordance with the London Plan Hierarchy.</p> <p>Schemes for the use of SuDS must be accompanied by adequate arrangements for the management and maintenance of the measures used, with appropriate contributions made to the Council where necessary.</p> <p>Proposals that would fail to make adequate provision for the control and reduction of surface water run-off rates will be refused.</p> <p>All new development proposals will be required to include water efficiency measures, including the collection and reuse of rain water and grey water.</p> <p>All new residential development should demonstrate water usage rates of no more than 105 litres/person/day.</p> <p>All new development proposals will be required to demonstrate that there is sufficient capacity in the water and wastewater infrastructure network to support the proposed development.</p>	<p>A flood alleviation strategy has been approved and delivered as part of the Assembly Building scheme. The proposals of this Application will not increase flood risk due to the internal nature of the proposals.</p> <p>The proposed development will achieve the required water efficiency standard of a maximum of 105 litres per person per day. This can be secured via an appropriately worded condition.</p>	Flood Risk and Drainage Energy & Sustainability
Policy DMEI 12 – Development of Land Affected by Contamination	<p>This policy sets out that proposals for development on potentially contaminated sites will be expected to be accompanied by at least an initial study of the likely contaminants.</p> <p>Where initial studies reveal potentially harmful levels of contamination, either to human health or controlled waters and other environmental features, full intrusive ground investigations and remediation proposals will be expected prior to any approvals.</p> <p>In some instances, where remedial works relate to an agreed set of measures such as the management of ongoing remedial systems, or remediation of adjoining or other affected land, a S106 planning obligation will be sought.</p>	<p>The proposals of this Application are not impacted by contamination, for which an appropriate mitigation scheme was secured and delivered for the development of the existing building.</p>	Contamination

Policy	Summary	Assessment of Proposed Development	Compliance
Policy DMEI 14 – Air Quality	<p>This policy sets out that Development proposals should demonstrate appropriate reductions in emissions to sustain compliance with and contribute towards meeting EU limit values and national air quality objectives for pollutants.</p> <p>Development should, as a minimum, be 'air quality neutral', provide sufficient mitigation against unacceptable levels of air pollution and actively contribute to the improvement of air quality.</p>	<p>It is envisaged that there will be no deterioration in local air quality levels resulting from the proposals, which do not include any substantial increase in likely trip generation compared to the existing development, as there is only 4no. additional parking spaces proposed.</p>	Air Quality
Policy DMCI 3 – Public Open Space Provision	<p>This policy sets out that public open space will be protected and enhanced.</p>	<p>No open space or informal recreation provision is proposed within this Application. Instead, it is envisaged that the proposed 9no. units will benefit from the existing public realm in the area as well as any further public realm which is proposed within committed developments.</p>	Design, Appearance and Layout
Policy DMT 1 – Managing Transport Impacts	<p>This policy sets out that development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner.</p> <p>Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds.</p>	<p>The proposed development will not cause any detrimental highways impact as there is only a minimal increase in private car trips generated due to the minor addition of 4no. parking spaces.</p>	Access, Highways and Parking
Policy DMT 2 – Highways Impacts	<p>This policy requires development proposals to ensure that safe and efficient vehicular access to the highway network is provided, that the development does not contribute to the deterioration of air quality, safe, secure and convenient access and facilities is provided for pedestrians and cyclists, impacts on local amenity and congestion are minimise and there are suitable mitigation measures in place to address any traffic impacts.</p>	<p>The proposed development will not cause any detrimental highways impact as there is only a minimal increase in private car trips generated due to the minor addition of 4no. parking spaces.</p> <p>Cycle parking will be provided for the 9no. additional units, which will also benefit from the high-quality public realm and connectivity of the wider Site into Hayes Town Centre.</p>	Access, Highways and Parking
Policy DMT 5 – Pedestrians and Cyclists	<p>This policy states that development proposals will be required to ensure that safe, direct and inclusive access for pedestrians and cyclists is provided on the site connecting it to the wider network.</p>	<p>Cycle parking will be provided for the 9no. additional units, which will also benefit from the high-quality public realm and connectivity of the wider Site into Hayes Town Centre.</p>	Access, Highways and Parking

Policy	Summary	Assessment of Proposed Development	Compliance
Policy DMT 6 – Vehicle Parking	<p>This policy sets out that development proposals will be required to accord with the adopted parking standards. Deviance from these standards may be agreed when this would not lead to a deleterious impact on street parking provision, congestion and local amenity; and/or a transport appraisal or travel plan has been approved and parking provision is in accordance with its recommendations.</p> <p>All car parks will also be required to provide conveniently located parking for those with disabilities.</p>	<p>The majority of increase demand for parking spaces can be absorbed in the existing provision. However, the proposals also include an additional 4no. parking spaces which will assist in meeting the uplifted demand.</p>	Access, Highways and Parking
The London Plan 2021			
Policy GG 2 – Making the best use of land	<p>This policy sets out that in order to create successful sustainable mixed-use places that make the best use of land, development proposals must - enable the development of brownfield land; prioritise well connected sites; explore the potential to intensify land; apply a design-led approach to optimising the use of land; protect and enhance open spaces; plan for good local walking, cycling and public transport connections; and maximise the opportunities to use infrastructure assets.</p>	<p>The proposals of this Application seek to provide 9no. residential units, in lieu of surplus commercial/ non-residential floor space. This means that 9no. new home can be provided, whilst maintaining some provision for commercial/ non-residential floor space.</p>	Housing Delivery
Policy SD 6 – Town centres and high streets	<p>This policy sets out that the vitality and viability of London's town centres should be promoted and enhanced.</p>	<p>As set out in the Retail Statement produced by CWP Planning in support of this Application, there is a supply of vacant units within the town centre, which are sequentially preferred to the provision on the Application Site. A reduction in commercial/ non-residential floor spaces, will have minimal, if not, a positive impact on the nearby town centre as a result of providing lower provision of 'out-of-centre' alternatives, in lieu of which further housing will be provided which will increase the number of people in the area as potential customers and people spending money in the area.</p>	Retail Impact
Policy D 3 – Optimising site capacity through the design-led approach	<p>This policy sets out that all development must make the best use of land by following a design-led approach that optimises the capacity of the site, including site allocation.</p> <p>Higher density development should generally be promoted in location that are well connected to jobs, services, infrastructure and amenities by public transport, walking or cycling.</p> <p>The policy also sets out various criteria around form, layout, experience, quality and character which developments seeking to achieve optimal density should adhere to.</p>	<p>The proposals of this Application seek to provide 9no. residential units, in lieu of surplus commercial/ non-residential floor space. This means that 9no. new home can be provided, whilst maintaining some provision for commercial/ non-residential floor space.</p>	Housing Delivery

Policy	Summary	Assessment of Proposed Development	Compliance
Policy D 4 – Delivering good design	<p>This policy requires that Design and Access Statements are submitted with proposals, and should demonstrate how the proposals meet the design requirements set out in the London Plan.</p> <p>The policy requires boroughs to thoroughly scrutinise the design of the development proposals. Development proposals referable to the Mayor must have undergone at least 1 design review early on in their preparation prior to an application being made.</p> <p>The policy also sets out various criterium for ensuring the design quality of development is retained through to completion.</p>	<p>The existing buildings was deemed to be designed to an acceptably high quality within the relevant planning permission. The proposals of this Application take a design approach which is reflective of the existing building, and as such is deemed acceptable.</p>	Design, Appearance and Layout
Policy D 5 – Inclusive design	<p>This policy requires that development proposals achieve the highest level of accessible and inclusive design by: taking account of London's diverse population; providing high quality people focused spaces; ensuring areas can be accessed and used easily and ensuring designs incorporate safe and dignified emergency evacuation for all building users.</p>	<p>The existing buildings was deemed to be designed to an acceptably high quality, including accessibility, within the relevant planning permission. The proposals of this Application take a design approach which is reflective of the existing building, and as such is deemed acceptable.</p> <p>All units will be design to comply with part M of the Building Regulations.</p>	Design, Appearance and Layout
Policy D 6 – Housing quality and standards	<p>This policy requires that housing development is of a high quality and provides adequately-sized rooms.</p> <p>Housing development should also seek to maximise the provision of dual aspect units and normally avoid the provision of single aspect dwellings, which should only be considered where it is deemed the more appropriate design solutions to meet the requirements of Part B in Policy D3.</p> <p>The design of developments should provide sufficient daylight and sunlight to new and surrounding housing.</p> <p>Housing should be design to provide adequate and easily accessible storage space for the collection of dry recyclables.</p> <p>Housing is also required to meet the minimum spaces standards set out at table 3.1. Where there are no higher local standards in the Borough's Development Plan Documents, a minimum of 5sqm of private outdoor space should be provided for 1-2 person dwelling and an extra 1sqm should be provided per additional occupant.</p>	<p>The existing buildings was deemed to be designed to an acceptably high quality within the relevant planning permission. The proposals of this Application take a design approach which is reflective of the existing building, and as such is deemed acceptable.</p>	Design, Appearance and Layout

Policy	Summary	Assessment of Proposed Development	Compliance
Policy D 7 – Accessible housing	This policy requires that at least 10% of dwellings meet Building Regulation requirement M4(3) 'wheelchair user dwellings'. All other dwellings meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings.'	<p>The existing buildings was deemed to be designed to an acceptably high quality, including accessibility, within the relevant planning permission. The proposals of this Application take a design approach which is reflective of the existing building, and as such is deemed acceptable.</p> <p>All units will be design to comply with part M of the Building Regulations.</p>	Design, Appearance and Layout
Policy D 8 – Public Realm	This policy requires development proposals to encourage and explore opportunities to create new well designed public realm where appropriate.	No open space or informal recreation provision is proposed within this Application. Instead, it is envisaged that the proposed 9no. units will benefit from the existing public realm in the area as well as any further public realm which is proposed within committed developments.	Design, Appearance and Layout
Policy D 14 – Noise	This policy require residential and other non-aviation development to manage noise by avoiding significant adverse noise impacts on health and quality of life; reflecting the Agent of Change principle set out in Policy D13; mitigating and minimising the existing and potential adverse impact of noise on, from, within, as a result of, or in the vicinity to the development without placing unreasonable restrictions on existing noise generating development; and improving and enhancing the acoustic environment and promoting appropriate soundscapes.	The noise mitigations measure secured within the existing building will be implemented within the proposals of these 9no. units, including the need to achieve the defined noise reduction. An appropriately worded condition may be included should planning permission be granted for this Application, to secure such measures.	Noise
Policy H 1 – Increasing housing supply	<p>This policy sets the ten-year housing delivery targets for Boroughs, which for Hillingdon is 10,830.</p> <p>The policy encourages boroughs to proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.</p> <p>The policy also sets out that on sites that are allocated for residential and mixed-use development, there is a general presumption against single use low-density retail and leisure parks.</p>	The proposals include the provision of 9no. homes to contribute towards this identified need for homes within the borough.	Housing Delivery
Policy H 4 – Delivering affordable housing	<p>This policy sets out the strategic London affordable housing target for 50% of all new homes delivered across the city.</p> <p>The policy requires that affordable housing provision should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.</p>	The proposals only include 9no. dwellings, which would fall below the threshold to provide affordable housing set locally.	Housing Provision

Policy	Summary	Assessment of Proposed Development	Compliance
Policy H 10 – Housing size mix	<p>This policy requires that schemes should generally consist of a range of unit sizes. This should be determined on the basis of robust local evidence and where this is not available, the range of housing need set out in the 2017 London Strategic Housing Market Assessment; the requirement to deliver mixed and inclusive neighbourhoods; the need to deliver a range of unit types at different price points; the mix of uses in the scheme; the range of tenures in the scheme; the nature and location of the site; the aim to optimise housing potential on sites; the ability of new development to reduce pressure on conversion and sub-division and amalgamation of existing stock; and the need for additional family housing.</p>	<p>The Application proposes the provision of a mix of unit types including 5no. duplexes (both 2-bedroom 4-person units) and 4no. apartments (1 x 1-bed 2-person; 1 x 2-bed 4-person and 2x 3-bed 5-person units).</p>	Housing Provision
Policy HC 1 – Heritage conservation and growth	<p>This policy sets out that development proposals affecting heritage assets, and their settings, should conserve their significance.</p> <p>Development proposals should avoid harm and identify enhancement opportunities by integrated heritage considerations early on in the design process.</p> <p>Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation.</p>	<p>The impact arising from the development of the Assembly Buildings and the wider Old Vinyl Factory development has been assessed and deemed acceptable. The proposals of this Application will not alter the conclusions of the acceptability of the impact on heritage assets as the proposals are located internally within the existing buildings.</p>	Heritage
Policy G 6 – Biodiversity and access to nature	<p>This policy sets out that development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.</p>	<p>Due to the internal nature of the proposals, there will be no impact on biodiversity and geological conservation.</p>	Ecological and Arboricultural Matters

Policy	Summary	Assessment of Proposed Development	Compliance
Policy SI 1 – Improving air quality	<p>This policy requires development proposals to ensure that they do not lead to further deterioration of existing poor air quality; create any new areas that exceed air quality limits; and create unacceptable risk of high levels of exposure to poor air quality.</p> <p>Development proposals must be at least Air Quality Neutral and should use design solutions to prevent or minimise increased exposure to existing air pollution and make provision to address local air quality problems. All major developments must submit an Air Quality Assessment.</p> <p>Development proposals in Air Quality Focus Areas or that are likely to be used by large numbers of people should demonstrate that design measures have been used to minimise exposure.</p> <p>Development proposals should ensure that where emissions need to be reduced to meet the requirements of Air Quality Neutral or to make the impact of development on local air quality acceptable, this is done on-site. Where it can be demonstrated that emissions cannot be further reduced by on-site measures, off-site measures to improve local air quality may be acceptable, provided that equivalent air quality benefits can be demonstrated within the area affected by the development.</p>	<p>It is envisaged that there will be no deterioration in local air quality levels resulting from the proposals, which do not include any substantial increase in likely trip generation compared to the existing development, as there is only 4no. additional parking spaces proposed.</p>	Air Quality

Policy	Summary	Assessment of Proposed Development	Compliance
Policy SI 2 – Minimising greenhouse gas emissions	<p>This policy requires that all major developments should be net zero carbon using the be lean, be clean, be green and be seen hierarchy.</p> <p>Major development proposals are required to include a detailed energy strategy to demonstrate how the zero-carbon target will be met within the framework of the energy hierarchy.</p> <p>A minimum on site reduction of at least 35% beyond Building Regulations is required for major development. Residential development should achieve 10% and non-residential development should achieve 15% through energy efficient measures.</p> <p>Shortfall can be achieved through cash in lieu contribution to the borough's carbon offset fund or off-site provided that an alternative proposal is identified and delivery is certain.</p> <p>Major development proposals should calculate and minimise carbon emissions from any other part of the development, including plant or equipment, that are not covered by Buildings Regulations.</p> <p>Development proposals which are referable to the Mayor should calculate whole life-cycle carbon emissions through a nationally recognised Whole Life-Cycle Carbon Emissions Assessment and demonstrate actions taken to reduce life-cycle carbon emissions.</p>	The proposed units will adopt the same principles of carbon reduction that has been secured and delivered within the existing building and it therefore deemed acceptable.	Energy & Sustainability
Policy SI 3 – Energy infrastructure	<p>This policy requires that development proposals which are within Heat Network Priority Areas should have a communal low-temperature heating system.</p> <p>Heat networks should achieve good practice design and specification standards for primary, secondary and tertiary systems comparable to those set out in the CIBSE/ADE Code of Practice CP1 or equivalent.</p>	The proposed 9no. units will adopt the same energy strategy agreed and implemented for the existing building	Energy and Sustainability
Policy SI 4 – Managing heat risk	This policy requires that major development proposals should demonstrate through an energy strategy how they will reduce the potential for internal overheating and reliance on air conditioning systems.	The proposed 9no. units will adopt the same energy strategy agreed and implemented for the existing building	Energy and Sustainability

Policy	Summary	Assessment of Proposed Development	Compliance
Policy SI 5 – Water infrastructure	This policy sets out that development proposals should minimise the use of water in line with the Operational Requirements of the Building Regulations. Proposals should incorporate measures such as smart metering, water saving and recycling measures.	The proposed development will achieve the required water efficiency standard of a maximum of 105 litres per person per day. This can be secured via an appropriately worded condition.	Energy & Sustainability
Policy SI 12 – Flood risk management	This policy requires that development proposals should ensure that flood risk is minimised and mitigated, and that residual risk addressed. This should include, where possible, making space for water and aiming for development to be set back from the banks of watercourses.	A flood alleviation strategy has been approved and delivered as part of the Assembly Building scheme. The proposals of this Application will not increase flood risk due to the internal nature of the proposals.	Flood Risk and Drainage
Policy SI 13 – Sustainable drainage	<p>This policy sets out that development proposals should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible. There should also be a preference of green over grey features.</p> <p>Development proposals for impermeable surfacing should normally be resisted unless they can be shown to be avoidable, including on small surfaces such as front gardens and driveways.</p> <p>Drainage should be designed and implemented in ways that promote multiple benefits including increased water use efficiency, improved water quality and enhance biodiversity, urban greening amenity and recreation.</p>	A flood alleviation strategy has been approved and delivered as part of the Assembly Building scheme. The proposals of this Application will not increase flood risk due to the internal nature of the proposals.	Flood Risk and Drainage
Policy T 3 – Transport capacity, connectivity and safeguarding	This policy sets out that development proposals should support capacity, connectivity and other improvements to the bus network and ensure it can operate efficiently to, from and within developments, giving priority to buses and supporting infrastructure as needed.	The proposed development will not cause any detrimental highways impact as there is only a minimal increase in private car trips generated due to the minor addition of 4no. parking spaces.	Access, Highways and Parking

Policy	Summary	Assessment of Proposed Development	Compliance
Policy T 4 – Assessing and mitigating transport impacts	<p>This policy sets out that proposals should reflect and be integrated with current and planned transport access, capacity and connectivity.</p> <p>Where required in national or local guidance, transport assessment/statements should be submitted with planning applications.</p> <p>Travel plans, parking design and management plans, construction logistics plan and delivery and servicing plans will be required having regard to Transport for London guidance.</p> <p>Where appropriate, mitigation, through direct provision or contributions will be required to address adverse transport impacts that are identified.</p> <p>The cumulative impacts of development on public transport and road networks should be taken into account and mitigated.</p> <p>Development proposals should not increase road danger.</p>	<p>The proposed development will not cause any detrimental highways impact as there is only a minimal increase in private car trips generated due to the minor addition of 4no. parking spaces.</p> <p>Cycle parking will be provided for the 9no. additional units, which will also benefit from the high-quality public realm and connectivity of the wider Site into Hayes Town Centre.</p>	Access, Highways and Parking
Policy T 5 – Cycling	<p>This policy sets out that proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle.</p> <p>Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles.</p> <p>Where it is not possible to provide a policy compliant level of parking, an alternative solution should be sought.</p> <p>Table 10.2 sets out the relevant parking standards required to be met.</p>	<p>Cycle parking will be provided for the 9no. additional units, which will also benefit from the high-quality public realm and connectivity of the wider Site into Hayes Town Centre.</p>	Access, Highways and Parking

Policy	Summary	Assessment of Proposed Development	Compliance
Policy T 6 – Car parking	<p>This policy sets out that proposals should help remove barriers to cycling and create a healthy environment in which people choose to cycle.</p> <p>Cycle parking should be designed and laid out in accordance with the guidance contained in the London Cycling Design Standards. Development proposals should demonstrate how cycle parking facilities will cater for larger cycles, including adapted cycles.</p> <p>Where it is not possible to provide a policy compliant level of parking, an alternative solution should be sought.</p> <p>Table 10.2 sets out the relevant parking standards required to be met.</p>	<p>The majority of the increase demand for car parking can be absorbed in the existing provision, however, the proposals also include 4no. additional spaces which will also cater for the uplifted demand.</p>	Access, Highways and Parking
The NPPF 2023			
Paragraph 8	<p>This paragraph sets out the three overarching objectives to achieve sustainable development, namely; an economic, a social and an environmental objective.</p>	<p>The Application Site has recently been redeveloped to provide a mixed-use, residential-led scheme, which is deemed to clearly establish the principle of development on the Site.</p>	Principle of Development
Paragraph 11	<p>This paragraph sets out the presumption in favour of sustainable development.</p> <p>For decision-taking, this means that development proposals that accord with an up-to-date plan will be approved without delay.</p> <p>Where there are no relevant development plan policies, or the most relevant policies are deemed out of date, planning permission will be granted unless the application of policies within the Framework provide clear reason for refusal; or any adverse impacts of doing so would significantly and demonstrably outweigh the benefits.</p>	<p>As the scheme is on a site where the principle of development is well established by a recently delivered development, the proposals of this Application seek to provide 9no. residential units, in lieu of surplus commercial/ non-residential floor space is deemed to be a sustainable approach to boosting the supply of homes set out in paragraph 60 of the NPPF.</p>	Principle of Development
Paragraph 38	<p>This paragraph sets out that Local Planning Authorities should approach decisions on proposed development in a positive and creative way. Decision makers at every level should seek to approve applications for sustainable development where possible.</p>	<p>The proposals have been creatively designed to include a provision of 9no. additional new homes, without detriment to commercial needs.</p>	Principle of Development
Paragraph 60	<p>This paragraph sets out how the framework supports the Government's objective of significantly boosting the supply of homes.</p>	<p>This Application seek to provide 9no. residential units, in lieu of surplus commercial/ non-residential floor space is deemed to be a sustainable approach to boosting the supply of homes set out in paragraph 60 of the NPPF.</p>	Principle of Development Housing Delivery

Policy	Summary	Assessment of Proposed Development	Compliance
Paragraph 81	This paragraph sets out that policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity.	As set out in the Retail Statement produced by CWP Planning in support of this Application, there is a supply of vacant units within the town centre, which are sequentially preferred to the provision on the Application Site. A reduction in commercial/ non-residential floor spaces, will have minimal, if not, a positive impact on the nearby town centre as a result of providing lower provision of 'out-of-centre' alternatives, in lieu of which further housing will be provided which will increase the number of people in the area as potential customers and people spending money in the area.	Retail Impact
Paragraph 83	This paragraph sets out that planning policies and decisions should recognise and address the specific locational requirements of different sectors.	As set out in the Retail Statement produced by CWP Planning in support of this Application, there is a supply of vacant units within the town centre, which are sequentially preferred to the provision on the Application Site. A reduction in commercial/ non-residential floor spaces, will have minimal, if not, a positive impact on the nearby town centre as a result of providing lower provision of 'out-of-centre' alternatives, in lieu of which further housing will be provided which will increase the number of people in the area as potential customers and people spending money in the area.	Retail Impact
Paragraph 86	This paragraph sets out that planning policies and decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation	As set out in the Retail Statement produced by CWP Planning in support of this Application, there is a supply of vacant units within the town centre, which are sequentially preferred to the provision on the Application Site. A reduction in commercial/ non-residential floor spaces, will have minimal, if not, a positive impact on the nearby town centre as a result of providing lower provision of 'out-of-centre' alternatives, in lieu of which further housing will be provided which will increase the number of people in the area as potential customers and people spending money in the area.	Retail Impact
Paragraph 87	This paragraph requires that local planning authorities should apply a sequential test to planning applications for main town centre uses which are neither in an existing centre nor in accordance with an up-to-date plan.	As set out in the Retail Statement produced by CWP Planning in support of this Application, there is a supply of vacant units within the town centre, which are sequentially preferred to the provision on the Application Site. A reduction in commercial/ non-residential floor spaces, will have minimal, if not, a positive impact on the nearby town centre as a result of providing lower provision of 'out-of-centre' alternatives, in lieu of which further housing will be provided which will increase the number of people in the area as potential customers and people spending money in the area.	Retail Impact

Policy	Summary	Assessment of Proposed Development	Compliance
Paragraph 88	This paragraph sets out that, when considering edge of centre and out of centre proposals, preference should be given to accessible sites which are well connected to the town centre.	As set out in the Retail Statement produced by CWP Planning in support of this Application, there is a supply of vacant units within the town centre, which are sequentially preferred to the provision on the Application Site. A reduction in commercial/ non-residential floor spaces, will have minimal, if not, a positive impact on the nearby town centre as a result of providing lower provision of 'out-of-centre' alternatives, in lieu of which further housing will be provided which will increase the number of people in the area as potential customers and people spending money in the area.	Retail Impact
Paragraph 92	This paragraph sets out that planning policies and decisions should aim to achieve healthy, inclusive, and safe places.	The proposals of this Application are all internal and within the existing building, as such, there are no proposals in regard to streets and public realm. However, the 9no. units will benefit from the high-quality streets and public realm already delivered as part of the wider Old Vinyl Factory Development.	Design, Appearance and Layout
Paragraph 98	Access to a network of high-quality open spaces and opportunities for support and physical activity is important for the health and well-being of communities, and can deliver wider benefits from nature and support efforts to address climate change.	No open space or informal recreation provision is proposed within this Application. Instead, it is envisaged that the proposed 9no. units will benefit from the existing public realm in the area as well as any further public realm which is proposed within committed developments.	Design, Appearance and Layout
Paragraph 111	This paragraph sets out that development should only be prevent or refused on highway ground if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.	The proposed development will not cause any detrimental highways impact as there is only a minimal increase in private car trips generated due to the minor addition of 4no. parking spaces.	Access, Highways and Parking
Paragraph 112	This paragraph sets out that applications should give priority first to pedestrian and cycle movements and facilitating access to public transport. Developments should also address the needs of people with disability and create places which are safe, secure and attractive. Developments should also allow for efficient delivery of goods and be designed to accommodate EV charging points.	The proposed development will not cause any detrimental highways impact as there is only a minimal increase in private car trips generated due to the minor addition of 4no. parking spaces. Cycle parking will be provided for the 9no. additional units, which will also benefit from the high-quality public realm and connectivity of the wider Site into Hayes Town Centre.	Access, Highways and Parking
Paragraph 119	This paragraph sets out that decisions should promote an effective use of land in meeting the need for homes and other uses, while safeguarding and improving the environment and ensuring healthy and safe living conditions, including on brownfield land.	As the scheme is on a site where the principle of development is well established by a recently delivered development, the proposals of this Application seek to provide 9no. residential units, in lieu of surplus commercial/ non-residential floor space is deemed to be a sustainable approach to boosting the supply of homes set out in paragraph 60 of the NPPF.	Principle of Development Housing Delivery

Policy	Summary	Assessment of Proposed Development	Compliance
Paragraph 120	This paragraph sets out that planning decisions should encourage multiple benefits from the development of land; recognise that some undeveloped land can perform many functions; give substantial weight to the value of using suitable brownfield land within settlements for housing; promote and support the development of under-utilised land and buildings, especially if it contributes to housing delivery; and support opportunities to use airspace above existing residential and commercial premises for new homes.	As the scheme is on a site where the principle of development is well established by a recently delivered development, the proposals of this Application seek to provide 9no. residential units, in lieu of surplus commercial/non-residential floor space is deemed to be a sustainable approach to boosting the supply of homes set out in paragraph 60 of the NPPF.	Principle of Development Housing Delivery
Paragraph 123	This paragraph sets out that local planning authorities should also take a positive approach to applications for alternative uses of land which is currently developed but not allocated for a specific purpose in plans	As the scheme is on a site where the principle of development is well established by a recently delivered development, the proposals of this Application seek to provide 9no. residential units, in lieu of surplus commercial/non-residential floor space is deemed to be a sustainable approach to boosting the supply of homes set out in paragraph 60 of the NPPF.	Principle of Development
Paragraph 126	This paragraph sets out that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve.	The existing buildings was deemed to be designed to an acceptably high quality within the relevant planning permission. The proposals of this Application take a design approach which is reflective of the existing building, and as such is deemed acceptable.	Design, Appearance and Layout
Paragraph 130	This paragraph sets out how policies and decisions can achieve high quality design setting out a number of general principles.	The existing buildings was deemed to be designed to an acceptably high quality within the relevant planning permission. The proposals of this Application take a design approach which is reflective of the existing building, and as such is deemed acceptable.	Design, Appearance and Layout
Paragraph 159	This paragraph sets out that inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk.	A flood alleviation strategy has been approved and delivered as part of the Assembly Building scheme. The proposals of this Application will not increase flood risk due to the internal nature of the proposals.	Flood Risk and Drainage
Paragraph 161	This paragraph sets out all plans should apply a sequential, risk-based approach to the location of development in regard to flood risk.	A flood alleviation strategy has been approved and delivered as part of the Assembly Building scheme. The proposals of this Application will not increase flood risk due to the internal nature of the proposals.	Flood Risk and Drainage
Paragraph 174	This paragraph sets out the ways in which policies and decisions should seek to contribute to and enhance the natural and local environment.	Due to the internal nature of the proposals, there will be no impact on biodiversity and geological conservation.	Ecological and Arboricultural Matters
Paragraph 183	This paragraph sets out that planning decisions should ensure that a site is suitable for its proposed use, taking account of ground conditions and any risks arising from land instability and contamination.	The proposals of this Application are not impacted by contamination, for which an appropriate mitigation scheme was secured and delivered for the development of the existing building.	Contamination

Policy	Summary	Assessment of Proposed Development	Compliance
Paragraph 184	This paragraph sets out that where a site is affected by contamination or land stability issues, responsibility for securing a safe development rests with the developer and/or landowner.	The proposals of this Application are not impacted by contamination, for which an appropriate mitigation scheme was secured and delivered for the development of the existing building.	Contamination
Paragraph 185	This paragraph sets out that planning policies and decisions should also ensure that new development is appropriate for its location taking into account the likely effects (including cumulative effects) of pollution on health, living conditions and the natural environment, as well as the potential sensitivity of the site or the wider area to impacts that could arise from the development.	The proposals of this Application are not impacted by contamination, for which an appropriate mitigation scheme was secured and delivered for the development of the existing building.	Contamination