

## **Planning and Affordable Housing Statement**

**Proposed change of use from 'Office' (Class E(g)(i)) and construction of roof extension to provide 121 'Residential' (Class C3) units, including residential amenities. Construction of an external roof terrace, alterations to elevations and provision of rear external area for private gardens and a shared residents' terrace. Further associated provision of refuse storage, hard and soft landscaping and associated development.**

Date of report: March 2026

**The Record Store, Pressing Lane, Hayes, UB3 1DH**

PREPARED FOR  
Spectre (Hayes)  
Limited

savills

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## Document History

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# 1. Introduction

- 1.1 This Statement has been prepared by Savills (UK) Limited, on behalf of Spectre (Hayes) Limited (the '**Applicant**'), in relation to a planning application submitted in respect of proposed development at the Record Store in Hayes (the '**Site**'). This Statement is intended to assist the Local Planning Authority's ('**LPA**') consideration of the development's accordance with local and national planning policies and all other material considerations.
- 1.2 The application seeks full planning permission for the change of use from office (Class E) to residential (Class C3), construction of a roof extension and terrace and associated works to the façade and external areas of the Site (the '**Proposed Development**'). The proposals will facilitate the occupation of longstanding vacant floorspace to provide high quality housing within an increasingly residential area, delivering sustainable development and providing housing on brownfield land.
- 1.3 This assessment has been undertaken in response to local and national planning policy requirements and should be read in conjunction with other supporting documents submitted with the planning application.

## Structure of this Statement

- 1.4 In order to comprehensively assess the Proposed Development against the relevant planning policies, the remaining sections of this Statement are structured as follows:

**Section 2.0** Site Context and Planning History

**Section 3.0** The Proposed Development

**Section 4.0** Review of Relevant Planning Policy

**Section 5.0** Assessment of the Proposed Development

**Section 6.0** Overview of Public Benefits

**Section 7.0** Summary and Conclusions

## 2. Site Context and Planning History

### The Site and Surroundings

- 2.1 The Site comprises the Record Store, an inter-war industrial building located on Pressing Lane within the London Borough of Hillingdon. The building originally formed part of the wider EMI manufacturing complex, designed by Wallis, Gilbert & Partners and was completed in 1972. Later, the building became part of the vinyl production process.
- 2.2 The Site lies within the Botwell: EMI Conservation Area (REF: CA-16), the Record Store itself is a locally listed non-designated heritage asset and is a positive contributor to the significance of the Conservation Area.
- 2.3 The Site forms part of the wider regeneration of the Old Vinyl Factory campus in Hayes, an area of considerable historic and cultural significance as the former headquarters of EMI's vinyl record production.



*Figure 1 - The Record Store (redline) within the Old Vinyl Factory Masterplan*

- 2.4 The floorspace at the Site is used as an 'office' within Class E(g)(i). It is mostly vacant with approximately 90% of the floorspace unoccupied since its comprehensive refurbishment in 2015.<sup>1</sup> The Site was temporarily used for a vaccination centre during the Covid-19 pandemic

<sup>1</sup> Planning Permission: 59872/APP/2014/1041.

- 2.5 The Record Store extends to approximately 0.21ha and accommodates 10,105 sqm (GIA) of floorspace. The building is arranged over six storeys, with a distinctive wedge-shaped footprint and the sixth floor only included enclosed plant.
- 2.6 The Site comprises brownfield land and forms part of the Hayes Housing Zone and the wider Heathrow/Elizabeth Line West Opportunity Area. These combined designations identify Hayes as a strategically significant location for residential development.
- 2.7 Access to the Site is taken from Pressing Lane, which connects to Gramophone Lane to the west and Powerhouse Lane to the east. There is no on-Site car parking, though the building retains rights to use five car parking spaces immediately to the west.
- 2.8 The Site is surrounded by a mix of residential and commercial uses. To the north and east are recently completed residential buildings fronting Pressing Lane. To the west lies the Old Vinyl Factory building, with the Shipping Building further beyond, both also forming part of the historic EMI complex. The Site is bound by the east-west rail corridor to the south.
- 2.9 The Site benefits from good access to public transport, with Hayes & Harlington Station approximately 650m, or an 8-minute walk to the east. The nearest bus stop is located at Clarendon Road, approximately 450m from the Site.
- 2.10 The surrounding area is well served by local facilities such as schools, supermarkets and a range of other amenities including cafes, restaurants, pharmacies and medical facilities located within walking distance.
- 2.11 The Site is located wholly within Flood Zone 1 as defined by the Environment Agency and is therefore recognised to have a low probability of flooding, the Site is not affected by surface water flooding. The Site is located within the Hillingdon Air Quality Management Area ('AQMA').

### Planning History

- 2.12 Following a desktop based review of the London Borough of Hillingdon's planning system, the following recent (post-2010) applications are of relevance to the Site:
- On 21 May, 2014, planning permission was granted for "*External works to The Record Store building, including replacement windows and doors, new balustrades, new entrance canopies, vehicle barrier bollards, surfacing works, and temporary cycle parking stands.*" (App Ref: 59872/APP/2014/1041).
  - On 21 May, 2014, planning permission was granted for "*Roof top works to The Record Store building, consisting of the installation of a new lift.*" (App Ref: 59872/APP/2014/1042).

- On 27 May, 2015, planning permission was granted for “*Non-material amendments to the external appearance of the Record Store Building, including replacement windows and doors, the colour of rainwater down pipes (condition 3), and amend Specification extracts.*” (App Ref: 59872/APP/2015/1577).
- On 7 August 2015, planning permission was granted for “*Amendments to the public realm and landscaping strategy surrounding the Record Store.*” (App Ref: 59872/APP/2015/2189).

### 3. The Proposed Development

3.1 The Proposed Development involves converting the existing Office (Class E(g)) space into Residential (Class C3), to create 121 new residential units with a mix of 1,2 and 3 bed apartments. As part of the proposal, a single-storey roof extension will be constructed providing circa 1,328 sqm (GIA).

3.2 The description of development is:

*“Proposed change of use from ‘Office’ (Class E(g)(i)) and construction of roof extension to provide 121 ‘Residential’ (Class C3) units, including residential amenities. Construction of an external roof terrace, alterations to elevations and provision of rear external area for private gardens and a shared residents’ terrace. Further associated provision of refuse storage, hard and soft landscaping and associated development. “*

3.3 Residents will benefit from ancillary communal amenities, including a lounge area, co-working facilities, a gym studio and shared rooftop terrace. To facilitate the internal works and conversion of the floor space, the project includes modifications to the external façade and alterations to the building’s elevations, such as the addition of infill panels and changes to the existing entrances.

3.4 The proposed housing mix and unit count is detailed in Table 1 below.

| Proposed Unit Count |       |       |            |       |
|---------------------|-------|-------|------------|-------|
|                     | Count | Total | % of Total | Unit  |
| 1B1P                | 7     | 75    | 6%         | 1 Bed |
| 1B2P                | 64    |       | 62%        |       |
| 1B2P M4(3)          | 11    |       |            |       |
| 2B4P                | 34    | 34    | 28%        | 2 Bed |
| 3B5P                | 0     | 5     | 4%         | 3 Bed |
| 3B6P                | 5     |       |            |       |
| <b>Total Units</b>  | 121   |       |            |       |

Table 1 – Proposed Housing Mix & Unit Count

3.5 Specifications for each unit type are as follows:

- Typical 1B2P Units will measure 56 sqm, will features tall ceilings of 3.7m and large windows. The lofts will feature a warehouse aesthetic with Crittall style windows and exposed concrete soffits.

- Typical 2B4P Units will measure 100 sqm, will feature tall ceilings of 4.1m and large windows and will comprise a mezzanine. The lofts will feature a warehouse aesthetic with Crittall style windows and exposed concrete soffits.
- Typical 3B6P Units will measure 101 sqm, will feature a dual aspect form with deep floorplates which allows for generous 3 bedroom units. The lofts will feature a warehouse aesthetic with Crittall style windows and exposed concrete soffits.

- 3.6 The proposal includes a residents' amenity space at ground floor including a co-working lounge, gym with fitness studio, reception area, private meeting rooms, toilet facilities (including accessible WC), residents' lounge with external terrace and facilities such as lockers and a management office.
- 3.7 The proposals include a shared rooftop terrace which is designed to offer a variety of amenities and activities for residents including dedicated play areas for children, areas for community gardening and dining tables to provide flexible options for socialising. Additionally, a multi-purpose event space is available for residents to host private functions or community events.
- 3.8 The proposal includes ground floor private gardens for residents of the ground floor apartments, which will integrate a mixture of soft and hard landscaping with informal seating and planters.

## Pre-Application Advice & Community Engagement

### Pre-Application

- 3.9 Extensive pre-application discussions have taken place with the London Borough of Hillingdon across four formal pre-application requests submitted by the Applicant (Refs: 59872/PRC/2024/131, 59872/PRC/2025/95, 59872/PRC/2025/153 and 59872/PRC/2025/190). The aim of these meetings was to engage in open dialogue with the LPA. The table below summarizes the pre-application responses at each stage.

| Pre-Application Round | Response                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 01                    | <ul style="list-style-type: none"> <li>• The principle of creating additional homes in this location is broadly supported in principle, however, the Applicant should justify the loss of office space and demonstrate that the homes would have a high-quality design.</li> <li>• The Council has concerns regarding the unacceptably elevated level of proposed single-aspect residential units.</li> </ul> |



|    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|    | <ul style="list-style-type: none"> <li>• The Council also has concerns regarding the proposed dimension of the dwellings.</li> <li>• There were further concerns regarding the ground floor units with no private amenity or defensible space, with their habitable room windows directly addressing a communal space, railway and likely tall boundary wall.</li> <li>• The Council will expect new development proposals to carefully consider layout and massing to ensure development does not result in an increased sense of enclosure and loss of outlook.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                           |
| 02 | <ul style="list-style-type: none"> <li>• Whilst the LPA remain broadly supportive of the upward extension through the construction of an additional floor; Officers remain unconvinced by its design. The choice of material including specification and colour need to be carefully considered.</li> <li>• A further point of concern is how the rhythm of windows and the frame relates to the floors beneath it.</li> <li>• The applicant must demonstrate that appropriate, daylight, sunlight, outlook can be provided.</li> <li>• The Council would not support the limited proposed amenity space and inadequate quality amenity space at ground floor for 123 residential homes.</li> <li>• The design of the ground floor is a concern as is the external space to the rear of the building.</li> </ul>                                                                                                                                                                                       |
| 03 | <ul style="list-style-type: none"> <li>• Where possible, further efforts should be made to align the external infill panels proposed for each floor of the building. Panelling in straight vertical lines would better integrate with the existing linear concrete beams which help define the building's façades.</li> <li>• Furthermore, the colour of the panels is considered to be at odds with the white concrete finish of the existing locally listed building. As such, further effort should be made to introduce similar materials to those existing or panels of similar colour.</li> <li>• The ground floor rear residential units would have poor outlook, given that they are only served by a rear facing window that provides short distance views.</li> <li>• The rear amenity spaces provided for the units are also considered to be of inadequate quality as residents using the space would be subjected to elevated levels of noise and vibration by passing trains.</li> </ul> |
| 04 | <ul style="list-style-type: none"> <li>• The removal of the external panels or the adoption of a darker colour would appear more in keeping with this design feature.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |

|  |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|  | <ul style="list-style-type: none"> <li>• The proposal for a resident's lounge to be located at the rear of the building is welcomed and would make best use of the external space to the rear.</li> <li>• The level of cycle parking should be revisited with a view to reducing the amount of cycle parking provision which could result in more space to improve the ground floor uses and layout.</li> <li>• The community use space and the cafe offering are likely to be disused or underutilised spaces.</li> <li>• The bin storage is also sporadic, but this may be due to operational requirements. The external bins near the resident's lounge at the rear of the building are less attractive given the likely poor odour emanating from the bins.</li> </ul> |
|--|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

3.10 The most recent round of pre-application feedback confirms that the principle of redevelopment is supported, with Officers acknowledging the marketing evidence demonstrating long-term vacancy and limited commercial demand despite the efforts to re-use the building for employment purposes.

3.11 Officers recognise that the design has continued to evolve positively and respects the Site's heritage context. The rooftop extension is also supported, with Officers requesting only minor refinements remain to ensure seamless integration of façade materials and detailing. Transport Officers have maintained their support for a car-free approach, given the Site's accessible location.

3.12 Most importantly, Officers have recognised the multitude of significant public benefits arising from the scheme. These include the long-term reuse of a vacant building, the delivery of new homes in an Opportunity Area, and the preservation of a valued locally listed asset.

### Community Involvement

3.13 As part of the pre-application process, the Applicant undertook a community engagement exercise to ensure that local residents, ward councillors and stakeholders were given early opportunities to understand and comment on the emerging proposals. The project team wrote to both of the elected Hayes Town ward councillors to seek an initial meeting to discuss the proposals prior to the exhibitions being held.

3.14 A dedicated consultation website and freephone information line were established to provide accessible channels for information and feedback, supported by proactive outreach including a newsletter mailed to 1,330 local households.

3.15 A public exhibition was held onsite at the Record Store on Wednesday 22 October 2025 between 2pm-7pm, enabling residents to view the proposals, speak directly with members of the project team, and provide both written and verbal comments. Eight local residents attended, and additional feedback was received through online forms, email and telephone. The consultation highlighted a

range of views, including broad support for the design approach and questions relating to local services, amenities and the wider Old Vinyl Factory context. All feedback received was reviewed by the project team and has informed the continued evolution of the scheme.

- 3.16 The applicant remains committed to ongoing engagement with the community as the project progresses, maintaining open communication channels and ensuring residents are kept informed throughout the planning process.

## 4. Review of Relevant Planning Policy

- 4.1 In accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004, any future revised application will be required to be determined in accordance with the Development Plan for that area, unless any material considerations indicate otherwise.
- 4.2 For the purposes of this application, the Development Plan for the Site comprises:
- The London Plan ('LP') (March 2021);
  - Local Plan Part 1: Strategic Policies (adopted November 2012) ('HLP1');
  - Local Plan Part 2: Development Management Policies (January 2020) ('HLP2'); and
  - Local Plan Part 2: Site Allocations (adopted January 2020).
- 4.3 Material considerations include: National Planning Policy Framework ('NPPF') (December 2024); Planning Practice Guidance ('PPG'); regional and local supplementary guidance / documents ('SPG/SPDs') including and any other site specific circumstances.

### National Planning Policy Framework

- 4.4 The NPPF was most recently updated in December 2024. The NPPF sets out the Government's planning policies for England and how these should be applied.
- 4.5 At the heart of the NPPF is a presumption in favour of sustainable development (Section 2, Paragraph 11). Sustainable development is defined as having three dimensions: social, economic and environmental and the NPPF outlines that the planning system should work towards them in mutually supportive ways.
- 4.6 Section 5 relates to delivering a sufficient supply of homes which recognises that to support the Government's objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed and that the overall aim should be to meet an area's identified housing need, including with an appropriate mix of housing types for the local community.
- 4.7 Section 8 of the NPPF relates to promoting healthy and safe communities and states that policies and decisions should aim to promote social interaction, create safe and accessible places and enable and support healthy lifestyles.
- 4.8 Section 9 of the NPPF relates to sustainable transport, Paragraph 115 outlines that for development proposals, sustainable transport modes should be prioritised, taking account of the vision for the Site, the type of development and its location.

- 4.9 Section 11 of the NPPF relates to Making effective use of land, Paragraph 125 c) specifically states that planning decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes.
- 4.10 Section 12 of the NPPF relates to achieving well-designed places. The section identifies that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve. It continues by stating that design quality should be considered throughout the evolution and assessment of individual proposals and that early discussion between applicants, the local planning authority and local community about the design of emerging schemes is important.
- 4.11 Section 14 of the NPPF relates to meeting the challenge of climate change. Section 161 states that the conversion of existing buildings will be supported towards improved energy efficiency.
- 4.12 Section 15 of the NPPF relates to conserving and enhancing the natural environment, Paragraph 193 specifically states that opportunities to improve biodiversity in and around developments should be integrated as part of their design.
- 4.13 Section 16 of the NPPF relates to conserving and enhancing the historic environment. Paragraph 203 a) states that plans should include strategies to conserve the historic environment through putting them to viable uses consistent with their conservation

### **London Plan**

- 4.14 The LP, published March 2021, sets out the overall strategic plan for London over the next 20-25 years. The LP is based upon three principal purposes for the Greater London area:
- Promoting economic development and wealth creation;
  - Promoting social development; and
  - Promoting the improvement of the environment.
- 4.15 The following policies are 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 1 – London’s form, character and capacity for growth;
  - Policy D 2 – Infrastructure requirements for sustainable densities;
  - 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 D 12 - Fire Safety;
- Policy E1 – Offices;
- Policy H 1 – Increasing housing supply;
- Policy H 4 – Delivering affordable housing;
- Policy H 5 – Threshold approach to applications;
- Policy H 10 – Housing size mix;
- Policy HC 1 – Heritage conservation and growth;
- Policy G 1 – Green infrastructure;
- 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 7 – Reducing waste and supporting the circular economy;
- 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.

### **The Hillingdon Local Plan Part 1**

- 4.16 The HLP1 was adopted in November 2012 and sets out the planning strategy and policies for the borough through to 2026. The Site is identified within the LP and Site Allocations Plan as the 'Hayes Housing Zone / Opportunity Area.' The Opportunity Area identifies the wider Hayes area as within the 'Heathrow / Elizabeth Line West' Group of the LP and is identified as being capable of delivering 4,000 new homes, amongst other uses.
- 4.17 Other relevant policies include:
- 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;
- Policy EM8 – Land, Water, Air and Noise; and
- Policy EM11 – Sustainable Waste Management.

### **The Hillingdon Local Part 2**

4.18 The HLP2 was adopted on 16 January 2020 and sets out the Development Management Policies for the Council. The relevant policies to this application are the following:

- Policy DME 2 – Employment Uses Outside of Designated Sites;
- Policy DMTC 1 – Town Centre Development;
- Policy DMH 2 - Housing Mix;
- Policy DMH 3 – Office Conversions;
- Policy DMH 7 – Provision of Affordable Housing;
- Policy DMHB 3 – Locally Listed Buildings;
- Policy DMHB 4 – Residential Conversions and Redevelopment;
- Policy DMHB 11 – Design of New Development;
- Policy DMHB 16 – Housing Standards;
- Policy DMHB 17 – Residential Density;
- Policy DMHB 18 – Private Outdoor Amenity Space ;
- Policy DMHB 19 – Play Space;
- Policy DMCI 2 – New Community Infrastructure;
- Policy DMCI 3 – Public Open Space Provision;
- Policy DMCI 4 – Open Spaces in New Development;
- Policy DMCI 5 – Children’s Play Areas;
- Policy DMCI 7 – Planning Obligations and Community Infrastructure Levy;
- Policy DMT 1 – Managing Transport Impacts;
- Policy DMT 2 – Highways Impacts;
- Policy DMT 3 – Road Safeguarding;
- Policy DMT 4 – Public Transport;
- Policy DMT 5 – Pedestrians and Cyclists; and
- Policy DMT 6 – Vehicle Parking.

## 5. Assessment of the Proposed Development

- 5.1 An assessment of the key matters relevant to the application and acceptability of the Proposed Development are set out below.

### Principle of Development

- 5.2 As set out in Section 1, the Record Store has remained largely unoccupied for several years and currently makes a limited contribution to the borough. The NPPF places substantial weight on the reuse of suitable brownfield land and requires planning decisions to promote its effective use, encouraging approval of such proposals unless they would result in substantial harm. Policies H1 of the HLP1 and GG2 of the LP require development to make the most efficient use of brownfield land, particularly within Opportunity Areas.
- 5.3 The Site lies within the Heathrow/Elizabeth Line West Opportunity Area identified in the LP and the Hayes Housing Zone identified in the HLP2. The Hayes Housing Zone was identified to deliver a considerable proportion of the Council's housing requirement. Paragraph 2.17 of the HLP2 states that:
- “Proposals for a mix of retail, **residential** and other town centre uses will be actively encouraged” (Savills emphasis).*
- 5.4 Delivering residential development at this location directly aligns with the London and HLP2 Plans' objectives to intensify development in Opportunity Areas and make the best use of accessible, underutilised land. Policy DME2 of the HLP2 relates to employment sites outside designated employment areas and states that proposals which involve the loss of employment floorspace will normally be permitted if they meet the criteria as set out within the policy.
- 5.5 The Record Store has been subject to continuous marketing over the past five years for office, flexible workspace and mixed-use commercial use. Despite offering significant incentives such as flexible lease terms, rent-free periods and potential subdivision of the floorspace, no credible or sustained commercial interest was generated.
- 5.6 Viability testing further demonstrates that refurbishing the building for continued employment use would result in a negative return and is therefore not a financially viable option. Collectively, the marketing evidence and viability findings confirm that the building represents surplus employment land with no realistic prospect of being brought back into productive office use. The proposed change of use is therefore fully compliant with LP Policy E1 and HLP2 Policy DME2, and its redevelopment for residential purposes represents the optimum viable use of the site.



- 5.7 The proposals strongly accord with Paragraph 125(c) of the NPPF, which requires decision-makers to give *substantial weight* to the value of using suitable brownfield land for new homes, except where doing so would result in substantial harm. The Proposed Development makes use of an existing previously developed site, involving only minor external alterations that conserve and enhance the locally listed building.
- 5.8 Overall, the proposals clearly align with national, regional and local planning policy, all of which prioritise the optimisation of brownfield land, the delivery of new homes in accessible locations, and the intensification of Opportunity Areas. By bringing a long-vacant, brownfield site back into productive use, the scheme fulfils the strategic objectives of the NPPF, the LP and the HLP1 & 2, delivering sustainable growth in a suitable location. The Proposed Development is therefore acceptable in principle.

## Design and Heritage

### Design

- 5.9 A comprehensive Design and Access Statement ('**DAS**') prepared by dMFK is submitted with this application. The development of the proposed design has been informed by the continued pre-application engagement and advice from officers.
- 5.10 LP Policy D1 requires development to be proposed through a design-led approach. The Proposed Development aligns with the policy requirements as it has been created through a design-led approach that responds directly to the established character of the area and the Record Store's architectural significance. The proposed design preserves the distinctive white façades, horizontal windows and concrete structure that characterise the building's industrial heritage. The internal layouts make use of the tall floor-to-ceiling heights and large windows. Shared amenity spaces are also proposed at ground floor level to ensure that the building benefits from active frontages.
- 5.11 Externally, the proposals introduce minor, carefully considered infill panels and façade modifications necessary to convert the building for residential use. Patinated copper has been selected for the infill panels and roof extension as a high-quality material that references the industrial heritage and complements the existing white façade without competing visually with it. The single-storey roof extension has been deliberately designed as a contemporary but subservient addition. Overall, the Proposed Development represents a high quality design in accordance with Section 12 of the NPPF, LP Policies D1, D3, D4 and D5, HLP1 Policy H1 and HLP2 Policy DMHB B11.

## **Heritage**

- 5.12 A Heritage Statement prepared by Turley accompanies the application and provides a detailed assessment of the significance of the Record Store and its role within the Botwell: Thorn EMI Conservation Area. The building is locally listed and is identified as a positive contributor to the character and appearance of the conservation area.
- 5.13 The Heritage Statement notes that the conservation area has experienced extensive change as part of the regeneration of the Old Vinyl Factory, following the long-term decline and loss of its historic light-industrial function. Despite this evolution, the surviving industrial buildings continue to form a coherent group. Within this context, the Heritage Statement concludes that the Proposed Development secures the optimum viable use of the building.
- 5.14 The change of use to residential will ensure the long-term conservation of the building and sustain its contribution to the significance of the conservation area. The proposals, including the sensitively designed rooftop extension and façade interventions, will sustain, and in some respects enhance, the heritage significance of both the locally listed building and the conservation area, representing a heritage benefit.
- 5.15 Overall, the design and layout of the scheme are of high quality and sensitively respond to the architectural character, appearance and significance of the Record Store. The interventions retain the primacy of the building's horizontal expression, preserve key views and maintain its group value within the wider interwar complex. Accordingly, the scheme accords Section 16 of the NPPF and with LP Policies HC1, D1, D3 and D4, HLP1 Policy HE1 and HLP2 Policies DMHB 3 and DMHB 4 and DMHB 11.

## **Housing Mix**

- 5.16 The Proposed Development provides 121 residential units comprising a mix of studio, one-bed, two-bed and three-bed dwellings, reflecting both the physical constraints of the existing building and the need to deliver a balanced range of accommodation within a heritage conversion context.
- 5.17 The mix includes 7 studios (1B1P), 75 one-bed units (including 11 M4(3) wheelchair-accessible or adaptable homes), 34 two-bed units (2B4P) and 5 three-bed units (3B6P). The housing mix has been carefully developed through ongoing dialogue with the Council, incorporating family-sized units where feasible.
- 5.18 As discussed during pre-application discussions, the inherent structural form, depth and retained façade grid of the Record Store significantly constrain the ability to deliver dual-aspect units. Dual-aspect configurations would require the introduction of internal light wells which would render the

project commercially unviable and compromise the integrity of the original building. The Council acknowledged during pre-application that because the building is a locally listed industrial structure being adapted for residential use, it is not physically capable of providing dual-aspect homes across the scheme. Nevertheless, the design has maximised opportunities for dual-aspect units where the existing fabric allows, and where this was not achievable, all single-aspect units have been tested against standards for daylight, sunlight, ventilation and outlook.

- 5.19 HLP2 Policy DMH 2 requires an appropriate mix of dwelling sizes, and acknowledges that site-specific characteristics, such as conversions of existing buildings may influence the deliverability of family units. Likewise, LP Policy H10 recognises that heritage constraints, existing building form and viability considerations are factors in determining an acceptable mix. Overall, the proposed housing mix meets the objectives of the NPPF, the LP and HLP2's Policy requirements.
- 5.20 The Proposed Development has been shaped by Designing Out Crime principles to ensure a safe, secure and well-managed residential environment. The design team has engaged with the Design Out Crime Officer to embed Secure by Design measures throughout the scheme, ensuring crime prevention has been considered from the outset.
- 5.21 Electronic access control will be applied to all shared amenity spaces, building lobbies and both the sixth-floor and rooftop terraces, restricting entry to residents and authorised users only. The rooftop terrace will also operate with time-controlled access to limit night-time use. In addition, CCTV coverage will be provided across all communal areas to support both real-time monitoring and post-incident review. Collectively, these measures create a secure, legible and well-managed environment, promoting natural surveillance, controlled access and increased resident confidence in the safety of their homes.
- 5.22 Overall, the proposed residential accommodation provides a mix of high quality housing which varies in size and type therefore allowing for a range of future occupiers. The scheme meets relevant standards of residential quality, accessibility and amenity set out in the LP and HLP1 & 2 and will deliver a high-quality living environment for future residents.

## Living Standards

### Amenity Space

- 5.23 While the building presents spatial and heritage constraints which limit the type of open space provision, the Proposed Development will nonetheless deliver high-quality amenity space for future occupiers, including internalised balconies, ground floor amenity space, private gardens, shared external terrace and a rooftop terrace.

- 5.24 At ground floor level, the scheme includes private gardens for all ground-floor apartments, each measuring approximately 29 sqm, which exceeds the 25 sqm benchmark and provides residents with generous, well-designed outdoor space. These gardens integrate a mix of planting and informal seating.
- 5.25 The Proposed Development introduces a significant area of shared external amenity space at sixth-floor and roof-level, totalling approximately 875 sqm. The seventh-floor roof terrace provides both shared amenity, while the rooftop terrace delivers a multifunctional shared environment designed as a sequence of distinct activity zones. These include 250 sq. m of children's play space, edible growing gardens, sensory planting, dining tables, informal seating areas and a flexible events space. This arrangement ensures that the roofscape functions as a landscaped communal environment capable of meeting a wide range of resident needs, from active play and gardening to quiet relaxation and community activities.
- 5.26 Due to the constraints of the existing building's façade, and its locally listed status, external balconies cannot be added without harming its heritage significance. The design therefore internalises balcony space within the apartments, providing generous internal living environments while meeting the internalised amenity allowances referenced in the LP. In addition, the proposals include extensive shared amenity spaces at ground level, including a residents' lounge, co-working space, café, gym and community room, ensuring that residents have access to a wide variety of high-quality indoor and outdoor social spaces.
- 5.27 As set out within page 76 of the DAS, the total external amenity requirement for a development of this scale is calculated at 2,640 sqm. While the constraints of the locally listed building and associated existing area within the ownership of the applicant, this cannot be met through traditional external areas. The provision of 2,700 sqm of combined external and internalised amenity exceeds policy expectations while respecting the Site's unique context. This approach is consistent with Section 8 of the NPPF, HLP1 Policy EM4, HLP2 Policies DMHB 18, DMHB 19, Policy DMCI 2, Policy DMCI 3, Policy DMCI 4 and Policy DMCI 5 as well as with LP Policies D8 and G6.

### Space Standards

- 5.28 Policy D6 of the LP and Policy DMHB 17 of the HLP2 require housing development to deliver high-quality design and adequately sized internal rooms. The Proposed Development delivers a high standard of internal accommodation and fully complies with the nationally recognised Nationally Described Space Standards ('NDSS') and in many cases far exceeds the requirements, ensuring that future residents benefit from spacious, functional and well-proportioned homes.

- 5.29 In addition to meeting NDSS requirements, the generous structural characteristics of the existing building, particularly the tall floor-to-ceiling heights of approximately 3.7 metres in typical 1-bed units and up to 4.1 metres in 2-bed mezzanine units, significantly enhance the quality of internal space.
- 5.30 Taken together, the proposals clearly demonstrate compliance with HLP2 Policy DMHB16 and LP Policy D6, ensuring that all new homes provide high-quality, comfortable and sustainable living environments for future residents.

### Outlook

- 5.31 Concerns about the building's relationship with the railway and associated wall were raised during the pre-application stage, particularly regarding the amenity of the ground-floor apartments. Over the course of the pre-application engagement, the amount of ground-floor units has reduced from fourteen in 'Pre-App 1' to six in the final design. The final design thoroughly addresses these concerns raised.
- 5.32 Residents will benefit from a private rear garden terrace of approximately 4.5 metres in depth and 29 sq. m, providing meaningful external amenity space. The proposal includes retention of 2.4-metre-high wall and removal of the existing barbed wire, with agreement from Network Rail.
- 5.33 The ground floor apartments propose a mezzanine floor with bedroom and glazed wall to ensure outlook, daylight and sunlight from all areas of the units. Page 73 of the DAS provides an indication of the line of sight in relation to the existing wall and from being situated within the ground floor apartments. Internally, the living, kitchen and dining spaces include high-level glazed openings positioned around 3.8 metres above finished floor level, allowing generous daylight and sky views above the boundary wall while preserving privacy whilst allowing for good outlook from the ground floor units.
- 5.34 North-facing units achieve an outlook toward Pressing Lane and neighbouring buildings. The DAS demonstrates that views from these units benefit from good light levels and open-sky visibility due to the tall window proportions and the generous floor-to-ceiling heights. Bedrooms located on northern elevations typically experience more limited outlook, which is characteristic of conversion schemes; however, these have been mitigated through appropriate internal layout planning.
- 5.35 At ground-floor level, the number of units has been significantly reduced through the iterative design process in direct response to pre-application advice. Remaining units benefit from private terraces of meaningful depth and high-level glazing designed to enable sky visibility and minimise enclosure while maintaining privacy. To enhance the visual outlook, vertical greenery will be integrated into the rear gardens to soften and conceal the existing concrete wall. The proposal seeks to remove the existing barbed wire with non-climbable landscaping features, maintaining robust security.

- 5.36 The Proposed Development aligns with the requirements of Policy DMHB11 of the HLP2 and LP Policies D3 and D6.

### **Privacy**

- 5.37 The Proposed Development has been carefully designed to ensure a high level of privacy for both future residents and neighbouring occupiers.
- 5.38 For ground-floor apartments, the introduction of private garden terraces and defensible planting ensures separation between private living spaces and common areas.
- 5.39 The northern boundary of the Site faces residential blocks on Pressing Lane. These homes incorporate angled window arrangements, intentionally designed to direct views away from the Record Store. This angled configuration is explained and illustrated within page 81 of the DAS, which shows that the orientation of the neighbouring units' windows limits direct intervisibility between the two buildings.
- 5.40 Overall, privacy is maintained in line with HLP2 Policy DMHB 11, LP Policies D3 and D6 and Section 11 of the NPPF which promotes well-designed, safe, and comfortable living environments.

### **Daylight & Sunlight**

- 5.41 The internal daylight and sunlight assessment, prepared by Point 2 Surveyors, demonstrates that 91% of all assessed habitable rooms meet or exceed the relevant internal daylight targets. Performance is particularly strong in living-kitchen-dining rooms and studios, ensuring that primary living spaces benefit from good natural light. Where lower daylight levels occur, these largely relate to bedrooms positioned on northern elevations facing the Assembly Buildings. This is typical of urban conversion schemes, and the report notes that expectations for daylight in bedrooms are inherently lower than for living rooms. Internal layouts have been configured to maximise daylight reach by locating main living areas along the best-lit elevations wherever possible.
- 5.42 Sunlight performance is also strong for a commercial building. The sunlight exposure modelling shows that 62% of units meet the BRE's guidance for internal sunlight. Those that fall below the recommended target mainly have unavoidable northerly orientations due to the fixed structure of the existing building. Overall, the accommodation provides acceptable and contextually appropriate levels of sunlight for a London conversion scheme.
- 5.43 In relation to potential impact on neighbouring daylight and sunlight, primarily to the north, Point 2 have provided an assessment which demonstrates that the proposal is acceptable in terms of both internal impact to neighbouring residents and in relation to overshadowing of amenity spaces.

- 5.44 The Proposed Development therefore complies with Policy DMHB 11 of the HLP2, Policies D2 and D6 of the LP and Section 8 of the NPPF.

### **Lifetime Homes**

- 5.45 A comprehensive Lifetime Homes Statement has been prepared and confirms that all dwellings within the Proposed Development meet the full suite of 16 Lifetime Homes criteria, in accordance with Hillingdon Local Plan requirements and the Council's adopted standards. The proposals incorporate level access to all principal entrances, compliant corridor widths, accessible internal circulation, and entrance-level living accommodation. All bathrooms, WCs and structural elements are designed to allow future adaptations, ensuring the homes can flexibly accommodate changing household needs over time.
- 5.46 The building is also served by three Part M compliant lifts, ensuring inclusive and convenient movement through all residential floors.
- 5.47 Mechanical ventilation is incorporated where openable windows cannot be used due to external noise constraints, with large-format glazing ensuring strong daylight provision and outward views.
- 5.48 Taken together, these measures demonstrate that the Proposed Development has embedded inclusive design principles from the outset and provides homes that are flexible, accessible and capable of adaptation throughout their lifecycle. The scheme therefore accords with HLP2 Policy DMHB 11, LP Policies D3, D5, D6 and D7 and Section 8 of the NPPF.

### **Noise and Vibration**

- 5.49 A Noise Impact Assessment ('NIA') has been prepared by CPWP to support the application. The assessment includes detailed external and internal noise and vibration surveys, together with 3D environmental modelling of rail and road noise affecting the site. The results confirm that railway operations to the south of the building represent the dominant noise source, with secondary contributions from local road traffic.
- 5.50 The assessment identifies that openable-window ventilation would not enable internal habitable rooms to meet the required noise criteria. Accordingly, the proposals incorporate a mechanical ventilation heat recovery system, supported by enhanced glazing and façade performance measures. High-performance glazing systems are specified for the most exposed façades, with appropriate acoustic attenuation included for ventilation ductwork. With these mitigation measures in place, the development is capable of achieving the internal noise standards set out in BS 8233 and the residential noise criteria applied by the London Borough of Hillingdon.
- 5.51 The assessment also considers external amenity areas. While some lower-level and south-facing gardens / balconies exceed the desirable BS 8233 guideline range due to their proximity to the

railway, the Level 7 rooftop amenity terrace, along with north-facing upper-level balconies, achieve the guideline values. BS 8233 recognises that full compliance may not always be achievable in urban environments adjoining strategic transport infrastructure, and that alternative compliant communal spaces can appropriately meet residents' amenity needs. The rooftop terrace therefore provides a policy-compliant solution.

- 5.52 Vibration and ground borne noise have also been assessed and shown to fall below the thresholds set by the London Borough of Hillingdon for residential development, indicating that the building is suitable for conversion in vibration terms. The assessment establishes plant noise emission limits to ensure any new building services operate below background levels, allowing compliance with the borough's requirements at detailed design stage.
- 5.53 Overall, the NIA demonstrates that, through appropriate acoustic design and mitigation, the development can meet the requirements of Section 8 of the NPPF, LP Policy D14, and HLP1 Policy EM8. The proposals are therefore considered acceptable in noise and vibration terms.

### **Air Quality**

- 5.54 An Air Quality Assessment ('AQMA') has been prepared by Peninsular Acoustics. This assessed potential emissions from the development in order to determine compliance with the air quality positive requirements. The building energy strategy does not include any new combustion plant, as such, the development is air quality neutral from a building emissions perspective. The scheme is also car-free, as such, the development is air quality neutral from a transport emissions perspective.
- 5.55 The potential for exposure of future residents to exceedances of the AQOs and Concentration Target was assessed based on local monitoring results, predicted concentrations from the LAEI and Site context. This indicated that concentrations of NO<sub>2</sub>, PM<sub>10</sub> and PM<sub>2.5</sub> are likely to be below the relevant AQOs and Concentration Target at the development location. As such, the site is considered suitable for the proposed use from an air quality perspective. Overall, the Proposed Development aligns with the requirements of HLP1 Policy EM8 and LP Policy SI 1.

## **Landscape and Ecology**

- 5.56 A comprehensive Landscape Design and Access Statement has been prepared by Studio Supernatural to support the application. The strategy responds directly to the Site's industrial heritage, proximity to the railway, limited opportunities for in-ground planting, and the requirement to deliver meaningful amenity and ecological enhancements within a constrained footprint.
- 5.57 A key component of the landscape strategy is the creation of high-quality, useable residential amenity. At ground floor this includes shared lounge spaces, low-level planters, and improved



circulation to the cycle store. Private rear gardens for ground floor units accommodate planting, screening and vertical greening while maintaining defensible space. The roof terrace provides a wide range of amenity zones including family lawns, informal play, a dedicated 0–11 play area, central gathering spaces, a lounge and bar area, and a dedicated growing space for residents. The arrangement ensures that meaningful and well-defined amenity is delivered despite spatial constraints at ground level, while maximising sunlight, views and environmental benefits at roof level.

- 5.58 The Urban Greening Factor calculation submitted with the application demonstrates a significant uplift in greening across the site. The scheme achieves a UGF score of 1.01, substantially exceeding the LP's target of 0.4. This is achieved through a combination of biodiverse roofs, extensive ground- and roof-level planting, tree planting and green wall provision. The proposals therefore deliver a measurable enhancement in biodiversity. The approach aligns with relevant LP Policies D8, G1 and G6, and with HLP1 Policies BE1 and EM4.
- 5.59 Biodiversity Net Gain ('**BNG**') is not mandatory for the Proposed Development, as the application is exempt under de minimus exemption, given that there is no vegetated habitat on Site being impacted. However, Cherryfield Ecology has provided a BNG assessment in support of the Proposed Development. The Proposed Development will result in a +0.74 total net unit change and therefore a significant net gain in habitat units.
- 5.60 This uplift in habitat units represents a clear sustainability benefit of the scheme and contributes positively to the wider benefits delivered by the development. The Proposed Development is therefore aligned the objectives set out in Section 15 of the NPPF, with HLP1 Policy EM7 and LP Policy G6.

## Highways

- 5.61 A Transport Statement ('**TS**') has been prepared by TTP Consulting in support of this application. The assessment demonstrates that the proposals would bring about a significant Healthy Street improvement as the proposals will replace a largely vacant Site. The Site is located in a sustainable location, well-connected to the main pedestrian routes that serve public transport facilities and local amenities.
- 5.62 The proposed scheme includes parking for up to 124 bicycles in total which includes 12 spaces retained to the front of the building, 108 proposed within the building for residents and 4 short stay space proposed to the rear.
- 5.63 In terms of trip generation, the proposed residential development would generate fewer trips during peak periods and across the day when compared to the existing office accommodation. The

Proposed Development would be car-free, with the exception of blue badge parking, which is located to the west of the building, with residents able to use the main entrance of that on the western flank.

- 5.64 Overall, the TS concludes that the Proposed Development is consistent with transport planning policy guidance and will not give rise to any material transport related impact, in accordance with paragraph 116 of the NPPF.
- 5.65 A Travel Plan ('TP'), prepared in accordance with Travel Plan guidance issued by Transport for London ('TfL') has also been provided by TTP Consulting. The purpose of the TP is to put into place the management tools deemed necessary to enable residents to make more informed decisions about their travel, which at the same time minimises the adverse impacts of their travel on the environments. The TP sets out a strategy for eliminating barriers keeping residents from using sustainable modes, which in effect promote car-free lifestyles.
- 5.66 The Site is well connected to the main pedestrian routes that serve public transport facilities and local amenities, this includes a pedestrian underpass to Hayes and Harlington Station that is accessible from Blyth Road. The TP also confirms that the Site is located in a sustainable location, with a variety of local facilities and amenities including schools, banks, a post office, convenience stores, pharmacies, cafes and a green space located a short walking distance from the Site.
- 5.67 The Site is also accessible by bicycle, as the streets within the wider estate are considered suitable for cycling due to relatively low traffic volumes. The closest bus stop is located approximately 450m (5-6 minute) to the north-east of the Site on Clarendon Road and is served by buses on Route U5, with further services available from the stop outside the Hayes & Harlington Station. Regarding rail, Hayes & Harlington station is located approximately 650m (8 minute) to the east of the Site and is served by the Elizabeth Line and Great Western Rail services.
- 5.68 Overall, the Proposed Development is acceptable in transport terms and aligns with Section 9 of the NPPF, HLP2 Policies DMT 1, DMT 2, DMT 3, DMT 4, DMT 5 and DMT 6 as well as with LP Policies T3, T4, T5 and T6.

### **Waste Management, Servicing & Deliveries**

- 5.69 An Operational Waste Management Plan has been prepared by TPP Consulting to support the application. The plan establishes the approach to waste management for the development, setting out measures to minimise waste generation, encourage reuse, and ensure appropriate separation and storage of recyclable and residual waste.
- 5.70 The building contains five ground-floor bin stores, including four internal stores and a separate bulky-goods store at the eastern end of the building. A total of 19 Eurobins is provided across the stores, accommodating general waste, mixed recycling and food waste, with all bins clearly labelled

to support correct separation at source. It was raised at pre-application stage regarding the location of bin storage adjacent to the external shared terrace, however given the distance requirements for residents to drop off their waste, it was not possible to relocate. Waste collection will take place from Pressing Lane, where refuse vehicles can pull up adjacent to the bin store entrances, allowing efficient and safe collection without entering the site.

- 5.71 A Delivery and Servicing Management Plan ('**DSMP**') has also been prepared by TTP Consulting. As the scheme is car-free, all servicing and delivery activity will take place from Pressing Lane.
- 5.72 To minimise impacts on the local highway and maintain safe and efficient operation, a series of initiatives will be implemented. These include encouraging residents to make use of parcel lockers, consolidating deliveries, avoiding deliveries during peak times, and ensuring engines are turned off while loading or unloading. The Estate Management Team will coordinate activities such as resident moves and direct vehicles to appropriate stopping locations. Delivery and servicing activity will be monitored, with the DSMP reviewed annually each January to ensure it remains effective and up to date. The proposals align with Section 2 of the NPPF, HLP1 Policy EM11 and LP Policy SI7.

## Affordable Housing

- 5.73 Policies H2 of the HLP1 and DMH 7 of the HLP2 require major residential developments to maximise the delivery of on-site affordable housing, with an expectation that schemes of ten or more units should provide around 35% affordable housing, subject to viability. Policies H4, H5 and H6 of the LP reinforce this strategic objective and confirm that where a proposal cannot meet the 35% threshold, it must be assessed through the viability-tested route. The NPPF also identifies affordable housing as a key component of sustainable development and recognises that viability evidence may justify a reduced level of provision where development would otherwise become undeliverable.
- 5.74 In relation to affordable housing provision, the viable level of affordable housing delivery on site has been assessed through a Financial Viability Assessment, undertaken by Savills. The results of this assessment show that the residual land value generated by the proposed development falls below the benchmark land value, demonstrating the development is technically unviable in affordable housing viability terms. As such, at this stage the development cannot viably support affordable housing.

## Energy & Sustainability

- 5.75 An Energy Statement has been prepared by CPWP. The site lies within a Heat Network Priority Area, and a detailed review of the London Heat Map has therefore been undertaken. The assessment

confirms that there are no existing networks within a feasible connection distance, and although a future network is identified, no technical or delivery information is available to demonstrate that a connection would be viable within the development timeframe.

- 5.76 The development follows the LP energy hierarchy. At the Be Lean stage, a 48 per cent reduction in regulated CO<sub>2</sub> emissions is achieved through fabric efficiency, optimised building services, air-source technology and heat recovery ventilation. There is no additional saving at the Be Clean stage due to the absence of a viable heat network connection. Further savings at the Be Green stage are delivered through rooftop photovoltaic panels, with the maximum practicable array incorporated within the available roof space.
- 5.77 The energy strategy demonstrates a consistent commitment to reducing operational energy demand and carbon emissions, addressing overheating risk, and delivering a resilient low-carbon heating solution appropriate for a constrained, locally listed building. The proposals therefore comply with Section 14 of the NPPF, the requirements of Policies BE1 and EM1 of the HLP1 and Policy SI 3 of the LP.

## Aerodrome Safeguarding

- 5.78 Aerodrome safeguarding ensures that development in the vicinity of airports does not pose a risk to aviation safety, including through breaches of Obstacle Limitation Surfaces ('OLS') or the creation of hazards such as glare, turbulence or bird-strike risk. The Site lies within the safeguarding consultation zone for Heathrow Airport; however, the Proposed Development does not give rise to any safeguarding concerns.
- 5.79 The overall height of the Record Store building will remain unchanged at +66.035m AOD, measured to the top of the existing parapet. The proposed works, including the rooftop interventions, do not increase the building's maximum height and all activities and structures will remain well below the relevant OLS, which in this location is 67.9m AOD. The proposals therefore do not infringe any safeguarded surface and does not introduce development that could affect navigational aids, visual flight paths, or operational airspace.
- 5.80 Given that the building height is not being increased and the completed development remains fully compliant with the safeguarded height threshold, an aerodrome safeguarding assessment is not required. The proposals are therefore acceptable with regard to aerodrome safeguarding.

## Draft S106 Heads of Terms

- 5.81 In assisting in the delivery of new homes the NPPF and PPG recognise that conditions or planning obligations may be required to make development acceptable and mitigate what might otherwise be unacceptable impacts on the surrounding area. However, NPPF 55 states that “*planning obligations should only be used where it is not possible to address unacceptable impacts through a planning condition.*” As such, planning obligations must only be sought where they meet all of the following tests as set out at NPPF 58:
- a) necessary to make the development acceptable in planning terms;*
  - b) directly related to the development; and*
  - c) fairly and reasonably related in scale and kind to the development.*
- 5.82 This is in accordance with Regulation 122(2) of the CIL Regulations 2010 (as amended), which puts into law the need for planning obligations to be directly related to development.
- 5.83 It is anticipated that the following matters could potentially be requested within any future S106 Agreement:
- Provision of Affordable Housing
  - Off-Site Highway Mitigation and Works
  - Carbon (Net Zero) Offsetting Contribution
  - Employment & Skills Training
- 5.84 The details of the above and any other potential requirements will need to meet the CIL Regulation 122(2) tests of necessity; be related to the development; and fairly and reasonably related in scale and kind to the development. These matters can be fully discussed following the formal consultation process.

## 6. Public Benefits

- 6.1 The Proposed Development will deliver a wide range of public benefits, which should be considered in the planning balance when considering whether the proposals constitute sustainable development. The benefits extend across economic, social, environmental and heritage considerations. Case law<sup>2</sup> establishes that benefits arising from policy-compliant development are themselves capable of being treated as public benefits. On this basis, many of the scheme's features, including those which accord with local or national policy, also represent public benefits in their own right.

### Economic Benefits

- 6.2 The redevelopment of a long-vacant building into a productive use will generate substantial economic benefits. The construction phase is expected to result in significant direct and indirect employment, together with supply-chain benefits that will extend across the local economy with an approximate of 284 jobs created in the construction phase.
- 6.3 Once occupied, the new homes will support an approximate household spend of £2.48m annually from residents of the development within the local area supporting local shops, services and hospitality.
- 6.4 The uplift in resident population will generate sustained demand for local jobs and services, assisting local economic resilience and contributing to growth objectives.
- 6.5 The scheme will also generate considerable fiscal benefits. Increased council tax revenue over the first decade, will support investment in local infrastructure, public services and community facilities. Estimated household expenditure from future residents will further reinforce the vitality of the surrounding urban area. The site's accessible location maximises these benefits by placing new households within an established and emerging growth corridor.

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<sup>2</sup> Vistry Homes Ltd v Secretary of State for Levelling Up, Housing And Communities & Ors (Rev1) [2024] EWHC 2088

## **Social Benefits**

- 6.6 The scheme provides a variety of communal internal and external amenity spaces. These include co-working facilities, a residents' lounge, landscaped terraces and diverse rooftop areas offering play space, quiet seating, edible planting, event capacity and wellbeing space. These are significant social benefits that promote community interaction, health and wellbeing.
- 6.7 The proposals include a gym for use by future residents including a studio to ensure there are facilities for all.
- 6.8 The homes themselves exceed national internal space standards and benefit from generous ceiling heights, excellent daylight, and, for ground floor units, private gardens that materially enhance living conditions. Loft-style units introduce a distinctive housing type not currently available in the Borough, broadening choice and meeting diverse housing needs.
- 6.9 The scheme also provides accessible dwellings, including wheelchair-accessible units, supporting inclusive housing delivery.

## **Environmental Benefits**

- 6.10 The proposals retain and adapt the existing building, resulting in a substantial reduction in embodied carbon compared with demolition and rebuild.
- 6.11 The development adopts an energy-efficient design approach incorporating air source heat pumps, low-energy fittings, and fabric-first principles. Rooftop photovoltaics will contribute to reduced on-site energy demand.
- 6.12 The landscape strategy delivers new planting at ground and roof level, including native species, pollinator-supporting habitat, bird and bat boxes, and allotment-style growing areas. These interventions deliver measurable biodiversity enhancements and a significant increase in Biodiversity Net Gain.
- 6.13 Sustainable travel is encouraged through extensive cycle parking provision, e-mobility partners, and a car-free development strategy, with only accessible parking provided. This supports modal shift, active travel and reduced reliance on private vehicles.

## Heritage Benefits

- 6.14 The Proposed Development preserves and enhances the architectural and historic significance of the locally listed building. Minimal intervention and high-quality materials and details maintain the character of the original structure while enabling its long-term viable use. Case law confirms that securing the optimum viable use of a heritage asset is a public benefit and carries substantial weight.
- 6.15 The proposals enhance the unique identity of the Record Store and surrounding area and strengthens its role in placemaking as part of the ongoing evolution of the conservation area's heritage character and appearance.



## 7. Conclusion

- 7.1 This application seeks full planning permission for the change of use from office (Class E) to residential (Class C3), construction of a roof extension and terrace and associated works to the façade and external areas of the Site. The proposals will facilitate the occupation of longstanding vacant floorspace to provide high quality housing within an increasingly residential area, delivering sustainable development and securing sustainable economic growth.
- 7.2 The proposals have been designed through a design-led approach that respects the character of the locally listed building and its contribution to the Botwell: Thorn EMI Conservation Area. The accompanying Built Heritage Appraisal demonstrates that the scheme preserves the building's industrial architectural heritage through modest external interventions.
- 7.3 This Statement has demonstrated that the Proposed Development accords with the development plan for the London Borough of Hillingdon. The Proposed Development benefits from the presumption in favour of sustainable development, and substantial weight should be afforded to making efficient use of this vacant brownfield Site in contributing to meeting housing needs, in accordance with the NPPF.
- 7.4 The Proposed Development will deliver substantial public benefits including economic, social, environmental and heritage benefits
- 7.5 This Statement has also demonstrated that the Proposed Development is acceptable in all other respects, including the principle of development, design, heritage, noise, residential unit mix, privacy, daylight & sunlight, highways, housing mix, ecology & BNG, air quality, landscape, open space, fire safety, energy & sustainability, waste management and aerodrome safeguarding.
- 7.6 In conclusion, the proposed redevelopment of the Record Store represents a sustainable, heritage-sensitive scheme that will deliver significant social, economic and environmental benefits for Hayes and the wider London Borough of Hillingdon. As the proposals accord with the development plan, planning permission should be granted in accordance with Section 38(6) of the Planning and Compulsory Purchase Act 2004. Furthermore, where an application accords with the development plan, it is sustainable development and should be granted 'without delay' in accordance with Paragraph 11 of the NPPF.

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