

Report of the Head of Planning, Transportation and Regeneration

Address 1 VINYL SQUARE, THE OLD VINYL FACTORY BLYTH ROAD HAYES

Development: Redevelopment of the site to provide a mixed-use development comprising 134 residential units (C3 Use Class) and ground floor commercial floorspace (flexible A1/A2/A3/A5/B1 Use Class), with associated car parking, cycle parking and landscaping.

LBH Ref Nos: 59872/APP/2019/3852

Drawing Nos: 0348-SEW-ZZ-RF-DR-L-501105 Rev 01
WIE16463-102-R-1.3.2 Issue 01 Nov 2019 Noise Impact Ass
L19091_C_Flood Risk and Drainage Statement_R04
01659-JTP-EL-005-P1 - East Courtyard Elevator
01659-JTP-EL-003-P1 - South Elevator
01659-JTP-EL-002-P1 - East Elevator
0348-SEW-ZZ-00-DR-L-501102 Rev 0C
01659-JTP-SL-003 Rev P1
01659-JTP-PL-010-P1 - Level 10 Plar
01659-JTP-PL-009-P1 - Level 09 Plar
01659-JTP-PL-007-P1 - Level 07 Plar
01659-JTP-PL-006-P1 - Level 06 Plar
01659-JTP-PL-005-P1 - Level 05 Plar
01659-JTP-PL-004-P1 - Level 04 Plar
01659-JTP-PL-003-P1 - Level 03 Plar
01659-JTP-PL-002-P1 - Level 02 Plar
01659-JTP-PL-000-P1 - Ground Floor Plar
01659-JTP-EL-007-P1 - West Courtyard Elevator
01659-JTP-SL-001 Rev P1
R04-AS-DB-Outline Construction Logistics Plan (19
Covering Letter dated 26th November 2019)
01659-JTP-PL-001 Rev P2
01659-JTP-EL-001 Rev P2
01659-JTP-PL-012 Rev P3
01659-JTP-SL-002 Rev P3
01659-JTP-EL-006-P1 - South Courtyard Elevator
Design and Access Statement February 2020
01659-SK_066
01659-JTP-EL-004 Rev P2
01659-JTP-PL-008 Rev P2
01659-JTP-PL-001 Rev P2
0348-SEW-ZZ-00-DR-L-501101 Rev 01
0348-SEW-ZZ-09-DR-L-501104 Rev 01
01659-SK_042 Rev E
0348-SEW-ZZ-01-DR-L-501103 Rev 02
4120_003 Rev C

Date Plans Received:	28/11/2019	Date(s) of Amendment(s):	14/02/2020
Date Application Valid:	09/12/2019		28/11/2019 07/02/2020

1. SUMMARY

The application proposes a mixed use redevelopment within the wider Old Vinyl Factory site on Blyth Road in Hayes. The proposal is for a single building of staggered storey heights that would provide 134 new residential units (Use Class C3) with 395m² of flexible commercial space to accommodate A1/A2/A3/A5/B1 uses, plus associated vehicle and cycle parking, communal amenity space, child play space and associated landscaping and plant.

Although this is a stand alone full planning application the site was part of the original outline masterplan for redevelopment of the VINYL factory. The outline masterplan is a material planning consideration which affects consideration of subsequent proposals on the site.

The application site for the current application is referred to in the outline planning permission as the Veneer Building, which formed phase 7 of TOVF masterplan. The approved outline parameters for the Veneer Building comprised a building of up to 11-storeys in height (maximum AOD of +66.90, excluding lift overruns and parapets etc). The Veneer Building was proposed to be the tallest building within TOVF masterplan, as a focal point and landmark to this entry point into TOVF, and Vinyl Square. As such design and massing considerations for this full planning application have been heavily influenced by the outline consent.

Although the full application proposes more residential units than the outline application it delivers a considerable uplift in affordable housing, which clearly weighs in favour of a positive recommendation.

The proposed development is considered an appropriate mix of uses, scale and built form that is well designed within the context of the locality. The provision of additional residential units to the local area is supported by local policy and the London Plan (2016). The application is therefore recommended for approval subject to conditions and a legal agreement to secure appropriate contributions.

2. RECOMMENDATION

1. That the application be referred back to the Greater London Authority.

2. That should the Mayor not issue a direction under Article 7 of the Order that he is to act as the Local Planning Authority for the purposes of determining the application, delegated powers be given to the Head of Planning, Transportation and Regeneration, to approve this application subject to:

A) Entering into a Legal Agreement with the applicant under Section 106 of the Town and Country Planning Act 1990 (as amended) and/or S278 of the Highways Act 1980 (as amended) and/or other appropriate legislation to secure:

- 1. On-site Affordable Housing (including review mechanism): (1 bed x 10 units, 2 bed x 6 units, 3 bed x 20 units. Tenure split 67% intermediate and 33% affordable rent. One third (3 maisonette units) of the affordable rent is proposed as London Affordable rent, which equates to 11% by habitable room).**
- 2. Carbon off-set contribution**
- 3. Air Quality contribution £104,565**
- 4. Parking permits restriction for future occupiers**
- 5. Santander Bike Scheme Contribution £2,500**
- 6. Residential Travel Plan plus £20,000 bond**

7. On site car club of 2 spaces, free membership for 3 years plus £50 credit for one person in each unit
8. External Amenity Space contribution £40,000
9. Grand Union Canal Quiet Way contribution of £18,000
10. Public Realm Connectivity £129,000
11. Public Open Space contribution £47,408.26
12. Play Space Strategy
13. On site blue badge car parking utilisation review to ensure a policy compliant provision should the demand for blue badge car parking exceed the on-site provision
14. Updated site wide Car Park Management Plan for the wider Old Vinyl Factory Site (wider site as approved under application reference 59872/APP/2013/3775)
15. Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered.
16. Project Management & Monitoring Contribution equal to 5% of the total cash contributions. Details shall be in accordance with the Council Planning Obligations Supplementary Planning Document 2014.

B) That the applicant meets the Council's reasonable costs in preparation of the variation to the Section 106 and/or 278 Agreements and any abortive work as a result of the agreement not being completed.

C) That Officers be authorised to negotiate and agree the detailed terms of the proposed agreement and conditions of approval.

D) If the Legal Agreements have not been finalised by 22 October 2020 (or such other timeframe as may be agreed by the Head of Planning, Regeneration and Transportation), delegated authority be given to the Head of Planning, Transportation and Regeneration to refuse the application for the following reason:

'The applicant has failed to provide measures to mitigate the impacts of the development through enhancements to the environment necessary as a consequence of demands created by the proposed development (relating to affordable housing, carbon off-set, air quality, parking permits, sustainable transport, travel plan, external amenity space, public realm and public open space). The proposal therefore conflicts with the Town and Country Planning (General Permitted Development) (England) Order 2015, policies DMCI 7, DMT 2 and DMT 5 of the Hillingdon Local Plan: Part Two Development Management Policies (January 2020), the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012), Planning Obligations SPG 2014, the London Plan (March 2016) and the NPPF.'

E) That subject to the above, the application be deferred for determination by the Head of Planning, Transportation and Regeneration under delegated powers, subject to the variation to the original Section 106 Agreement under Section 106 of the Town and Country Planning Act 1990 and other appropriate powers with the

applicant.

F) That if the application is approved, the following conditions be imposed subject to changes negotiated by the Head of Planning, Transportation and Regeneration prior to issuing the decision.

1 COM3 Time Limit

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

REASON

To comply with Section 91 of the Town and Country Planning Act 1990.

2 COM4 Accordance with Approved Plans

The development hereby permitted shall not be carried out except in complete accordance with the details shown on the submitted plans, numbers:

01659-JTP-SL_001 P1 Site Location Plan
01659-JTP-SL-002 P3 Proposed Site Plan
01659-JTP-SL-002 P1 Existing Site Plan
01659-JTP-PL-000 P1 Ground Floor Plan
01659-JTP-PL-001 P2 Level 01 Plan
01659-JTP-PL-002 P1 Level 02 Plan
01659-JTP-PL-003 P1 Level 03 Plan
01659-JTP-PL-004 P1 Level 04 Plan
01659-JTP-PL-005 P1 Level 05 Plan
01659-JTP-PL-006 P1 Level 06 Plan
01659-JTP-PL-007 P1 Level 07 Plan
01659-JTP-PL-008 P2 Level 08 Plan
01659-JTP-PL-009 P1 Level 09 Plan
01659-JTP-PL-010 P1 Level 10 Plan
01659-JTP-PL-012 P3 Roof Plan
01659-JTP-EL-001 P2 North Elevation
01659-JTP-EL-002 P1 East Elevation
01659-JTP-EL-003 P1 South Elevation
01659-JTP-EL-004 P2 West Elevation
01659-JTP-EL-005 P1 East Courtyard Elevation
01659-JTP-EL-006 P1 South Courtyard Elevation
01659-JTP-EL-007 P1 West Courtyard Elevation
01659_SK_042 E Amenity Strategy Provision
01659_SK_066 Level 01 Maisonette Access
0348-SEW-ZZ-00-DR-L-501101 01 Ground Floor General Arrangement Plan
0348-SEW-ZZ-00-DR-L-501102 Ground Floor External Levels Plan
0348-SEW-ZZ-00-DR-L-501103 02 First Floor General Arrangement Plan
0348-SEW-ZZ-00-DR-L-501104 01 Ninth Floor General Arrangement Plan
0348-SEW-ZZ-00-DR-L-501105 01 Roof General Arrangement Plan; and shall thereafter be retained/maintained for as long as the development remains in existence.

REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2016).

3 COM5 General compliance with supporting documentation

The development hereby permitted shall not be occupied until the following has been

completed in accordance with the specified supporting plans and/or documents:
Design and Access Statement February 2020
Wind Microclimate Desk-based Assessment November 25th 2019 RWDI #1904779 - Rev D
Planning Statement 26 November 2019
Desk Based Ecology Report ECO00926-R-01b November 2019
Geotechnical & Environmental Investigation RG/HLEI15948 - 8 March 2011
Land Contamination Report Phase 1 Environmental Review November 2019
Phase 2 - Environmental Site Investigation HLEL13784/001R September 2010
Transport Assessment November 2019
Air Quality Assessment November 2019 WIE16463-100-R-1-3-1
Daylight and Sunlight Report 14770-19-1125 25th November 2019
Internal Daylight and Sunlight Assessment 25 November 2019
Fire Strategy HHF_UK02710_IAR_001-01 Rev 01
Heritage & Townscape Views Assessment November 2019
Verification Report VR-18606-15-14 Feb 2015

Thereafter the development shall be retained/maintained in accordance with these details for as long as the development remains in existence

REASON

To ensure the development complies with the provisions Hillingdon Local Plan Parts 1 (November 2012) and 2 (January 2020) and the London Plan (2016).

4 COM7 Materials (Submission)

Detailed drawings or samples of materials as appropriate, in respect of the following shall be submitted to and approved in writing by the local planning authority before the relevant part of the works is begun, and the works shall not be carried out other than in accordance with the details so approved and shall thereafter be so maintained:

- (a) Samples of materials
- (b) Details of roof parapets, window and door reveals, spandrel panels
- (c) Details of balconies, railings, metal cladding, metal mesh rainwater pipes
- (d) Details of signage and external lighting

Sample panels required

Sample panels of facing brickwork showing the proposed colour, texture, facebond and pointing shall be provided on site, and approved in writing by the local planning authority before the relevant parts of the approved works are commenced, and the sample panels shall be retained on site until the work is completed in accordance with the panel (s) so approved.

Windows and doors

Elevational drawings at a scale of 1:20 and plan and vertical sectional drawings at a scale of 1:2 of the proposed windows and doors shall be submitted to and approved in writing by the local planning authority. The works shall be undertaken in accordance with the approved details.

REASON

To ensure that the development presents a satisfactory appearance in accordance with Policy HE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012), Policies DMHB 1, DMHB 4 and DMHB 11 of the Hillingdon Local Plan Part 2 (2020).

5 COM9 Landscaping (car parking & refuse/cycle storage)

Prior to above ground works, a landscape scheme shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall include: -

1. Details of Soft Landscaping
 - 1.a Planting plans (at not less than a scale of 1:100),
 - 1.b Written specification of planting and cultivation works to be undertaken,
 - 1.c Schedule of plants giving species, plant sizes, and proposed numbers/densities where appropriate

2. Details of Hard Landscaping
 - 2.a Refuse Storage
 - 2.b Cycle Storage
 - 2.c Means of enclosure/boundary treatments
 - 2.d Car Parking Layouts (including demonstration that 20% of all parking spaces are served by active electrical charging points and 80% are served by passive electrical charging points)
 - 2.e Hard Surfacing Materials
 - 2.f External Lighting
 - 2.g Other structures (such as play equipment and furniture)

3. Living Walls and Roofs
 - 3.a Details of the inclusion of living walls and roofs
 - 3.b Justification as to why no part of the development can include living walls and roofs

4. Details of Landscape Maintenance
 - 4.a Landscape Maintenance Schedule for a minimum period of 5 years.
 - 4.b Proposals for the replacement of any tree, shrub, or area of surfacing/seedling within the landscaping scheme which dies or in the opinion of the Local Planning Authority becomes seriously damaged or diseased.

5. Schedule for Implementation

6. Other
 - 6.a Existing and proposed functional services above and below ground
 - 6.b Proposed finishing levels or contours

Thereafter the development shall be carried out and maintained in full accordance with the approved details.

REASON

To ensure that the proposed development will preserve and enhance the visual amenities of the locality and provide adequate facilities in compliance with policies DMHB 11, DMHB 14, DMEI 1 and DMT 6 of the Hillingdon Local Plan Part 2 (2020) and Policies 5.11 (living walls and roofs) and 5.17 (refuse storage) of the London Plan (2016).

6 COM15 Sustainable Water Management

Prior to commencement (excluding demolition and site clearance) a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority.

The scheme shall clearly demonstrate how it, manages water and demonstrate ways of controlling the surface water on site by providing information on:

- a) Suds features:

- i. incorporating sustainable urban drainage (SuDs) in accordance with the hierarchy set out in Policy 5.13 of the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided,
 - ii. calculations showing storm period and intensity and volume of storage required to control surface water and size of features to control that volume to Greenfield run off rates at a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus Climate change. This rate should be presented per hectare as well as the total for the whole site.
 - iii. where it is intended to have above ground storage, overland flooding should be mapped, both designed and exceedance routes above the 100, plus climate change, including flow paths depths and velocities identified as well as any hazards, (safe access and egress must be demonstrated).
 - iv. Where infiltration techniques (soakaway) a site investigation must be provided to establish the level of groundwater on the site, and to demonstrate the suitability of infiltration techniques proposed on the site. (This should be undertaken at the appropriate time of year as groundwater levels fluctuate).
- b) Minimise water use.
- i. incorporate water saving measures and equipment.
 - ii. provide details of how rain and or grey water will be recycled and reused in the development.
- c) Long Term Management and Maintenance of the drainage system.
- i. Provide a management and maintenance plan
 - ii Include details of Inspection regimes, performance specification, (remediation and timescales for the resolving of issues where a PMC).
 - iii Where overland flooding is proposed, the plan should include the appropriate actions to define those areas and actions required to ensure the safety of the users of the site should that be required.
 - iv. Clear plans showing all of the drainage network above and below ground. The responsibility of different parties such as the landowner.

Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.

REASON

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to:

Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012),

Policy 5.12 Flood Risk Management of the London Plan (March 2016) and

To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (March 2016), and

Conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan (March 2016).

National Planning Policy Framework (June 2019), and the Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

7 NONSC Energy Strategy

Prior to above ground works, an energy assessment shall be submitted to and approved in writing by the Local Planning Authority. The energy assessment shall provide full details and specifications of all the measures to be implemented on site to demonstrate the development will achieve the energy reduction targets of the London Plan Policy 5.2. The assessment shall demonstrate at least a 35% saving onsite with any shortfall being made up through an offsite contribution. The details within the assessment must include:

1. A full and clear baseline of the energy (kwhr) and carbon (tCO₂) associated with the development assessment against building regulations 2013.
2. Full details of the energy efficiency measures to be incorporated within the development and their impact on the baseline energy and carbon performance.
3. Full details (including plans, elevations and roof plans) and specifications of the low and zero carbon technology to be incorporated within the development and the impact on the baseline energy and carbon performance.

The development must proceed in accordance with the approved assessment, plans and specifications.

REASON

To ensure the development contributes to the reduction of carbon emissions in accordance with Policy 5.2 of the London Plan (2016) and Policy DMEI 2 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

8 NONSC Amenity/Play Space Strategy

Prior to above ground works, an Amenity/Play Space Strategy shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, external amenity and play space shall be set out and maintained as set out within the approved strategy unless otherwise agreed in writing by the Local Planning Authority.

REASON

To ensure appropriate external amenity and child play space is provided for the development, in accordance with Policies DMHB 18, DMHB 19 and Policy DMCI 5 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

9 COM30 Contaminated Land

If, during development, contamination not previously identified is discovered at the site then no further construction of the development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local planning authority detailing how this unanticipated contamination is to be dealt with, and until written approval from the local planning authority is obtained. The remediation strategy shall be implemented as approved.

REASON

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policies DMEI 11 and DMEI 12 Hillingdon Local Plan Part 2 (2020).

10 NONSC Imported Soils

No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority. All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.

REASON

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and

ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policies DMEI 11 and DMEI 12 Hillingdon Local Plan Part 2 (2020).

11 COM31 Secured by Design

The building and car park areas shall achieve 'Secured by Design' accreditation awarded by the Hillingdon Metropolitan Police Crime Prevention Design Adviser (CPDA) on behalf of the Association of Chief Police Officers (ACPO). No building shall be occupied until accreditation has been achieved.

REASON

In pursuance of the Council's duty under section 17 of the Crime and Disorder Act 1998 to consider crime and disorder implications in exercising its planning functions; to promote the well being of the area in pursuance of the Council's powers under section 2 of the Local Government Act 2000 to ensure the development provides a safe and secure environment in accordance with Hillingdon Local Plan Part 2 policy DMHB 15 and London Plan (2016) Policies 7.1 and 7.3.

12 NONSC Maximum Building Heights

No building or structure of the development hereby permitted shall exceed 67.95m AOD.

REASON

In the interests of aircraft safety in compliance with Policy DMAV 1 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020).

13 NONSC Bird Hazard Management Plan

Prior to above ground works, a Bird Hazard Management Plan shall be submitted to and approved in writing by the Local Planning Authority in consultation with Heathrow Airport Limited and the Ministry of Defence. The submitted plan shall include details of:

- management of any flat/shallow pitched on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design'

The Bird Hazard Management Plan shall be implemented as approved and shall remain in force for the life of the building.

REASON

In the interests of aircraft safety in compliance with Policy DMAV 1 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020).

14 NONSC Crane Operation Plan

Prior to the commencement of development a Crane Operation Plan shall be submitted to and approved in writing by the Local Planning Authority, in consultation with the Ministry of Defence (RAF Northolt) and Heathrow Airport Limited. The submitted plan shall include details of:

- cranes and other tall construction equipment (including the details of obstacle lighting) - Such schemes shall comply with Advice Note 4 'Cranes and Other Construction Issues'(available at www.aoa.org.uk/policy-campaigns/operations-safety).

The approved Crane Operation Plan (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

REASON

In the interests of aircraft safety in compliance with Policy DMAV 1 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020).

15 NONSC Service and Delivery Plan

Prior to occupation of the development, a Service and Delivery Plan and a Site Waste Management Plan shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, servicing, delivery and collection or refuse shall be carried out as agreed within this approved plan.

REASON

To ensure appropriate servicing of the site, to safeguard highway safety, and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

16 NONSC Construction Logistics Plan

Prior to development commencing, the applicant shall submit a Construction Logistics Plan to the Local Planning Authority for its approval. The plan shall detail:

- (i) The phasing of development works
- (ii) The hours during which development works will occur.
- (iii) Measures to prevent mud and dirt tracking onto footways and adjoining roads (including wheel washing facilities).
- (iv) Traffic management and access arrangements (vehicular and pedestrian) and parking provisions for contractors during the development process (including measures to reduce the numbers of construction vehicles accessing the site during peak hours).
- (v) Measures to reduce the impact of the development on local air quality and dust through minimising emissions throughout the construction process.
- (vi) The storage of construction materials on site.

The approved details shall be implemented and maintained throughout the duration of the demolition and construction process.

REASON

To safeguard the amenity of surrounding areas in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

17 NONSC Operating Hours

The commercial premises shall not be open for customers outside the following hours: -
0800 and 2300 Mondays - Fridays
0800 to 2300 Saturdays
1000 to 1800 Sundays, Public or Bank Holidays.

Servicing and Deliveries to the commercial premises shall not take place outside the following hours: -
0900 and 1700 on any day.

REASON

To safeguard the residential amenity of the occupiers of adjoining and nearby properties in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) and to ensure appropriate servicing of the site, to safeguard highway safety, and to safeguard the free flow of traffic, in accordance with Policies DMT 1 and DMT 2 of the Hillingdon Local Plan: Part 2 Development Management

Policies (January 2020).

18 NONSC Low Emission Strategy

Prior to above ground works a Low Emission Strategy (LES) shall be submitted to and approved in writing by the Local Planning Authority. The LES shall be linked to and consistent with the Travel Plan and address

1) the fleet composition associated with the A1/A2/A3/A5/B1 Use Classes of the proposed development to be Euro 6/VI or cleaner (e.g. electric) or have implemented retrofitting devices that will enable compliance with such Euro standards.

2) the supply of energy to the proposed development. Any CHP or gas boiler will have to conform with the London Ultra Low NOx requirements;

The strategy shall detail the steps that will be followed in addressing the lower emissions requirements stated above and what measures will be taken to take into account future changing standards and available technologies and be updated accordingly in agreement with the local planning authority.

3) an electric vehicle fast charging bay. This is to be implemented as part of the proposal with a minimum of the number of charging points required in the London Plan.

4) a clear and effective strategy to encourage residents/ staff / users to

a) use public transport;

b) cycle / walk to work where practicable;

c) enter car share schemes;

d) purchase and drive to work zero emission vehicles.

The measures in the agreed scheme shall be maintained throughout the life of the development.

REASON

As the application site is within an Air Quality Management Area and Focus Area and to reduce the impact on air quality in accordance with policy EM8 of the Local Plan: Part 1 (November 2012), Policy DME1 14 of the London Borough of Hillingdon Local Plan Part 2 - Development Management Policies (January 2020), the London Borough of Hillingdon Air Quality Local Action Plan 2019-2024, London Plan (2016) Policy 7.14, and paragraph 170 of the National Planning Policy Framework (2019).

19 NONSC Air Quality - Construction

1. No development shall commence until proof of the registration in GLA's database (nrmm.london/nrmm/about/what-nrmm-register) and compliance with the London's Low Emission Zone for non-road mobile machinery requirements is submitted to and approved in writing by the Local Planning Authority.

2. The London's Low Emission Zone for non-road mobile machinery to comply with the standards set out at Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction and Demolition'.

3. This will apply to both variable and constant speed engines for both NOx and PM. These standards will be based upon engine emissions standards set in EU Directive 97/68/EC and its subsequent amendments.

REASON

Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements as of 1st September 2015, and London Plan Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction and Demolition' (2014).

20 NONSC Noise 1

Prior to commencement of any works above first floor slab level a scheme of mitigation

shall be submitted to and approved by the Local Planning Authority which would allow the following noise criteria to be achieved with windows closed and adequate ventilation provided.

- Daytime (living rooms) 35dB LAeq,T
- Night-time (Bedrooms) 30dB LAeq,T
- 45dB LAm_{ax}

The details shall be implemented as approved and shall remain in force for the life of the building.

REASON

To safeguard the amenity of surrounding areas in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

21 NONSC Noise 2

Prior to commencement of any works above first floor slab level an assessment of Acoustics Ventilation and Overheating should be submitted to and approved by the Local Planning Authority to demonstrate suitable amenity for future residents can be achieved with proposed ventilation and overheating control measures in place. The details shall be implemented as approved and shall remain in force for the life of the building.

REASON

To safeguard the amenity of surrounding areas in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

22 NONSC Noise 3

Any noise associated with fixed mechanical plant on/in the building shall fall at least 10dB below the monitored representative background noise level in terms of LA90 when measured at a location 1m from the facade the of nearest identified noise sensitive receptors.

REASON

To safeguard the amenity of surrounding areas in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) and Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012).

23 NONSC Fire Strategy

The principles of the submitted Fire Strategy Report shall be implemented on site in conjunction with a suitably qualified consultant. Thereafter the development shall not be carried out other than in accordance with the approved details.

REASON

To ensure that the development meets Fire Safety Standards in accordance with policy D12 of the draft London Plan (Intend to Publish version 2019).

24 NONSC Parking Allocation Plan

Prior to occupation of the development, a Parking Allocation Plan shall be submitted to and approved in writing by the Local Planning Authority. Thereafter, the parking shall be for residential use of the flats and ancillary commercial use hereby approved and as agreed within the Parking Allocation Plan.

REASON

To ensure availability and management of parking, in accordance with Policy DMT 6 of the

Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) and policies 6.3 and 6.13 of the London Plan (2016).

25 NONSC M4(2)/M4(3) Dwellings

The development hereby approved shall ensure that 10% (34) of the residential units are constructed to meet the standards for Category 3 M4(3) dwelling (including 9 of the affordable housing units) with a floor plan at no less than 1:100 submitted for each of the different M4(3) units and agreed in writing by the Local Planning Authority. All details, to include transfer zones, wheelchair storage area, and other spatial requirements within bedrooms, bathrooms, living and dining areas, should be shown on a separate plan for every different unit type. All remaining units designed to the standards for Category 2 M4(2) dwelling, as set out in Approved Document M to the Building Regulations (2010) 2015, and all such provisions shall remain in place for the life of the building.

REASON

To ensure an appropriate standard of housing stock in accordance with London Plan (2016) Policy 3.8 d, is achieved and maintained.

26 NONSC Non Standard Condition

Notwithstanding the plans hereby approved, the signage shown on the plans is not approved and requires separate advertisement consent.

REASON

To comply with the Town and Country Planning Act 1990.

INFORMATIVES

1 I52 Compulsory Informative (1)

The decision to GRANT planning permission has been taken having regard to all relevant planning legislation, regulations, guidance, circulars and Council policies, including The Human Rights Act (1998) (HRA 1998) which makes it unlawful for the Council to act incompatibly with Convention rights, specifically Article 6 (right to a fair hearing); Article 8 (right to respect for private and family life); Article 1 of the First Protocol (protection of property) and Article 14 (prohibition of discrimination).

2 I53 Compulsory Informative (2)

The decision to GRANT planning permission has been taken having regard to the policies and proposals in the Hillingdon Local Plan Part 1 (2012) and Part 2 (2020) set out below, including Supplementary Planning Guidance, and to all relevant material considerations, including The London Plan - The Spatial Development Strategy for London consolidated with alterations since 2011 (2016) and national guidance.

DMCI 3	Public Open Space Provision
DMCI 4	Open Spaces in New Development
DMCI 5	Childrens Play Area
DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy

DMEI 9	Management of Flood Risk
DMH 1	Safeguarding Existing Housing
DMH 2	Housing Mix
DMH 7	
DMHB 1	Heritage Assets
DMHB 10	High Buildings and Structures
DMHB 11	Design of New Development
DMHB 12	Streets and Public Realm
DMHB 14	Trees and Landscaping
DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMHB 19	Play Space
DMHB 3	Locally Listed Buildings
DMHB 4	Conservation Areas
DMT 5	Pedestrians and Cyclists
DMT 6	Vehicle Parking
DMAV 1	Safe Operation of Airports
LPP 2.13	(2016) Opportunity Areas and Intensification Areas
LPP 2.17	(2016) Strategic Industrial Locations
LPP 2.6	(2016) Outer London: vision and strategy
LPP 2.8	(2016) Outer London: Transport
LPP 3.1	(2016) Ensuring equal life chances for all
LPP 3.9	(2016) Mixed and Balanced Communities
LPP 4.4	(2016) Managing Industrial Land and Premises
LPP 5.1	(2016) Climate Change Mitigation
LPP 5.10	(2016) Urban Greening
LPP 5.11	(2016) Green roofs and development site environs
LPP 5.12	(2016) Flood risk management
LPP 5.13	(2016) Sustainable drainage
LPP 5.14	(2016) Water quality and wastewater infrastructure
LPP 5.15	(2016) Water use and supplies
LPP 5.2	(2016) Minimising Carbon Dioxide Emissions
LPP 5.21	(2016) Contaminated land
LPP 5.3	(2016) Sustainable design and construction
LPP 5.6	(2016) Decentralised Energy in Development Proposals
LPP 5.7	(2016) Renewable energy
LPP 5.8	(2016) Innovative energy technologies
LPP 6.1	(2016) Strategic Approach
LPP 6.10	(2016) Walking
LPP 6.13	(2016) Parking
LPP 6.3	(2016) Assessing effects of development on transport capacity
LPP 6.5	(2016) Funding Crossrail and other strategically important transport infrastructure
LPP 6.7	(2016) Better Streets and Surface Transport
LPP 6.9	(2016) Cycling
LPP 7.1	(2016) Lifetime Neighbourhoods
LPP 7.15	(2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.

LPP 7.2	(2016) An inclusive environment
LPP 7.3	(2016) Designing out crime
LPP 7.4	(2016) Local character
LPP 7.5	(2016) Public realm
LPP 7.6	(2016) Architecture
LPP 7.7	(2016) Location and design of tall and large buildings
LPP 7.8	(2016) Heritage assets and archaeology
LPP 7.9	(2016) Heritage-led regeneration
LPP 8.1	(2016) Implementation
LPP 8.2	(2016) Planning obligations
LPP 8.3	(2016) Community infrastructure levy

3 170 LBH worked applicant in a positive & proactive (Granting)

In dealing with the application the Council has implemented the requirement in the National Planning Policy Framework to work with the applicant in a positive and proactive way. We have made available detailed advice in the form of our statutory policies from Local Plan Part 1, Local Plan Part 2, Supplementary Planning Documents, Planning Briefs and other informal written guidance, as well as offering a full pre-application advice service, in order to ensure that the applicant has been given every opportunity to submit an application which is likely to be considered favourably.

4 173 Community Infrastructure Levy (CIL) (Granting Consent)

Under the terms of the Planning Act 2008 (as amended) and Community Infrastructure Levy Regulations 2010 (as amended), this development is liable to pay the London Borough of Hillingdon Community Infrastructure Levy (CIL) and the Mayor of London's Community Infrastructure Levy (CIL). This will be calculated in accordance with the London Borough of Hillingdon CIL Charging Schedule 2014 and the Mayor of London's CIL Charging Schedule 2012. Before commencement of works the development parties must notify the London Borough of Hillingdon of the commencement date for the construction works (by submitting a Commencement Notice) and assume liability to pay CIL (by submitting an Assumption of Liability Notice) to the Council at planning@hillingdon.gov.uk. The Council will then issue a Demand Notice setting out the date and the amount of CIL that is payable. Failure to submit a valid Assumption of Liability Notice and Commencement Notice prior to commencement of the development may result in surcharges being imposed.

The above forms can be found on the planning portal at: www.planningportal.gov.uk/planning/applications/howtoapply/whattosubmit/cil

Pre-Commencement Conditions: These conditions are important from a CIL liability perspective as a scheme will not become CIL liable until all of the pre-commencement conditions have been discharged/complied with.

5

The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting, roosting or loafing must be dispersed by the owner/occupier when detected or when

requested by Heathrow Airside Operations staff. In some instances, it may be necessary to contact Heathrow Airside Operations staff before bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof.

The breeding season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Natural England before the removal of nests and eggs.

6

Wind Turbines can impact on the safe operation of aircraft through interference with aviation radar and/or due to their height. Any proposal that incorporates wind turbines must be assessed in more detail to determine the potential impacts on aviation interests. This is explained further in Advice Note 7, 'Wind Turbines and Aviation' available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>

7

The development is close to the airport and the landscaping which it includes may attract birds which in turn may create an unacceptable increase in birdstrike hazard. Any such landscaping should, therefore, be carefully designed to minimise its attractiveness to hazardous species of birds.

Your attention is drawn to Advice Note 3, 'Potential Bird Hazards: Amenity Landscaping and Building Design' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>)

8

For additional guidance please use the following links:

Construction Logistic Plans:-

<http://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf>

Service and Delivery Plans:-

<http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf>

9

Informative provided by Thames Water:

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimise the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

10

Please note that separate Advertisement consent is required for any advert or signage proposed as part of the development, including the 'One Vinyl Square' sign shown on the Proposed Easter Elevation as per drawing number 01659-JTP-EL-002 Rev P1.

3. **CONSIDERATIONS**

3.1 Site and Locality

The application site is located within the wider development area known as The Old Vinyl Factory (TOVF). Within TOVF the application site is directly to the south of Blyth Road, to the west of Vinyl Square and the new University Technical College building. To the south is The Music Box multi storey car park. The wider TOVF area 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. Close to the site on the opposite the site on Blyth Road lies the Grade II Listed Enterprise House, an eight storey 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.

The site has a TfL PTAL rating of 1b/2, as existing, but due to transport improvements, the site is earmarked to have a PTAL rating of 4 in 2021/22 with the introduction of the Elizabeth Line and new bus capacity. The Council's Highways Engineer has confirmed their agreement to these ratings. This is relevant with regard to how residents/users will travel to/from the site, along with ensuing an appropriate level of car parking and density is provided.

The Old Vinyl Factory (TOVF) 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.

In the adopted Local Plan: Part 2 - Site Allocations, the site is allocated under Policy SA 2. This allocation is for the wider redevelopment of the Old Vinyl Factory site for residential-led mixed use.

The site itself is currently cleared and contains no landscaping, parking or other uses. It is enclosed by high level hoarding.

The application site is situated within an Air Quality Management Area, the Hayes Air Quality Focus Area and is within a Developed Area. It is also adjacent to The Botwell: Thorn EMI Conservation Area.

3.2 Proposed Scheme

The proposed development is for 134 residential units which would be split across the following mix:

Studio x 11 units (8.2%)
1 Bed x 41 units (30.6%)
2 Bed x 60 units (44.8%)
3 Bed x 22 units (16.4%)
Total = 134 Units

Of these units the following are proposed as affordable housing:

1 bed x 10 units
2 bed x 6 units
3 bed x 20 units
Total = 36 affordable housing units

In relation to habitable rooms this equates to 138 of the total habitable rooms (394), which

is 35%. The affordable tenure split by habitable room is 67% intermediate and 33% affordable rent. One third (3 maisonette units) of the affordable rent is proposed as London Affordable rent, which equates to 11% by habitable room.

The proposed residential units would be within a new building that would be part 11, part 10 and part 9 storeys in height. In addition to maisonette residential properties on the ground floor an ancillary commercial unit is also proposed for 395sqm (GIA) of flexible commercial space, to accommodate A1/A2/A3/A5/B1 uses. This unit is proposed to open out onto the landscaped Vinyl Square, which has been granted planning consent under application reference 59872/APP/2019/784. Also proposed on the ground floor is Resident's Lounge and large area of cycle parking with a proposed 'cycle hub' for maintenance.

An external podium garden and internal games space are proposed on the first floor level along with the upper floors of the maisonettes and further residential units. Levels 2- 8 are purely residential whilst at Level 9 and above roof terraces are proposed that would include 'growing gardens' for residents alongside soft landscaping and seating areas.

The development proposes 2984.8m² of outdoor amenity space for future residents. This is split between 1925.5m² (64.5%) as balconies/private gardens and 1059.3m² (39.5%) as communal spaces. This excludes the access residents will also have to the play space at Vinyl Square and the wider public realm within TOVF. The development also includes the provision of 75.3m² of internal communal floorspace.

The proposed architectural language is noted as 'warehouse feel' with a regular fenestration/balcony arrangement and mostly brick as the external facade material. Signage and metalwork detail is also proposed.

Vehicular access to the site is proposed from Blyth Road via the internal road layout, which have been laid out as part of the wider TOVF masterplan. In terms of servicing, a loading bay is proposed adjacent to the south side of the building to accommodate deliveries and servicing associated with the development (but signage will be subject to separate advert consent).

The proposed development will provide 68 car parking spaces comprising 66 residential spaces and 2 spaces for the commercial element. There are 8 disabled spaces proposed (6% of total accessible homes, with the potential to increase to up to 10% subject to demand). Electric Vehicle Charging Points (EVCP) will be provided, this will include 14 'active' spaces comprising 20% of the total parking provision, with the remaining 80% to be provided as 'passive' spaces.

Two motorcycle parking bays will also be provided to the south of the proposed building. In terms of cycle parking, the proposed development will provide a total of 238 cycle spaces including 16 Sheffield stands; six of the Sheffield stands can also accommodate larger bikes such as tricycles or recumbent bikes.

3.3 Relevant Planning History

59872/APP/2012/1838 The Old Vinyl Factory Site Blyth Road Hayes

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.

Decision: 19-04-2013 Approved

59872/APP/2013/3775 The Old Vinyl Factory Site Blyth Road Hayes

Variation of Condition 4 (Phasing) of planning permission 59872/APP/2012/1838 dated 19/04/2013, to allow variations to phasing of approved development to allow the Boilerhouse and the Material Store to come forward as Phases 1 and 2, and to allow the Veneer Store and/or Record Stack carparks to come forward earlier than in the approved phasing.

Decision: 18-03-2014 Approved

59872/APP/2015/1329 The Old Vinyl Factory Blyth Road Hayes

Approval of reserved matters relating to the appearance and the landscaping of Phase 2 of The Old Vinyl Factory Masterplan: The Material Store as required by Conditions 2 and 3 of planning permission ref. 59872/APP/2013/3775.

Decision: 16-07-2015 Approved

59872/APP/2015/1798 The Old Vinyl Factory Blyth Road Hayes

Construction of a 4-storey University Technical College (UTC) on 'The Picturehouse' development plot together with associated improvements, including car and cycle parking, vehicular drop-off/pick-up zone formed off Blyth Road, landscaping and the provision of an electricity substation enclosure to the front.

Decision: 17-08-2015 Approved

59872/APP/2015/2189 Record Store, The Old Vinyl Factory Blyth Road Hayes

Amendments to the public realm and landscaping strategy surrounding the Record Store.

Decision: 07-08-2015 Approved

59872/APP/2015/3991 Material Store, The Old Vinyl Factory Blyth Road Hayes

Approval of reserved matters relating to the appearance and the landscaping of Phase 2 of The Old Vinyl Factory Masterplan: The Material Store as required by Conditions 2 and 3 of planning permission ref. 59872/APP/2013/3775.

Decision: 07-01-2016 Approved

59872/APP/2016/1930 The Old Vinyl Factory Blyth Road Hayes

Reserved Matters Application regarding the appearance and landscaping for Phase 5 'The Music Box' (formerly the Record Stack) of The Old Vinyl Factory site, as required by Conditions 2 and 3 of planning permission ref. 59872/APP/2013/3775 dated 31/07/2014.

Decision: 16-12-2016 Approved

59872/APP/2018/1107 The Old Vinyl Factory Blyth Road Hayes

Reserved Matters Application regarding the appearance and landscaping for Phase 3B 'The Assembly Buildings' of The Old Vinyl Factory site, as required by Conditions 2 and 3 of planning permission ref. 59872/APP/2013/3775 dated 31/07/2014.

Decision: 04-12-2018 Approved

59872/APP/2019/784 The Old Vinyl Factory Blyth Road Hayes

Phased refurbishment and installation of two mezzanine floors within the existing Powerhouse and construction of a two-storey extension to the north to create Class B1 floorspace and cafe (Use Class A3), with associated landscaping, lighting, access and parking together with detailed public realm and landscaping for Vinyl Square and the permanent siting of the Nipper the Dog sculpture, plus additional soft landscaping works to the south of Blyth Road.

Decision: 17-07-2019 Approved

Comment on Relevant Planning History

The application site forms part of TOVF masterplan which was granted outline planning permission on 19 April 2013 (59872/APP/2012/1838) for a:

"Mixed use development of the Old Vinyl Factory site including demolition of up to 12,643sqm of buildings and construction of up to 112,953sqm (112,953sqm includes the retention and reuse of 784sqm 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 GEA) up to 7,886sqm of new B1 floorspace, up to 4,000sqm of A class uses (A1,A2,A3,A4,A5), up to 4,700sqm of D1 and D2 uses, an energy centre (up to 950sqm), car parking, works to access and creation of new accesses and landscaping".

Following this approval (ref. 59872/APP/2012/1838), a s73 application was submitted to allow variations to the phasing of the development. This was to enable the Boiler House and the Material Store Buildings to come forward as Phases 1 and 2 and the Veneer Store and/or Record Stack (now known as the Music Box) car parks to come forward earlier than was previously approved. These amendments were approved on 31 July 2014 (ref. 59872/APP/2013/3775), following a variation to the S106 agreement. Reserved matters for the Boiler House, Veneer Store, Powerhouse and the Material Store were approved between December 2013 and August 2015. Following this, reserved matters for the Music Box and Assembly Buildings were approved in December 2016 and December 2018 respectively. In October 2016 a separate full planning application was submitted for the Machine Store and Pressing Plant (ref. 59872/APP/2016/3454), comprising 81 residential units, a health centre and a 3-screen cinema. This was approved (with an accompanying S106 agreement) in January 2018.

In April 2019, a separate full planning application was submitted for the Powerhouse and landscaping to Vinyl Square (ref. 59872/APP/2019/784) "Phased refurbishment and installation of two mezzanine floors within the existing Powerhouse and construction of a two-storey extension to the north to create B1 floorspace and a cafe (Class A3), with associated landscaping, lighting, access and parking together with detailed public realm

and landscaping for Vinyl Square and the permanent siting of the Nipper the Dog sculpture." This application was approved on 19 November, subject to a s106 agreement.

The application site for the current application is referred to in the outline planning permission as the Veneer Building, which formed phase 7 of TOVF masterplan. The building was identified for a residential-led development with commercial at ground floor; the illustrative scheme shows two ground floor commercial units, a restaurant (487sqm) and an office (454sqm) at ground level, plus 88 residential units. The approved outline parameters for the Veneer Building comprised a building of up to 11-storeys in height (maximum AOD of +66.90, excluding lift overruns and parapets etc). The Veneer Building was proposed to be the tallest building within TOVF masterplan, as a focal point and landmark to this entry point into TOVF, and Vinyl Square. The site comprises the key built frontage onto Vinyl Square, the largest public open space within TOVF site.

Under the outline planning permission, there was no requirement for affordable housing to be delivered within the Veneer Building phase of the masterplan, as the affordable housing was to be solely provided within Phase 3B (The Assembly Buildings). The time period set under the extant outline planning permission for the submission of reserved matters applications has now lapsed (expired as of April 2018), hence the submission of a full planing application for the current proposals. The approved outline masterplan and the associated parameters do, however, form a material considerations in the assessment of the proposed development, and provide important context to the building now proposed as 1 Vinyl Square.

4. Planning Policies and Standards

London Borough of Hillingdon Development Plan

Planning law requires that applications for planning permission be determined in accordance with the development plan, unless material considerations indicate otherwise.

The Development Plan for the London Borough of Hillingdon currently consists of the following documents:

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)
West London Waste Plan (2015)
The London Plan - Consolidated With Alterations (2016)

The National Planning Policy Framework (NPPF) (2019) is also a material consideration in planning decisions, as well as relevant supplementary planning documents and guidance.

Emerging Planning Policies

Paragraph 48 of the National Planning Policy Framework (NPPF) 2019 states that 'Local Planning Authorities may give weight to relevant policies in emerging plans according to:

- (a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);
- (b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- (c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework,

the greater the weight that may be given).

Draft London Plan (Intend to Publish Version, December 2019)

The GLA consulted upon a draft new London Plan between December 2017 and March 2018 with the intention of replacing the previous versions of the existing London Plan. The Plan was subject to examination hearings from February to May 2019, and a Consolidated Draft Plan with amendments was published in July 2019. The Panel of Inspectors appointed by the Secretary of State issued their report and recommendations to the Mayor on 8th October 2019.

The Mayor has considered the Inspectors' recommendations and, on 9th December 2019, issued to the Secretary of State his intention to publish the London Plan along with a statement of reasons for the Inspectors' recommendations that the Mayor did not wish to accept. The Secretary of State responded on the 13th March 2020 and stated that he was exercising his powers under section 337 of the Greater London Authority Act 1999 to direct that modifications are required. These are set out at Annex 1 of the response, however the letter does also state that if the Mayor can suggest alternative changes to policies that would address the concerns raised, these would also be considered.

More limited weight should be attached to draft London Plan policies where the Secretary of State has directed modifications or where they relate to concerns raised within the letter. Greater weight may be attached to policies that are not subject to modifications from the Secretary of State or that do not relate to issues raised in the letter.

UDP / LDF Designation and London Plan

The following Local Plan Policies are considered relevant to the application:-

Part 1 Policies:

- PT1.BE1 (2012) Built Environment
- PT1.CI1 (2012) Community Infrastructure Provision
- PT1.EM1 (2012) Climate Change Adaptation and Mitigation
- PT1.EM4 (2012) Open Space and Informal Recreation
- PT1.EM6 (2012) Flood Risk Management
- PT1.EM7 (2012) Biodiversity and Geological Conservation
- PT1.EM8 (2012) Land, Water, Air and Noise
- PT1.H1 (2012) Housing Growth
- PT1.HE1 (2012) Heritage
- PT1.T1 (2012) Accessible Local Destinations

Part 2 Policies:

- DMCI 3 Public Open Space Provision
- DMCI 4 Open Spaces in New Development
- DMCI 5 Childrens Play Area

DMCI 7	Planning Obligations and Community Infrastructure Levy
DMEI 1	Living Walls and Roofs and Onsite Vegetation
DMEI 10	Water Management, Efficiency and Quality
DMEI 11	Protection of Ground Water Resources
DMEI 12	Development of Land Affected by Contamination
DMEI 14	Air Quality
DMEI 2	Reducing Carbon Emissions
DMEI 3	Decentralised Energy
DMEI 9	Management of Flood Risk
DMH 1	Safeguarding Existing Housing
DMH 2	Housing Mix
DMH 7	
DMHB 1	Heritage Assets
DMHB 10	High Buildings and Structures
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DMHB 15	Planning for Safer Places
DMHB 16	Housing Standards
DMHB 17	Residential Density
DMHB 18	Private Outdoor Amenity Space
DMHB 19	Play Space
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LPP 4.4	(2016) Managing Industrial Land and Premises
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LPP 5.10	(2016) Urban Greening
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- LPP 5.13 (2016) Sustainable drainage
- LPP 5.14 (2016) Water quality and wastewater infrastructure
- LPP 5.15 (2016) Water use and supplies
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- LPP 5.21 (2016) Contaminated land
- LPP 5.3 (2016) Sustainable design and construction
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- LPP 6.1 (2016) Strategic Approach
- LPP 6.10 (2016) Walking
- LPP 6.13 (2016) Parking
- LPP 6.3 (2016) Assessing effects of development on transport capacity
- LPP 6.5 (2016) Funding Crossrail and other strategically important transport infrastructure
- LPP 6.7 (2016) Better Streets and Surface Transport
- LPP 6.9 (2016) Cycling
- LPP 7.1 (2016) Lifetime Neighbourhoods
- LPP 7.15 (2016) Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes.
- LPP 7.2 (2016) An inclusive environment
- LPP 7.3 (2016) Designing out crime
- LPP 7.4 (2016) Local character
- LPP 7.5 (2016) Public realm
- LPP 7.6 (2016) Architecture
- LPP 7.7 (2016) Location and design of tall and large buildings
- LPP 7.8 (2016) Heritage assets and archaeology
- LPP 7.9 (2016) Heritage-led regeneration
- LPP 8.1 (2016) Implementation
- LPP 8.2 (2016) Planning obligations
- LPP 8.3 (2016) Community infrastructure levy

5. Advertisement and Site Notice

- 5.1** Advertisement Expiry Date:- **5th January 2020**
- 5.2** Site Notice Expiry Date:- Not applicable

29th January 2020

6. Consultations

External Consultees

Consultation letters were sent to 169 local owner/occupiers on 10/12/19. The application was also advertised by way of site and press notices. No responses were received from local residents. The following consultation responses have been received:

GREATER LONDON AUTHORITY (GLA) - STAGE ONE RESPONSE (Conclusions Summary)

Principle of development:

The residential-led mixed-use redevelopment is an optimisation of this brownfield site and strongly supported.

Housing and affordable housing:

The applicant is proposing a 36% affordable housing offer with a 67:33 tenure split in favour of intermediate products, which must be considered via the viability tested route. GLA officers are rigorously scrutinising the FVA to ensure that the optimum affordable housing tenure split is secured in response to local need. Early and late stage reviews must be secured by Section 106 legal agreement unless the LPA is wholly satisfied with the balance of tenures in this regard.

Urban design:

The height, massing, and architecture are supported, and no harm will be caused to the setting of nearby heritage assets. Further consideration is required in terms of the ground level layout, particularly the western and southern frontages. Details of materials must be robustly secured by condition to ensure a high quality of design is delivered.

Transport:

The provision of car parking should be reduced and justified. Relocation of the short stay visitor parking should be reconsidered, and the blue badge provision must be revisited to improve the offering. New surveys should be undertaken to validate results of the original assessment and additional mitigation may be required. The proposal should provide specific initiatives to address and deliver the 10 Healthy Streets Indicators.

Sustainable development:

While the proposal broadly follows the energy hierarchy, it does not currently comply with London Plan and London Plan Intend to Publish Version policies. Further information and justification are required in respect of energy, urban greening, and air quality.

TRANSPORT FOR LONDON (TfL) (dated 20th February 2020)

Strategic Summary

- Car Parking must be reduced and justified, the blue badge provision must be revisited to improve the offering.
- An updated Car Parking Management Plan for the whole Masterplan area must be provided
- Relocation of short stay visitor parking should be considered
- New surveys should be undertaken to validate the results of the original assessment
- Additional mitigation may be required if this impact exceeds the previously agreed levels
- The proposals should provide specific initiatives to address and deliver the 10 Healthy Streets Indicators, as opposed to relying on wider policy objectives.

Site and surroundings

The site lies c.500m west from Hayes & Harlington station (in future to be served by Elizabeth line services) and within walking distance to several bus routes. The Public Transport Access Level (PTAL) of the site will with Elizabeth Line rise to 4, based on a scale of 0 to 6b where 1 is lowest and 6b is highest.

The site lies within the Hayes Town Centre Housing Zone, designated in 2016. Housing zones are designed to support delivery of homes, for example through ensuring the delivery of infrastructure required to maximise housing density.

Car Parking

Since the GLA pre-app of August 2019, and against TfL advice, the car parking has been increased to the maximum policy ratio of 0.5 which must be justified. The previously requested justification and supporting evidence have not been provided and as such the proposals are considered contrary to Policies T1, T2 and T6 and are therefore not supported and must be substantially reduced.

Given the abundance of space allocated to car parking on site the proposed blue badge locations are not supported as they remove previously proposed public realm and could be located closer to the residential entrance. We would suggest that these are located within the Veneer store, even if this means losing some spaces overall.

It is noted that a revision C of the car parking plan was uploaded for consultation on 17/02/2020, these proposals do not demonstrate how the required 10% provision could be provided and are therefore contrary to policy T6.

We also note that these proposals require the amendment of the red line boundary of the already consented Veneer Store, this will require an application to vary the currently consented scheme and details of all changes to the consented scheme must be provided.

An updated Parking Management plan is required to understand the latest position on parking allocation, and the previously requested occupancy survey, justification and supporting evidence must be provided.

Cycling

238 long stay residential cycle spaces are proposed. These consist of 222 two-tier and 16 Sheffield stands, six of which will be provided as larger spaces suitable for use by accessible cycles.

While the overall provision is in compliance with policy T5 we would like to see the short stay residential visitor parking relocated from Blyth Road to provide more convenient access to the building entrance.

Transport Assessment

These proposals represent an uplift of 21% compared to the originally assessed levels of residential development which have been taken up with uplifts on other plots within the site.

While the methodology of assessing the additionality is supported a much more robust impact assessment is required. The TA should be demonstrating why no material impact is to be expected, rather than just stating or assuming that this is the case.

TfL would like to see the TA supported by a new survey of the development already implemented in addition to the previously mentioned car park occupancy survey. This should record and compare forecast vehicular volumes and mode share to demonstrate that its impact is within the assessment envelope established at the time of the original assessment. Trip rate data for the development already implemented should be obtained and used instead of TRICS data. Additional mitigation may be required to support development outside of the previously agreed impact levels.

For the above reasons the Transport assessment does not currently comply with the requirements of Policy T4.

Healthy Streets

Some of the identified areas for improvement are totally incompatible with the car dominated development and excessive parking within the Masterplan area. For example "A reduction in the reliance of the private vehicle is required, in line with the Mayors Transport Strategy and TfL aspirations" and "The future aspirations to reduce vehicle numbers on local roads will make cycling a more appealing mode of transport."

The Healthy Streets Approach requires proposals to demonstrate how proposals will deliver the 10 Healthy Streets indicators and London Plan policy objectives, through parking restraint and prioritisation of non-car modes for example.

Mayor Community Infrastructure Levy (MCIL)

The MCIL2 rate for Hillingdon is £60 per square metre.

TRANSPORT FOR LONDON (TfL) Further comments (dated 26th March 2020)

The revised parking layout (Revision F) provides 68 residential car parking spaces and two commercial parking spaces. This represents a decrease of one residential car parking space and an increase of two commercial parking spaces in comparison to the previous parking layout (Revision C) commented on at Stage 1. The proposed parking ratio at 0.5 spaces per unit is technically compliant with Intend to Publish London Plan standards, however as previously advised, justification for this provision is required.

The applicant has drawn upon 2011 Census data for the local area. This shows that the proposed parking ratio of 0.5 spaces per unit is 17% lower than the prevailing level of car ownership for flats in the local area. However, the data from 2011 is not reflective of the future PTAL of the site; the availability of public transport, including Elizabeth line services, will encourage a far lower demand for private car travel / ownership. Therefore, TfL considers that a reduced parking ratio is appropriate for the site location.

The applicant has set out the consented parking ratios for other plots within the TOVF masterplan ranging between 0.5 and 0.75 spaces per unit. However, the previously requested car park occupancy survey has not been provided to justify the proposals.

The applicant has committed to providing a Car Parking Management Plan for the application site, which should be secured by condition. This should demonstrate how the required 10% disabled parking provision could be provided, in accordance with Policy T6 of the Intend to Publish London Plan.

The provision of two commercial parking spaces has not been justified with reference to the Intend to Publish London Plan.

TfL therefore upholds its view that the overall parking levels are excessive and do not align with the Mayor's ambition of 80% of trips to be made by active travel or public transport (Intend to Publish London Plan Policy T1).

The issues raised in our Stage 1 response regarding Healthy Streets and the request for a new trip generation survey remain valid.

TRANSPORT FOR LONDON (TfL) Final comments

TfL had previously requested a revised trip generation assessment for the TA. However, given that the requested survey (forming the basis of the revised assessment) cannot be undertaken in light of

the current circumstances, the submitted trip generation assessment is considered robust and acceptable.

TfL upholds its position that the proposed car parking provision is excessive and does not align with the Mayor's ambition of 80% of trips to be made by active travel or public transport (Intend to Publish London Plan Policy T1). The proposal site is car-dominated and therefore not compliant with Intend to Publish London Plan Policy T2 - Healthy Streets.

THAMES WATER

Waste Comments

With regard to Surface Water drainage, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website. <https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewater-services>

Thames Water would recommend that petrol / oil interceptors be fitted in all car parking/washing/repair facilities. Failure to enforce the effective use of petrol / oil interceptors could result in oil-polluted discharges entering local watercourses.

We would expect the developer to demonstrate what measures will be undertaken to minimise groundwater discharges into the public sewer. Groundwater discharges typically result from construction site dewatering, deep excavations, basement infiltration, borehole installation, testing and site remediation. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. Should the Local Planning Authority be minded to approve the planning application, Thames Water would like the following informative attached to the planning permission: "A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing wwriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

There are public sewers crossing or close to your development. If you're planning significant work near our sewers, it's important that you minimize the risk of damage. We'll need to check that your development doesn't limit repair or maintenance activities, or inhibit the services we provide in any other way. The applicant is advised to read our guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

Thames Water would advise that with regard to Waste Water Network and Sewage Treatment Works infrastructure capacity, we would not have any objection to the above planning application, based on the information provided.

Case Officers comments:

A Sustainable Urban Drainage Condition is recommended to be attached to any grant of planning consent. The additional advice has been added as an informative.

CROSSRAIL

The implications of the Crossrail proposals for the application have been considered and I write to

inform you that Crossrail Limited does not wish to make any comment on the application as submitted.

NATIONAL AIR TRAFFIC SERVICES (NATS)

The proposed development has been examined from a technical safeguarding aspect and does not conflict with our safeguarding criteria. Accordingly, NATS (En Route) Public Limited Company ("NERL") has no safeguarding objection to the proposal.

HISTORIC ENGLAND

On the basis of the information available to date, we do not wish to offer any comments

GREATER LONDON ARCHAEOLOGICAL ADVISORY SERVICE (GLAAS)

Having considered the proposals with reference to information held in the Greater London Historic Environment Record and/or made available in connection with this application, I conclude that the proposal is unlikely to have a significant effect on heritage assets of archaeological interest.

The Old Vinyl Factory has been subject to two phases of archaeological evaluation in 2013-14 with negative results so this development is unlikely to harm heritage assets of archaeological interest.

No further assessment or conditions are therefore necessary.

HAYES CONSERVATION AREA ADVISORY PANEL

I am writing on behalf of the Hayes Conservation Area Advisory Panel. This property is in the Botwell: Thorn EMI Conservation Area. At its highest the proposed building would be 10 storeys which would make it considerably taller than any of its neighbouring buildings, present or proposed. It is also prominently sited close to Blyth Road.

Overall we think that the proposed building is too tall and massive meaning that it would have a dominating and detrimental effect on its surroundings. The car parking provided at the extreme western end of the site is inconveniently distant from 1 Vinyl Square itself.

HEATHROW AIRPORT LTD (HAL)

The proposed development has been examined from an aerodrome safeguarding perspective and could conflict with safeguarding criteria unless any planning permission granted is subject to the condition detailed below:

Height Limitation on Buildings and Structures

No building or structure of the development hereby permitted shall exceed 67.95m AOD.

Reason: Development exceeding this height would penetrate the Obstacle Limitation Surface (OLS) surrounding Heathrow Airport and endanger aircraft movements and the safe operation of the aerodrome.

See Advice Note 1 'Safeguarding an Overview' for further information (available at www.aoa.org.uk/policy-campaigns/operations-safety).

Submission of a Bird Hazard Management Plan

Development shall not commence until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority. The submitted plan shall include details of:

- management of any flat/shallow pitched on buildings within the site which may be attractive to nesting, roosting and "loafing" birds. The management plan shall comply with Advice Note 8 'Potential Bird Hazards from Building Design'

The Bird Hazard Management Plan shall be implemented as approved on completion of the

development and shall remain in force for the life of the building. No subsequent alterations to the plan are to take place unless first submitted to and approved in writing by the Local Planning Authority.

Reason: It is necessary to manage the roof in order to minimise its attractiveness to birds which could endanger the safe movement of aircraft and the operation of Heathrow Airport.

Information

The Bird Hazard Management Plan must ensure that flat/shallow pitched roofs be constructed to allow access to all areas by foot using permanent fixed access stairs ladders or similar. The owner/occupier must not allow gulls, to nest, roost or loaf on the building. Checks must be made weekly or sooner if bird activity dictates, during the breeding season. Outside of the breeding season gull activity must be monitored and the roof checked regularly to ensure that gulls do not utilise the roof. Any gulls found nesting, roosting or loafing must be dispersed by the owner/occupier when detected or when requested by Heathrow Airside Operations staff. In some instances, it may be necessary to contact Heathrow Airside Operations staff before bird dispersal takes place. The owner/occupier must remove any nests or eggs found on the roof.

The breeding season for gulls typically runs from March to June. The owner/occupier must obtain the appropriate licences where applicable from Natural England before the removal of nests and eggs.

Submission of a Construction Management Strategy

Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority covering the application site and any adjoining land which will be used during the construction period. Such a strategy shall include the following matters:

- details of cranes and other tall construction equipment (including the details of obstacle lighting) - Such schemes shall comply with Advice Note 4 'Cranes and Other Construction Issues'(available at www.aoa.org.uk/policy-campaigns/operations-safety).

The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

Reason: To ensure that construction work and construction equipment on the site and adjoining land does not breach the Obstacle Limitation Surface (OLS) surrounding Heathrow Airport and endanger aircraft movements and the safe operation of the aerodrome.

We will need to object to these proposals unless the above-mentioned conditions are applied to any planning permission.

We would also make the following observations:

Wind Turbines

Wind Turbines can impact on the safe operation of aircraft through interference with aviation radar and/or due to their height. Any proposal that incorporates wind turbines must be assessed in more detail to determine the potential impacts on aviation interests. This is explained further in Advice Note 7, 'Wind Turbines and Aviation' available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>

Landscaping

The development is close to the airport and the landscaping which it includes may attract birds which in turn may create an unacceptable increase in birdstrike hazard. Any such landscaping should, therefore, be carefully designed to minimise its attractiveness to hazardous species of birds.

Your attention is drawn to Advice Note 3, 'Potential Bird Hazards: Amenity Landscaping and Building Design' (available at <http://www.aoa.org.uk/policy-campaigns/operations-safety/>)

It is important that any conditions requested in this response are applied to a planning approval. Where a Planning Authority proposes to grant permission against the advice of Heathrow Airport Ltd, or not to attach conditions which Heathrow Airport Ltd has advised, it shall notify Heathrow Airport Ltd, and the Civil Aviation Authority as specified in the Town & Country Planning (Safeguarded Aerodromes, Technical Sites and Military Explosive Storage Areas) Direction 2002.

MINISTRY OF DEFENCE

The applicant seeks full planning permission for the redevelopment of a currently vacant site to provide a mixed-use development comprising 134 residential units (C3 Use Class), ground floor (commercial floor space flexible A1/A2/A3/A5/B1 Use Class), with associated car parking, cycle parking and landscaping. The development would be delivered in the form of a single building comprised of nine, ten, and eleven storey flat roofed elements, roof terraces are to be provided. The application site is approximately 5.53km from the centre of the runway at RAF Northolt and occupies the statutory aerodrome and birdstrike safeguarding zones surrounding the aerodrome.

I can confirm that, subject to the addition of conditions, the MOD has no safeguarding objections to this proposal.

Birdstrike

The site falls within a statutory safeguarding zone which serves to reduce the risk of birdstrike on aircraft, of particular concern is any development that might result in the creation of habitat or other attractants for large or flocking birds.

The application scheme incorporates roof terraces that include extensive landscaping and which have the potential to attract and support nesting hazardous birds such as gulls, feral pigeons, starlings, and other bird species. Therefore, the MOD has concerns that this has the potential to increase birdstrike risk to aircraft safety at RAF Northolt.

To address the potential of the development to provide a desirable habitat or space for hazardous birds a condition requiring the submission of a bird hazard management plan is requested. It is proposed that the roof terraces will be used as social & activity space with public access. To prevent members of the public feeding the birds the MOD requests appropriate signage is displayed within these areas. Food waste from picnics and outdoor eating also has the potential to provide a food source for hazardous birds such as gulls, and other bird species, we recommend suitable lidded bins are provided within these areas. Landscaping, and specifically plant species selection, have a significant impact on the likelihood that the roof terraces will attract birds. This should be addressed through the Bird Hazard Management Plan and it may be that taller formal planting serves to create a less attractive environment for potentially harmful species.

MOD request that the following condition is attached to any planning permission granted:

No development shall take place until a Bird Hazard Management Plan has been submitted to and approved in writing by the Local Planning Authority, in consultation with MOD. The Bird Hazard Management Plan shall include design measures to minimise any increase in the numbers of hazardous species (primarily large or flocking birds) as a result of the development proposed, in particular provisions to prevent gulls from breeding (using appropriate licensed means) on site should be provided. The development shall be carried out strictly in accordance with the details set out in the approved Bird Hazard Management Plan in perpetuity or until RAF Northolt is no longer operational.

Reason:

To minimise the potential of the works approved to provide a habitat desirable to hazardous large

and/or flocking birds which have the potential to pose a considerable hazard to aviation safety which is exacerbated by the proximity of RAF Northolt. To ensure the development accords with the requirements of policy DMAV1 of the London Borough of Hillingdon Local Plan part 2 - Development Management Policies and paragraphs 95 and 182 of the National Planning Policy Framework (2019)

Cranes

The MOD recognises that cranes may be used during the construction of tall buildings at this site. These may affect the performance of air traffic safety. If the redevelopment of this site does progress, it will be necessary for the developer to liaise with the MOD prior to the erection of cranes or temporary tall structures.

In order to mitigate any detriment to aviation safety as a result of the use of cranes and other tall plant or construction equipment it will be necessary for the developer to liaise with the MOD prior to the erection such temporary tall structures. On that basis, the MOD request a requirement for the submission and approval of a Construction Management Strategy to meet the specification listed below:

Development shall not commence until a construction management strategy has been submitted to and approved in writing by the Local Planning Authority, in consultation with MOD. This construction management strategy shall cover the entirety of the application site and any adjoining land which will be used during the construction period. The strategy shall include the details of cranes and any other tall construction equipment (including the details of obstacle lighting).

The approved strategy (or any variation approved in writing by the Local Planning Authority) shall be implemented for the duration of the construction period.

Reason:

To ensure that construction work and construction equipment on the site and adjoining land does not obstruct air traffic movements or otherwise impede the effective operation of air traffic navigation transmitter/receiver systems. To ensure the development accords with the requirements of policy DMAV1 of the London Borough of Hillingdon Local Plan part 2 - Development Management Policies and paragraphs 95 and 182 of the National Planning Policy Framework (2019).

Case Officers comments:

Conditions limiting maximum building heights and requiring a Bird Hazard Management Plan and Crane Operation Plan are recommended to be attached to any grant of planning consent. These have been agreed with both HAL and the MOD to avoid duplication and ensure the appropriate details are required. The additional advice has been added as informatives.

SECURE BY DESIGN (MET POLICE)

I have met with a representative from this application and discussed the proposal. I do not wish to object to it. However I do request a condition is applied that Secured By Design accreditation is achieved. This will ensure that appropriate security measures are installed that will enable the site to be resilient to the threat of crime that it will face in this locality.

Internal Consultees

POLICY TEAM

Principle of Development

The site is allocated within Policy SA 2 of the LPP2 (2020) for residential-led mixed use development. The proposed development includes the provision of 395sqm (GIA) of flexible A1/A2/A3/A5/B1 floorspace that will face onto Vinyl Square. These uses classes are consistent with those stated within Policy SA 2 of the LPP2 and the original outline permission for this part of the site.

The quantum of A1-A5 and B1 floorspace would not exceed the thresholds set within Policy SA 2

and therefore a sequential test or impact assessment is not required as the proposal is in accordance with an up-to-date plan.

This non-residential floorspace would front onto and help animate Vinyl Square, which is a key area of public realm within the wider masterplan. This non-residential floorspace will likely provide A1-A5 floorspace to support the completed and planned B1 floorspace in the immediate area, which includes the Shipping Building, Cabinet Building, Record Store, Powerhouse and Enterprise House. Alternatively it will provide smaller scale B1 floorspace to compliment these existing planned works. The floorspace has been designed with back of house space, separate cycle parking spaces, refuse storage and a loading bay immediately adjacent to it to ensure its viability. The principle of this proposal is therefore accepted.

Housing Mix

The London Plan (2016) outlines in Policy 3.8 that new developments should offer a range of housing choices, in terms of the mix housing sizes and types, taking account of the housing requirements of different groups. The Intend to Publish Version of the London Plan (2019) continues this notion in Policy H10, outlining that new developments should generally consist of a range of unit sizes. It however is more specific in stating that to determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, decision-makers should have regard to, amongst other things, robust local evidence of need where available.

The LPP2 (2020) Policy DMH 2 also outlines that residential development proposals are required to provide a mix of housing units of different sizes to reflect the Council's latest information on housing need. The Council's Strategic Housing Market Assessment (SHMA) (2016) outlines a borough-wide requirement for predominantly larger private market units, particularly 3 bed homes. With regards to affordable housing, the need is predominantly for 2 and 3 bedroom homes in particular.

The proposal would include 52 (38.8%) one-bedroom units, 60 (44.8%) two-bedroom units and 22 (16.4%) three-bedroom units. The proposal therefore does not mirror the need within the SHMA (2016).

However, Policy H10 also outlines that the nature and location of the site needs to be taken into account, with a higher proportion of one and two bed units generally more appropriate in locations with higher public transport access and connectivity. The nature of the site has largely been predetermined by the original outline for the Old Vinyl Factory, which proposed that the site would be the location for the tallest building with a limited footprint, in turn making it less conducive to family sized accommodation.

The site will be located within a PTAL rating of 4 once Crossrail has been completed at Hayes and Harlington Station, which is considered to be a high level of public transport accessibility.

Noting the restricted nature of the site in particular, the housing mix is considered acceptable. However this should be considered the minimum proportion of three-bedroom units that would be acceptable on this site.

Affordable Housing

The development is proposing 35% affordable housing by habitable room, however the tenure split is not consistent with that outlined within the Development Plan. As outlined in LPP2 (2020) Policy DMH7, the policy compliant tenure mix is 70% social/affordable rent and 30% intermediate housing, which is also consistent with Policy H6 of the Intend to Public Version of the London Plan (2019). The proposal therefore does not meet the criteria for the Fast Track Route for affordable housing and is required to submit a Financial Viability Assessment (FVA).

The applicant's approach of proposing that the affordable units are predominantly achieved on larger

units is in line with the Council's latest evidence of affordable housing need and is therefore supported.

Public Open Space

LPP2 (2020) Policy DMCI 4 outlines that all new major residential development is required to make provision for new or enhanced open space. However, noting that the outline planning application has already established the level of public open space that is to be achieved across the Old Vinyl Factory, it is not considered that there is an opportunity for new open space within this proposal. Whilst not within the boundary of this application, the site is adjacent to the now approved Vinyl Square (59872/APP/2019/784), which is the most significant piece of open space within the site and will provide residents and workers access to public open space.

Private Amenity Space / Child playspace

LPP2 (2020) Policy DMHB 11 outlines that all new residential development is required to provide good quality and useable private outdoor amenity space in accordance with the local standards set out in Table 5.2. The requirement is therefore for 3,200 m² of private outdoor amenity space. This contradicts the 3305 m² stated within the Design and Access Statement.

Regardless, the proposal would not provide sufficient private outdoor amenity to fully comply with Policy DMHB 18, with the Design and Access Statement suggesting that there is only 2,984 m². It is not clear how one has arrived at this figure, as the General Arrangement Plan (Landscaping) does not include any figures or specifically demonstrate what has been included. A view will also need to be taken as to the level of private outdoor amenity available to one of the affordable ground floor maisonettes.

Clarification should be sought on the above in order to determine whether the scheme complies with the Development Plan or whether an on balance view needs to be taken regarding the scheme as a whole, noting in particular the restrictive nature of the site.

ACCESS OFFICER

In assessing this application, reference has been made to London Plan policy 3.1, 3.8 and 7.2, as well as emerging policies D1, D3 and D5, as set out in the latest Draft London Plan.

1. Whilst it is noted that the development is said to be compliant with London Plan policy 3.8 and its prescribed Technical Housing Standards, concern is raised about seven of the proposed nine maisonettes which feature a bedroom on the ground floor. It is unclear whether a wheelchair user could gain access, via the communal lifts, to the living area on the first floor.

2. In any case, within these seven maisonettes, a soft pocket should be formed in the concrete slab to allow the future installation of a through floor wheelchair lift from the ground floor bedroom to the first floor living space. Plans should sufficiently detail how lift access could be achieved if required at some future point.

3. It also remains unclear whether the M4(3) units would be interspersed throughout the development, and across typologies and tenures. 10% of affordable housing units would be required to satisfy the design standards for an M4(3) Wheelchair Accessible unit.

4. The affordable units should be suitable for 'day one occupation' by a wheelchair user. These units should be designed and fitted as per the prescribed standards for a Wheelchair Accessible M4(3) unit, as set out in Approved Document M to the Building Regulations 2010 (2015 edition).

5. Given that the parking ratio is proposed at 0.5 spaces per unit, details are required to ensure adequate provision for the M4(3) units which should each have a parking space within developments where parking is to be provided.

6. Details are required to ensure that door-to-door transport providers, such as Dial-a-Ride and hospital transport, are catered for with a suitable drop-off area close to the principal entrances.

7. Details of the materials palette, with particular attention given to the paver types intended for use within the public realm, should be submitted. A methodology statement should be requested to ensure that materials could be installed in accordance with the tolerances set out in BS8300:2018.

8. A landscaping strategy for the intended roof gardens should detail the accessibility provisions, to include pathway surfacing, seating and play space. Details should include how the proposed non-combustible timber decking satisfies BS 8300:2018 and whether it provides a suitable surface for wheelchair users.

9. Details should be required on the accessible play equipment for disabled children, including those with a sensory impairment, or complex multiple disabilities. Provisions could include outdoor sound tubes, colour and lighting canopies, and other play equipment that could stimulate the olfactory senses. Inclusive play is a key requirement of any new residential development.

Conclusion: unacceptable. Further details should be requested and reviewed again prior to any grant of planning permission.

Case Officer's comments:

The Access Officer's comments were forwarded to the applicant who has provided the following response:

- First floor plans have been updated to show step-free wheelchair access via the lifts/podium to the upper floor living rooms of the x7 maisonettes (M4(2) compliant).
- In relation to forming a soft pocket in the concrete slab of the maisonettes, to allow the future installation of a wheelchair lift from the ground floor bedroom to the first floor living space, we confirm that this was a requirement of Lifetime Homes for multi-storey dwellings, but when Part M4(2) came into force this was superseded and this requirement no longer applies. Not therefore included on plans.
- In relation to the affordable homes being suitable for 'day one occupation' by a wheelchair user, we can confirm that this is a fit-out requirement and the units have been designed to accommodate this; although the 'Adaptable,' rather than 'Accessible' layouts have been shown, the difference relates primarily to bathroom and kitchen configurations and the space would remain as shown on the submitted plans.
- Details to demonstrate adequate parking provision for the M4(3) units, disabled parking provision has been increased to 6% up front and there is potential to increase this to 10% subject to demand. No wheelchair accessible unit being occupied by a disabled resident will therefore be precluded from having a dedicated parking space.
- For a door-to-door transport provider and provision of a suitable drop-off area close to the principal entrances, a loading layby located immediately to the southwest of the building is proposed (residents will be able to enter the building directly via the doors on the southwest facade).
- All external materials will comply with BS8300:2018. The ground floor external paving proposed has been used throughout The Old Vinyl Factory development and ties into existing and proposed applications.
- External surfacing on podium and roof terraces will be a mixture of self-binding gravel and composite decking which will both comply with BS8300:2018. A range of external seating is proposed with provisions for armrests, backrests, moveable furniture and clear areas adjacent to seating for wheelchair users.
- Self-binding gravel paths and natural play elements through and within sensory planting on the podium garden provides informal play space and opportunities for all users to engage with nature. The play space within Vinyl square contains sound pipes, a rubber mound with climbing ropes and a tunnel, all of which helps to provide a variety of play opportunities for all users.

The Council's Access Officer confirmed the above information is sufficient but that they would still request the 10% wheel chair accessibility be spread across all tenures.

WASTE STRATEGY OFFICER

Acceptable for waste and recycling requirements. However, the site managers must ensure that all bins are accessible for collection as well as for residents. This may require bins to be pulled out from the bin store on collection days, because the store is not large enough to access all of the bins

Suitable dropped kerbs must be installed on new and existing pathways to allow for the bins to be pulled to the vehicle for collection. Please liaise with the Highways / Waste teams to ensure these are installed in a suitable location.

Case Officer's comments:

The Waste Strategy Officer's comments were forwarded to the applicant who has confirmed that the Site Management Team will be responsible for ensuring refuse bins are available for residents and collection at the appropriate times and that dropped kerbs will be required on Blyth Road and the Access Road to the west of the of the building to allow movement of waste containers. These will be secured by a Service and Delivery Plan condition.

CONTAMINATION OFFICER

The submitted reports provide factual accounts, details and subsequent reviews of site-wide Phase 1 and Phase 2 investigations which have been conducted at the Old Vinyl Factory (TOVF) over a period of years.

a) The submitted Phase 1 preliminary risk assessment identifies:

- all previous uses and potential contaminants associated with those uses
- conceptual models of the site indicating sources, pathways and receptors
- potentially unacceptable risks arising from contamination at the site

The Phase 1 report also identified requirements for site-wide Phase 2 investigative works to be conducted, to further assess land at the site, particularly in terms of the preliminary risk assessment and conceptual model which outlined:

- Various on site and off site potential sources of possible contamination (including land gas and vapours)
- Potential risks to human health and controlled waters

b) The submitted Phase 2 - Environmental Site Investigation report provides details of the adopted site-wide investigation scheme at the Old Vinyl Factory (TOVF), including: soil; soil gas; surface and groundwater sampling; together with the results of analysis, all providing the required information for the detailed assessment of the risks to all affected onsite and offsite receptors.

The site-wide investigation report also includes details of areas which the investigation scheme identified as land requiring remedial measures. The report indicates specific requirements for 300mm depth of clean topsoil to be placed above any land at the site that is to be allocated for areas of open landscaping.

c) The submitted verification reporting provides various site-specific details and data collected in order to demonstrate where remediation works are not required/completed and also identifying requirements for further arrangements and contingency action (e.g. areas where action to address ground gas concentrations are considered necessary, particularly in identified residential zones).

Based on observations and other data obtained from boreholes, the proposed areas of land referred to within this application for 1 Vinyl Square were not identified as having significant contamination, it is thereby considered, subject to confirmation during a required discovery strategy (to be implemented throughout preparatory ground works at the site), that the land would not require further works to address contamination.

However, it is recommended that the following conditions are imposed:

1. If, during development, contamination not previously identified is discovered at the site then no further construction of the development (unless otherwise agreed in writing with the local planning authority) shall be carried out until the developer has submitted a remediation strategy to the local

planning authority detailing how this unanticipated contamination is to be dealt with, and until written approval from the local planning authority is obtained. The remediation strategy shall be implemented as approved.

Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policies DMEI 11 and DMEI 12 Hillingdon Local Plan Part 2 (2020).

2. No contaminated soils or other materials shall be imported to the site. All imported soils for landscaping purposes shall be clean and free of contamination. Before any part of the development is occupied, all imported soils shall be independently tested for chemical contamination, and the results of this testing shall be submitted and approved in writing by the Local Planning Authority. All soils used for gardens and/or landscaping purposes shall be clean and free of contamination.

Reason

To ensure that risks from land contamination to the future users of the land and neighbouring land are minimised, together with those to controlled waters, property and ecological systems and the development can be carried out safely without unacceptable risks to workers, neighbours and other offsite receptors in accordance with policies DMEI 11 and DMEI 12 Hillingdon Local Plan Part 2 (2020).

Observations:

The reviewed reports demonstrate a suitable approach was adopted towards risk assessment for the management of contaminated land and the processes of evaluation were conducted in accordance with the requirements of model procedures as set out in CLR11.

The reported site wide investigation/s covers the area of the Old Vinyl Factory using shallow trial pits (up to 1.6 metres), with formation of window sampling boreholes and deep boreholes (up to 30 metres bgl). Some previous work was also undertaken across TOVF by RPS consultants.

The testing involved 10 soil samples and analysis of the groundwater. The soil testing results although limited for the area of the site showed only four elevated lead levels, one elevated arsenic level and a raised alkaline pH.

The report indicates remediation is required in the case of limited soft landscaping for the development/s. 300 mm of soil is proposed. The site has made ground and this is where contamination is likely, the natural ground (including gravels) was generally found to be 'clean' and no pollution hot spots are recorded. No visual olfactory or instrument detected evidence of significant contamination was noted.

Arrangements of underground services ducts/tunnels are rather complicated over the wider areas of TOVF site and considerable works were reported to have been conducted to investigate asbestos and hydrocarbon contamination within the ducts. It appears that very little work was conducted on ducts within certain sections of TOVF because it is not stated within the geo environmental investigations and remediation summary. Therefore, any asbestos and hydrocarbons identified in any service ducts that may be discovered in the part of TOVF site which applies to this application, may (if discovered) require to be further investigated and remediated in accordance with an approved discovery / remediation strategy.

Various tests and sampling were conducted during formation of boreholes at the site and, based on available data, the risk assessment indicated a potential risk associated with ground gas was

considered present in certain proposed residential zones of the site. Therefore, further gas monitoring is advisable at certain areas of TOVF. The evaluation is based on three rounds of gas monitoring at selected boreholes; It is considered possible the conclusions may also be based on results from the wider TOVF area. However, there was no evidence of ground gases identified within the boreholes local to the proposed footprint of 1 Vinyl Square.

Case Officer comments

Conditions relating to contaminated land and imported soils are recommended to be attached to any grant of planning consent.

AIR QUALITY OFFICER

Damage Cost

The proposed development is located within the Hays Focus Area, producing traffic emissions which will add to current high ambient annual mean values and exceedances of nitrogen dioxide in this sensitive area.

The proposal is also not air quality neutral (being air quality neutral is a Mayor's requirement) and originates NOx and PM2.5 emissions from associated transport for at an equivalent damage cost of £116,183.

A Travel Plan is to be finalised and delivered with targets of reducing traffic by at least 10% achieved, secured by a bond. In this context, a discount of 10% of the total damage cost can be applied (to be confirmed by transport colleagues regarding suitability of the travel plan proposed).

Therefore, a section 106 agreement with the LAP of £104,565 is to be paid to contribute to Hillingdon to deliver its air quality local action plan and or implement specific measures on/along the road network affected by the proposal that reduce vehicle emissions and or reduce human exposure to pollution levels.

Observations

The following two Air Quality conditions are required. See text below.

Condition Air Quality - Low Emission Strategy

No development shall commence until a low emission strategy (LES) has been submitted to and approved in writing by the Local Planning Authority. The LES shall be linked to and consistent with the Travel Plan and address

1) the fleet composition associated with the A1/A2/A3/A5/B1 Use Classes of the proposed development to be Euro 6/VI or cleaner (e.g. electric) or have implemented retrofitting devices that will enable compliance with such Euro standards.

2) the supply of energy to the proposed development. Any CHP or gas boiler will have to conform with the London Ultra Low NOx requirements;

The strategy shall detail the steps that will be followed in addressing the lower emissions requirements stated above and what measures will be taken to take into account future changing standards and available technologies and be updated accordingly in agreement with the local planning authority.

3) an electric vehicle fast charging bay. This is to be implemented as part of the proposal with a minimum of the number of charging points required in the London Plan.

4) a clear and effective strategy to encourage residents/ staff / users to

a) use public transport;

b) cycle / walk to work where practicable;

c) enter car share schemes;

d) purchase and drive to work zero emission vehicles.

The measures in the agreed scheme shall be maintained throughout the life of the development.

Reason - As the application site is within an Air Quality Management Area and Focus Area and to reduce the impact on air quality in accordance with policy EM8 of the Local Plan: Part 1 (November 2012), policy DME1 14 of the London Borough of Hillingdon Local Plan (part 2), London Borough of Hillingdon Air Quality Local Action Plan 2019-2024, London Plan Policy 7.14, and paragraph 170 of the National Planning Policy Framework (2018).

Air Quality - Construction

1. No development shall commence until proof of the registration in GLA's database (nrmm.london/nrmm/about/what-nrmm-register) and compliance with the London's Low Emission Zone for non-road mobile machinery requirements is submitted to and approved in writing by the Local Planning Authority.
2. The London's Low Emission Zone for non-road mobile machinery to comply with the standards set out at Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction and Demolition'.
3. This will apply to both variable and constant speed engines for both NO_x and PM. These standards will be based upon engine emissions standards set in EU Directive 97/68/EC and its subsequent amendments.

Reason: Compliance with the London's Low Emission Zone for non-road mobile machinery as per requirements as of 1st September 2015, and London Plan Supplementary Planning Guidance 'The Control of Dust and Emissions from Construction and Demolition' (2014).

Wider Context

Focus Areas are areas within LBH Air Quality Management Area where current level of action is not sufficient to reduce current levels of air pollution below the standards set by Government to protect human health. Focus Areas are defined as areas where the air quality limits are exceeded, there is relevant public exposure and actions should be prioritised to achieve significant improvements in air quality.

Current poor ambient air quality within Hays Focus Area at sensitive receptors means that current Local Authority air quality measures to improve air quality within this area need to be supported by the planning system and that additional efforts to improve air quality are required, as prescribed in the NPPF.

LBH requires new developments to incorporate air quality positive design measures from the outset and suitable mitigation measures to reduce pollution, especially in areas where the air quality is already poor (LBH Air Quality Local Action Plan 2019- 2024), namely Focus Areas.

In addition, the London Plan requires development to be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).

Case Officer comments

Conditions relating to the submission of a Low Emission Strategy and Air Quality during construction are recommended to be attached to any grant of planning consent.

DESIGN AND CONSERVATION OFFICER

The Old Vinyl Factory was formerly home to His Master's Voice (HMV) and later EMI. Building started on site in 1906 and a large cluster of factory buildings soon came to dominate the area. The significance of the area was recognised in the latter part of the 20th century when it was made a conservation area in 1988 (Botwell: Thorn EMI Conservation Area) and some of the factory buildings were either Statutory listed or added to the local list.

The masterplan for the mixed-use redevelopment of the Old Vinyl Factory (TOVF) was approved in

2013. The aim was to create a new residential-led mixed-use neighbourhood to bring life back to a largely vacant site and enhance the conservation area. The area remains an important part of Hillingdon's industrial heritage.

One Vinyl Square is the last residential-led phase of the master plan and an important development that will help to complete the area. The site is in a prominent location on Blyth Road and also fronts onto Vinyl Square and the new public space.

The conservation area is currently included on Historic England's Heritage at Risk Register and it is anticipated that once all the phases of development have been completed the conservation area will be removed from the register.

The application seeks permission to redevelop the site to provide a mixed-use development comprising 134 residential units (C3 Use Class) and ground floor commercial floorspace (flexible A1/A2/A3/A5/B1 Use Class), with associated car parking, cycle parking and landscaping.

The proposed development site forms part of the The Old Vinyl Factory masterplan. This was granted outline permission in April 2013 (59872/APP/2012/1838) for a comprehensive mixed-use development which was amended under Section 73 in July 2014 (59872/APP/2013/3775). It is understood that this permission has now lapsed as no application for the site had been submitted in time.

The outline parameters for 1 Vinyl Square comprised a building up to a height of 37.73 metres excluding plant, lifts and parapets. This would equate to a residential block no higher than 11-storeys. This would be taller than the surrounding development that has and is in the process of being built and would result in the development being one of the most prominent buildings within the conservation area and far taller than the Statutory and locally listed buildings close to the site. It is acknowledged that the previously approved height was up to height 37.73 metres which this current scheme adheres to. Since there has been no change in circumstance since the previous permissions were granted it may be hard to argue that the scheme is unacceptable in height although a reduced scheme would be more appropriate to the context.

Pre-applications were undertaken prior to the submission of this application. Although the approved parameters did permit a building up to a maximum height it negotiations were undertaken to help reduce the height of the north-western block so that there is a more gradual rise in height from the adjacent and much lower Veneer Store. This has helped to reduce the cliff like impact with the Veneer Store in views looking east along Blyth Road.

The separation distances between habitable rooms across the podium does not meet the 21 metres and is not policy compliant. In order to overcome overlooking bay windows have been introduced with south facing windows to maximise natural light into the affected apartments. This solution overcomes the overlooking concerns whilst retaining a separation distance between the east and west blocks of 19 metres.

The general layout of the blocks looks acceptable and single aspect flats have been kept to a minimum. Active frontages are provided at ground floor with access into flats and the commercial space and are appropriate. There is some inactive frontage to the southern elevation at street level around the bike store. This has been mitigated against with added architectural detailing in the form of decorative brickwork and metal mesh that provides visual interest to the street.

No objection is raised to facing brickwork being used as the primary construction material which is characteristic of the area. The detailed design of the facades has been sensitively handled with contrasting light buff brick and red brick that separate the blocks. The use of two window types will also help to visually break up the blocks along with the different types of balcony design and the use of spandrel panels.

There are some reservations over the signage (1 VINYL SQUARE) to the roof parapet on the eastern elevation. The proposed building would already be the tallest in the area and the introduction

of signage would draw more undue attention to the building. Ideally this should be removed from the proposals. If this is not possible then it should not be made more prominent with illumination.

Given the emerging character of the area and the well established masterplan the proposed development is not considered to cause harm the character and appearance of the conservation area.

The success of the scheme would be dependent on the building's detailed design and the introduction of high quality materials and good quality workmanship. It is, therefore, suggested that the following conditions be attached should the application be minded for approval:

Suggested conditions:

Submission of Details

Detailed drawings or samples of materials as appropriate, in respect of the following shall be submitted to and approved in writing by the local planning authority before the relevant part of the works is begun, and the works shall not be carried out other than in accordance with the details so approved and shall thereafter be so maintained:

- (a) Samples of materials
- (b) Details of roof parapets, window and door reveals, spandrel panels
- (c) Details of balconies, railings, metal cladding, metal mesh rainwater pipes
- (d) Details of signage and external lighting

Sample panels required

Sample panels of facing brickwork showing the proposed colour, texture, facebond and pointing shall be provided on site, and approved in writing by the local planning authority before the relevant parts of the approved works are commenced, and the sample panels shall be retained on site until the work is completed in accordance with the panel (s) so approved.

Windows and doors

Elevation drawings at a scale of 1:20 and plan and vertical sectional drawings at a scale of 1:2 of the proposed windows and doors shall be submitted to and approved in writing by the local planning authority. The works shall be undertaken in accordance with the approved details.

Case Officer comments

The above suggested conditions have been amalgamated into an appropriately worded materials condition that is recommended to be attached to any grant of planning consent.

HIGHWAYS

Planning permission is sought for the redevelopment of a brownfield site that previously formed part of the Old Vinyl Factory. The site is situated on the edge of Hayes town centre towards the western end of Blyth Road situated in between the Vinyl Square to the east and the Veneer Store to the west.

Blyth Road benefits from street lighting and is subject to a 30 mph speed limit. In the vicinity of the site Blyth Road has single yellow line 08:00 to 18:30 hours parking restrictions. As elsewhere in the Borough there is a midnight to 08:00 and 18:30 hours to midnight No Parking restriction for buses and coaches and vehicles greater than 5 tonnes gross weight. The easternmost one-way section of Blyth Road is located within the Hayes Parking Management Zone (HY1), which restricts use of parking spaces to permit holders only from 09:00 to 22:00 hours.

Transport for London use as system called PTAL (Public Transport Accessibility Level) to measure access the public transport network. PTAL assesses walk times to the nearest public transport location taking into account service frequency. The location is then scored between 0 and 6b where 0 is the worst and 6b the best. According to the TfL WebCAT service the application site has a PTAL ranking of 2 bordering 1b indicating access to public transport is limited.

The London Borough of Hillingdon Local Plan: Part 2 Development Management Policies (2020) Policy DMT6: Vehicle Parking requires that a development proposal must comply with the relevant parking standards. These standards set the maximum number of car parking spaces permitted. For one and two bed flats the maximum number of parking spaces permissible ranges from 1 to 1.5 car parking spaces, three and four bedroom flats require 2 car parking spaces depending on local circumstances and reliance on the private car for trip making. The new development would have a total of 67 car parking spaces; this represents a ratio of car parking spaces to number of dwellings of 0.5. Sixty two car parking spaces would be provided within the adjacent Veneer Store surface level car park and 5 disabled spaces provided immediately to the south of the proposed building (67 spaces in total). Variance is allowed from Policy DMT6: Vehicle Parking where it would 'not lead to a deleterious impact on-street parking provision, congestion or local amenity'. Taking into account that the application site occupies a site on the edge of Hayes town approximately 550m from Station Road, which provides a variety of amenities such as shops, business services, leisure facilities as well as public transport opportunities the quantum of residential car parking spaces proposed is considered appropriate.

However, no car parking will be provided to serve the commercial element of the development; the developer argues that the vast majority of trips for the flexible commercial space will be linked with other trips by local residents and employees in the surrounding area. The Highway Authority has objections to this as Policy DMT6: Vehicle Parking requires car parking spaces depending on final use. Taking into account the sites PTAL ranking and edge of town centre location car parking spaces are required to be allocated for use by staff and visitors.

Commitment is made to provide adequate space for cycle storage to align with the draft London Plan standards. Two hundred and forty four residential long-stay spaces are to be provided, as a mix of two-tier and Sheffield stands. Cycling is to be encouraged through the provision of a cycle hub, where cycle storage is complemented by maintenance and cleaning facilities and local cycle route information.

Electric Vehicle Charging Points (EVCP) will be provided in accordance with draft London Plan standards, i.e. 14 'active' spaces comprising 20% of total parking provision, with the remaining 80% to be provided. This exceeds the requirement of the adopted London Plan, which seeks 20% passive provision of EVCP.

Residential waste storage will be located at ground floor within two dedicated areas provided adjacent the northern frontage (17 containers) and western frontage (5 containers). The stores are located within 10 metres of the on-street collection locations, i.e. Blyth Road and the access road to the west of the building. The Site Management Team will attend the site on a weekly basis to rotate the containers, to ensure that residents have access to empty containers. Commercial waste storage will be allocated within the demise of the commercial floor area, with collection undertaken by private waste contractor as necessary. Swept path drawings have been provided for a 3.5T Panel Van, 7.5T Box Van and 11 metre removal van, these demonstrate that all vehicles can manoeuvre safely and conveniently along within internal access roads.

The developer report that trip generation for the proposed development has been calculated using the industry standard TRICS database which provides comparable survey information for land uses akin to the proposed development. Sites have been selected from TRICS have been checked to ensure that they are comparable in terms of location, accessibility and parking provision. The developers have then used the 2011 Census to establish the method of journey to work for residents in the area. This Census modal split data has then been applied to the trip generation

The findings indicate that indicates that the majority of trips would be undertaken by car, with 28 two-way car driver trips during the AM Peak and 21 two-way during the PM Peak. Public transport

accounts for 21 two-way trips during the AM Peak and 16 two-way trips during the PM Peak. It is not expected that this number of peak hour trips will have a material impact on the local highway or public transport network, given the application site is located in an area with good access to public transport and amenities, as well as being located a short distance from major trunk roads, including the M4.

The Highway Authority requires that a Construction and Logistics Plan, Service and Delivery Plan are submitted for approval; these documents should be produced based on the guidance produced by TfL tailored to the development and local circumstances. These should be secured by way of suitable planning condition and/or S106 contributions.

Construction Logistic Plans:-

<http://content.tfl.gov.uk/construction-logistics-plan-guidance.pdf>

Service and Delivery Plans:-

<http://content.tfl.gov.uk/delivery-and-servicing-plans.pdf>

Given the Car-Lite status of the applicant's proposals the applicant will have to enter a legal agreement to ensure the future residents do not have access to parking permits within the Hayes Parking Management Scheme

The Travel Plan submitted alongside the planning application proposes that mode share targets are set as soon as 75% of the dwellings are occupied. However the Highway Authority require that targets must be agreed from first day of occupancy as people are more likely to change their travel behaviour from the outset when they move in as opposed to months later by which time they may have become accustomed to using a driver only private car. There are no contingencies in place should the Travel Plan targets not be met, this matter needs to be addressed.

An effective measure that has been overlooked and worthy of further investigate is the displaying of public transport information in real time at the reception/foyer. It is understood that TfL can help in this respect.

The travel plan mentions in section 6.3 how the travel plan will be monitored. It should be monitored more frequently and not just annually in order to put new measures in place should it become apparent that the targets may not be achieved.

As submitted the Travel Plan provides a sound basis for encouraging and enabling travel by means other than the driver only private car. As surety that the Travel Plan will be implemented and targets achieved the Highway Authority requires that the developer provides a £20,000 bond. In the event of the Travel Plan not being delivered the Highway Authority will use this bond to implement the Travel Plan itself. This should be secured by way of a suitably worded condition.

Subject to the points mentioned being addressed; there are no highway objections to this application.

Case Officer's comments:

Following receipt of these comments the proposed development has been amended to provide 68 car parking spaces comprising 66 residential spaces and 2 spaces for the commercial element. There are 8 disabled spaces proposed (6% of total accessible homes, with the potential to increase to up to 10% subject to demand. The Council's Highways Engineer has confirmed no objection to the amended proposals and also confirmed that they agreed that the actual PTAL rating for the site is currently 3, rising to 4 once Crossrail services begin running.

FLOOD AND WATER MANAGEMENT OFFICER

Patrick Parsons have produced a Flood Risk and Drainage statement, this proposes to manage surface water from the site through green roof and tanks, however this provides additional storage to bring this drainage design up to current government design standards restricting flows to 1.2ls and providing storage for up to the 1 in 100 plus 40% CC allowance.

As further detail on the green roof and final drainage arrangement is yet to be provided and so an appropriate condition is required. Opportunities at the front of the building within the landscaping on Blyth Road should be maximised

Prior to commencement (excluding demolition and site clearance) a scheme for the provision of sustainable water management shall be submitted to, and approved in writing by the Local Planning Authority.

The scheme shall clearly demonstrate how it, manages water and demonstrate ways of controlling the surface water on site by providing information on:

a) Suds features:

i. incorporating sustainable urban drainage (SuDs) in accordance with the hierarchy set out in Policy 5.13 of the London Plan. Where the proposal does not utilise the most sustainable solution, justification must be provided,

ii. calculations showing storm period and intensity and volume of storage required to control surface water and size of features to control that volume to Greenfield run off rates at a variety of return periods including 1 in 1 year, 1 in 30, 1 in 100, and 1 in 100 plus Climate change. This rate should be presented per hectare as well as the total for the whole site.

iii. where it is intended to have above ground storage, overland flooding should be mapped, both designed and exceedance routes above the 100, plus climate change, including flow paths depths and velocities identified as well as any hazards, (safe access and egress must be demonstrated).

iv. Where infiltration techniques (soakaway) a site investigation must be provided to establish the level of groundwater on the site, and to demonstrate the suitability of infiltration techniques proposed on the site. (This should be undertaken at the appropriate time of year as groundwater levels fluctuate).

b) Minimise water use.

i. incorporate water saving measures and equipment.

ii. provide details of how rain and or grey water will be recycled and reused in the development.

c) Long Term Management and Maintenance of the drainage system.

i. Provide a management and maintenance plan

ii Include details of Inspection regimes, performance specification, (remediation and timescales for the resolving of issues where a PMC).

iii Where overland flooding is proposed, the plan should include the appropriate actions to define those areas and actions required to ensure the safety of the users of the site should that be required.

iv. Clear plans showing all of the drainage network above and below ground. The responsibility of different parties such as the landowner.

Thereafter the development shall be implemented and retained/maintained in accordance with these details for as long as the development remains in existence.

Reason

To ensure that surface water run off is controlled to ensure the development does not increase the risk of flooding contrary to:

Policy EM6 Flood Risk Management in Hillingdon Local Plan: Part 1- Strategic Policies (Nov 2012), Policy 5.12 Flood Risk Management of the London Plan (March 2016) and

To be handled as close to its source as possible in compliance with Policy 5.13 Sustainable Drainage of the London Plan (March 2016), and

Conserve water supplies in accordance with Policy 5.15 Water use and supplies of the London Plan

(March 2016).

National Planning Policy Framework (June 2019), and the Planning Practice Guidance (Flood Risk and Coastal Change March 2014).

Case Officer comments:

A condition relating to the submission of a Sustainable Urban Drainage Strategy is recommended to be attached to any grant of planning consent.

BUILDING CONTROL

1. It is our opinion that the open plan apartments do not comply with BS9991:2015.
2. This fire risk assessment appears to have been produced by a suitably qualified assessor who have attempted to address the standards of Paragraph B within the London Plan Policy D12 (Fire Safety).
3. These comments do not prejudice any formal comments made by the London Fire Emergency Planning Authority (LFEPA). A consultation to the LFEPA will be made as part of the Building Control application process.
4. The final Fire Risk Assessment will need to be checked by a suitably qualified Fire Safety Specialist in order to discharge the Policy D12 planning condition and any costs to be recovered
5. This fire risk assessment has been reviewed as submitted, however it is not considered the final fire risk assessment. Design for means of escape, active/passive fire measures and access for the fire services will be subject to change as the scheme progresses and therefore a final risk assessment will be required to be submitted along with the Building Control application for review.

Case Officer's comments:

The above comments were provided to the applicant who has provided the following response:

In response to comment 1, we note that the majority of the open plan apartments fall within or very close to the 8x4m requirement. The Fire Strategy sets out that the overall fire strategy has been considered, however the detailed design for each individual apartment and accordance with the building regulations will be addressed post planning permission, as part of the detailed design stage, in conjunction with Building Control.

Post planning permission, we would prepare an Open Plan Assessment or CFD modelling in order to justify that the very few open plan apartments that do not strictly comply are acceptable.

We trust that Building Control will agree this level of information isn't required at this stage in the planning process and can be addressed with Building Control as part of detailed design, pre-construction. Joseph Homes are, of course, committed to ensuring that all apartments will meet the necessary Building Regulations.

Case Officer's comments:

The Council's Building Control Officer has confirmed that the above details are acceptable. It is recommended that a condition be attached to any grant of planning consent requiring the implementation of a Fire Strategy to be approved by the a suitably qualified professional.

LANDSCAPE ARCHITECT

This site is occupied by one of the westernmost plots of land within the Vinyl Factory complex. It is situated on the Blyth Road frontage, adjacent to the Vinyl Square public open space. Previously used as a car park with extensive tree planting, all existing trees have been, or will be, removed.

The proposal has been the subject of a number of pre-application meetings and reference is made to the current D&AS which was amended in February 2020. The mixed use development will comprise 134 residential units, including flats and maisonettes. Areas to be landscaped include limited opportunities for ground level planting, albeit the setting of the building will benefit from the

Vinyl Square Open Space, when approached from the east. All roof spaces will be utilised to provide amenity space, with the exception of the north-east corner which will accommodate PV's.

A range of roof /podium level gardens will be created to cater for the needs of residents. These will include activity spaces /play areas, social zones and growing areas. Amenity space will also be created in the form of private balconies and roof terraces. The D&AS provides figures confirming that the scheme achieves the GLA's Urban Greening Factor target of 0.4.

No objection, subject to conditions.

Case Officer comments:

A condition relating to Landscaping details is recommended to be attached to any grant of planning consent.

INDEPENDENT REVIEW OF NOISE IMPACT ASSESSMENT

The following conclusions are made:

- The proposed development is identified as "Medium Risk" and this identification is confirmed;
- To ensure acceptable internal noise levels indicative glazing and acoustic ventilator specifications have been provided though the internal noise criteria is not explicitly defined. Acceptable internal noise levels will need to be defined and secured by planning condition;
- No assessment has been made of the potential for sleep disturbance from LAFMax events and until this is provided it is unknown if the internal noise conditions are reasonable;
- As the windows need to be closed to ensure internal noise conditions full details of the proposed ventilation and thermal comfort arrangements must be provided;
- The noise levels external amenity areas are over the guidance limits for private balconies though this is offset by the roof garden and podium spaces being below the guidance limits.

Our recommendations are summarised as follows:

- As the site is "Medium Risk" it can be considered that suitable mitigation could be secured by planning conditions. The recommendation is there are not grounds for refusal on matters of noise, though planning conditions will be required to ensure reasonable internal noise levels and an adequate ventilation and cooling strategy;
- The Applicant is to confirm the ventilation strategy, internal noise targets and the cooling\thermal comfort strategy and LBH is to secure an acceptable strategy through a planning condition;
- LBH are to secure the plant noise rating level limits through a planning condition.

INDEPENDENT REVIEW OF DAYLIGHT AND SUNLIGHT IMPACT (Summary)

Overall, the architects have worked to design a balanced scheme providing future occupants with good levels of daylight and sunlight whilst still having access to generous balconies. We therefore consider the daylight and sunlight performance of the proposed building to be very good.

With regards to the impact on the surrounding properties, it is just Empire Building that is affected by the proposals. Out of the 38 windows tested for daylight, 9 windows will have a VSC of 18%, which is below the target value of 27%. It will be for Hillingdon to decide if this value is appropriate in this situation.

Case Officer comments:

For Empire House, the results identified only isolated transgressions from the BRE targets, which are driven by the self-light limiting design features of Empire House, such as the recessed windows and deep single aspect units. Nonetheless, amenity levels remain very high for an urban environment.

INDEPENDENT REVIEW OF FINANCIAL VIABILITY APPRAISAL (Conclusions)

For the purpose of our assessment we assessed the benchmark land value on an existing use

value plus basis and also on an Alternative Use basis mirroring the previous consent and adjusting for full policy requirements including affordable housing. In respect of the latter approach no premium was reflected as dictated by guidance.

The second basis i.e. an AUV (adjusted for full policy requirements) approach was agreed as a reasonable basis for assessment given the site characteristics and the previous planning history of the site.

However, there were further discussions and exchanges of information in relation to two main areas namely the gross to net allowance of the commercial space and the appropriate build cost discount to apply to the lower density benchmark land value scheme from the agreed cost of the proposed scheme. Further justification was provided in respect of the gross to net allowance from the commercial accommodation and this was adjusted for both the benchmark and proposed scheme to ensure consistency. In respect of the build cost discount, agreement was reached at the mid-point of the Applicant and Carter Jonas positions.

Further viability modelling was undertaken by the Applicant's consultant, which was reviewed and verified as correct. This modelling determined the project surplus (or the additional sum which could be used to contribute towards additional affordable housing or lower value tenures of affordable housing) for the proposed scheme against the benchmark land value scheme.

The above analysis resulted in a revised offer being submitted by the Applicant to include an affordable housing provision of 138 habitable rooms (35% by habitable room) with an affordable housing tenure split of 67% intermediate and 33% affordable rent. This equates to 27 units for shared ownership, 6 family maisonettes for affordable rent and 3 family maisonettes for London Affordable Rent. A full schedule of accommodation has been provided and is appended to this letter

We can confirm that following the comprehensive review of the Applicant's FVA and various rebuttal documents that agreement has now been reached on the viability of the scheme. In this content we are comfortable that the Applicant's revised offer should be considered the maximum reasonable reflecting the characteristics and planning history of the site.

7. MAIN PLANNING ISSUES

7.01 The principle of the development

The application site forms part of TOVF masterplan which was granted outline planning permission on 19 April 2013 (59872/APP/2012/1838) for a:

"Mixed use development of the Old Vinyl Factory site including demolition of up to 12,643sqm of buildings and construction of up to 112,953sqm (112,953sqm includes the retention and reuse of 784sqm 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 GEA) up to 7,886sqm of new B1 floorspace, up to 4,000sqm of A class uses (A1,A2,A3,A4,A5), up to 4,700sqm of D1 and D2 uses, an energy centre (up to 950sqm), car parking, works to access and creation of new accesses and landscaping".

The principle of residential led development has therefore been established for the site albeit this consent has now expired.

Policy SA2: The Old Vinyl Factory and Gatefold Building, Hayes within The Local Plan: Part 2 - Site Allocations and Designations (2020) states:

"The Old Vinyl Factory

In accordance with the approved planning permission (Ref: 59872/APP/2012/1838) or any variations thereafter the Council will support the development of the following uses on the site:

- Demolition of up to 12,643 sqm of buildings and construction of up to 112,953 sqm;

- 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;..."

For Hillingdon, the London Plan sets a housing delivery target of a minimum of 5,593 new homes between 2015 and 2025 (559 per annum). Local Plan Core Strategy Policy H1 seeks to maximise the supply of additional housing in the Borough and states the Council will meet and exceed its minimum strategic dwelling requirement, where this can be achieved, in accordance with other Local Plan policies.

With regard to the proposed use, the development comprises a residential scheme (within Use Class C3) with ancillary commercial uses. The National Planning Policy Framework 2019 (NPPF) seeks to significantly boost the supply of housing and as such, the supply of housing is considered to be a public benefit. Paragraph 61 of the NPPF states 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 and where it is needed, that the needs of groups with specific housing requirements are addressed. London Plan Policy 3.3 (2016) recognises the need for more homes in London in order to promote opportunity and provide a real choice for all Londoners.

Policy at local, regional and national levels therefore acknowledges the need to provide new homes. It is considered that the nature and deliverability of the proposed development within a predominantly residential area would contribute positively and actively to meeting the overall housing requirement for Hillingdon over the Local Plan period.

The proposed commercial space (Use Classes A1, A2, A3, B1, D1 or D2) is deemed ancillary to the residential use of the site. Amenity issues relating to this proposed commercial use are discussed within the report. The proposed location of the commercial use offers optimum opportunity to deliver viable commercial premises for Hayes.

Accordingly the proposals accord with Local Plan Core Strategy Policy H1, Local Plan Part 2, Policy SA2, Policy 2.17 of the London Plan (2016) and the NPPF (2019).

7.02 Density of the proposed development

Policy DMHB 17 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that all new residential development should take account of the Residential Density Matrix contained in the supporting Table 5.3. and that all developments will be expected to meet habitable rooms standards.

The proposed scheme includes 134 dwellings across the 0.45 ha site area, which equates to 297 dwellings/ha.

The site currently has an official TfL PTAL rating of 1b/2, but following the introduction of Elizabeth line services in 2021/22 will achieve a PTAL rating of 4. The Council's Highways Engineer has confirmed their agreement to these ratings.

Utilising the current PTAL rating of 3, Policy DMHB 17 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) seeks for new developments to achieve the appropriate density which is compatible with the local context. Supporting Table 5.3 recommends that for a PTAL of 3/6 that a density of 150-190 dwellings/ha is appropriate. The proposed scheme has a density of 297 units per hectare which sits outside the upper density range recommended by Policy DMHB 17. However, the

application site only includes the proposed built form and an area of surface car parking as it sits as the final phase within a wider development area. Therefore the density calculation is higher than if it included adjacent land such as Vinyl Square, which is entirely public realm. It should also be noted that the built form sits within the parameters previously approved under the outline consent. Taking the above factors into consideration the proposed density is considered acceptable in this location.

Unit Mix

Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the Council will require the provision of a mix of housing units of different sizes in schemes of residential development to reflect the Council's latest information on housing need.

Policy H10 of the emerging London Plan (Intend to publish version) 2019, also outlines that the nature and location of the site needs to be taken into account, with a higher proportion of one and two bed units generally being more appropriate in locations with higher public transport access and connectivity.

The 2011 Census shows a mismatch between dwelling size and household size, with 60% of households living in dwellings containing five or more habitable rooms, but only 24% of households having four or more people. 60% of households contain only one or two persons. Projections envisage that the general trend towards smaller households will continue. The Council is of the view that a significant proportion of this need could be met through the provision of one and two bed units in town centres.

In ensuring a range of housing choice is provided to residents, London Plan Policy 3.8 states that new developments should offer a range of choices, in terms of the mix of housing sizes and types.

The development proposes the following mix of units:

Studio x 11 units (8.2%)
1 Bed x 41 units (30.6%)
2 Bed x 60 units (44.8%)
3 Bed x 22 units (16.4%)

Total = 134 Units

The Council's Policy Team have reviewed the submitted housing mix and raised no objections. Given the location of the site in close proximity to Hayes town centre the mix proposed, which includes a proportion of larger units at 16.4%, is deemed acceptable and appropriate and in accordance with Policy DMH 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) and policy H10 of the emerging London Plan (Intend to publish verison) 2019.

7.03 Impact on archaeology/CAs/LBs or Areas of Special Character

CONSERVATION AREA AND LISTED BUILDINGS

Policy HE1 of the Hillingdon Local Plan: Part One - Strategic Policies (November 2012) states that the Council will conserve and enhance Hillingdon's distinct and varied environment, its settings and the wider historic landscape (including locally and statutorily Listed Buildings, Conservation Areas, Areas of Special Local Character and Archaeological Priority Zones and Areas), and encourage the reuse, modification and regeneration of historic assets.

Policy DMHB 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states development that has an effect on heritage assets will only be supported where:

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

Development proposals affecting designated heritage assets need to take account of the effects of climate change and renewable energy without impacting negatively on the heritage asset. The Council will seek to secure the repair and reuse of Listed Buildings and monuments and improvements to Conservation Areas on the Heritage at Risk Register, through negotiations with owners, the provision of advice and guidance, the use of appropriate legal action, and through bids for external funding for improvement works.

Policy DMHB 2 states that applications for Listed Building Consent and planning permission to alter, extend, or change the use of a statutory Listed Building will only be permitted if they are considered to retain its significance and value and are appropriate in terms of the fabric, historic integrity, spatial quality and layout of the building. Any additions or alterations to a Listed Building should be sympathetic in terms of scale, proportion, detailed design, materials and workmanship.

Applications should include a Heritage Statement that demonstrates a clear understanding of the importance of the building and the impact of the proposals on the significance. The substantial harm to or total loss of significance of a statutory Listed Building will only be permitted in exceptional circumstances when the nature of the heritage asset prevents all reasonable use of the building, no viable use can be found through marketing, grant-funding or charitable or public ownership and the loss is outweighed by bringing the site back into use. In such circumstances, full archaeological recording of the building will be required. Planning permission will not be granted for proposals which are considered detrimental to the setting of a Listed Building.

Policy DMHB 4 requires that new development, including alterations and extensions to existing buildings, within a Conservation Area or on its fringes, will be expected to preserve or enhance the character or appearance of the area. It should sustain and enhance its significance and make a positive contribution to local character and distinctiveness.

The Old Vinyl Factory was formerly home to His Master's Voice (HMV) and later EMI. Building started on site in 1906 and a large cluster of factory buildings soon came to dominate the area. The significance of the area was recognised in the latter part of the 20th century when it was made a conservation area in 1988 (Botwell: Thorn EMI Conservation Area) and some of the factory buildings were either Statutory listed or added to the local

list. The application site is located to the west of the Botwell Thorn Conservation Area. To the East is Enterprise House, which is a Grade II listed industrial building for which planning permission and listed building consent was granted in October 2014 for the restoration, refurbishment and conversion of the building as part of a mixed use development. Enterprise House is an early concrete clad metal framed structure, which dates from the early 20th century. This building has a very distinct appearance and is considered as a local landmark, it was also part of the original EMI site when first constructed. In addition within The Old Vinyl Factory development site are Apollo House, Neptune House, The Record Store and The Shipping Building, which are all locally listed. To the East of the site beyond the adjacent developments is Hayes and Harlington Station, which is also locally listed.

The Council's Conservation and Design Officer has been involved throughout the pre-application discussions and has requested some amendments to the scheme. These have been incorporated into the final design and no objections have been made to the proposals. In addition the closest heritage assets are not directly adjacent to the site but separated by existing buildings.

The Conservation and Design Officer's comments raised one query related to the '1 Vinyl Square' lettering, stating 'The proposed building would already be the tallest in the area and the introduction of signage would draw more undue attention to the building. Ideally this should be removed from the proposals. If this is not possible then it should not be made more prominent with illumination'. It should be noted that this application does not grant advertisement consent for the signage and therefore this element of the proposals will be considered under a separate advertisement consent application.

In addition Historic England have been consulted on the application and have raised no objections. As such the impact of the proposals on the nearby Enterprise House, locally listed buildings and the Conservation Area are considered acceptable and the proposed development is deemed to accord with Policies HE1 of the Local Plan Part 1 (2012), policies DMHB 1, DMHB 2 and DMHB 4 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

ARCHAEOLOGY

Policy DMHB 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that the Council, as advised by the Greater London Archaeological Advisory Service, will ensure that sites of archaeological interest within or, where appropriate, outside, designated areas are not disturbed. If that cannot be avoided, satisfactory measures must be taken to mitigate the impacts of the proposals through archaeological fieldwork to investigate and record remains in advance of development works. This should include proposals for the recording, archiving and reporting of any archaeological finds.

NPPF paragraph 189 states applicants should provide an archaeological assessment if their development could affect a heritage asset of archaeological interest. In addition paragraph 199 of the NPPF says that applicants should record the significance of any heritage assets that the development harms. Applicants should also improve knowledge of assets and make this public.

The Greater London Archaeological Advisory Service were consulted on the proposals and noted that The Old Vinyl Factory has been subject to two phases of archaeological evaluation in 2013-14 with negative results. As such they have concluded that the

development is unlikely to have a significant effect on heritage assets of archaeological interest.

The proposed development is therefore deemed to accord with Policy DMHB 7 of the Local Plan: Part 2 - Development Management Policies (2020) and the London Plan (2016).

7.04 Airport safeguarding

Policy DMAV1 of the London Borough of Hillingdon Local Plan part 2 - Development Management Policies (January 2020) and paragraphs 95 and 182 of the National Planning Policy Framework (2019).

The proposed scheme accords with the parameters (including maximum height) as approved under the Old Vinyl Factory outline planning consent. National Air Traffic Services (NATS) have been consulted on the proposals and have raised no objections to the application. Heathrow Airport and the Ministry of Defence (RAF Northolt) have also been consulted and they have requested conditions be attached to any grant of planning consent. These conditions relate to maximum building heights, the requirement for a Bird Hazard Management Plan and a Crane Management Strategy due to concerns regarding the use of cranes.

These conditions are recommended to be attached to any grant of consent and as such the proposals are deemed to have an acceptable impact on airport safeguarding in accordance with Policy DMAV1 of the London Borough of Hillingdon Local Plan part 2 - Development Management Policies (January 2020) and paragraphs 95 and 182 of the National Planning Policy Framework (2019).

7.05 Impact on the green belt

The site is not located within or close to the Green Belt, as such there are no Green Belt issues relating to this application.

7.07 Impact on the character & appearance of the area

Part 1 Policy BE1 of the Local Plan requires all new development to improve and maintain the quality of the built environment in order to create successful and sustainable neighbourhoods.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states that:

All development, including extensions, alterations and new buildings will be required to be designed to the highest standards and, incorporate principles of good design including:

- i) harmonising with the local context by taking into account the surrounding:
 - scale of development, considering the height, mass and bulk of adjacent structures;
 - building plot sizes and widths, plot coverage and established street patterns;
 - building lines and setbacks, rooflines, streetscape rhythm, for example, gaps between structures and other streetscape elements, such as degree of enclosure;
 - architectural composition and quality of detailing;
 - local topography, views both from and to the site; and
 - impact on neighbouring open spaces and their environment.
- ii) ensuring the use of high quality building materials and finishes;
- iii) ensuring that the internal design and layout of development maximises sustainability and is adaptable to different activities;
- iv) protecting features of positive value within and adjacent to the site, including the safeguarding of heritage assets, designated and undesignated, and their settings; and
- v) landscaping and tree planting to protect and enhance amenity, biodiversity and green infrastructure.

Policy 7.1 of the London Plan (March 2016) sets out a series of overarching design principles for development in London and Policy 7.6 seeks to promote world-class, high quality design and design-led change in key locations. In addition to Chapter 7, London Plan policies relating to optimizing the housing potential/density of sites (Policy 3.4) and sustainable design and construction (Policy 5.3) are also relevant.

There are a number of multi-storey buildings within the locality, including the 8 storey Enterprise House, the 8 storey Shipping Building and 7 storey Cabinet Building. Reserved Matters consent has also been approved for the adjacent 8 storey Assembly Buildings. These are all large buildings of a significant scale and massing in the immediate vicinity, which are similar to the scale of building proposed. There is also a constant theme of industrial architecture and the extensive use of brick, which again is consistent with the development proposed.

The Council's Conservation and Design Officer has reviewed the proposals and provided comments in support of the application. One Vinyl Square is the last residential-led phase of the site wide master plan and an important development that will help to complete the area. The outline parameters for this phase comprised a building up to a height of 37.73 metres excluding plant, lifts and parapets. This would equate to a residential block no higher than 11-storeys. The scale of development proposed is within the parameters previously approved as part of the masterplan for The Old Vinyl Factory. Although the approved parameters did permit a building up to a maximum height negotiations were undertaken to reduce the height of the north-western block so that there is a more gradual rise in height from the adjacent and much lower Veneer Store. This has helped to reduce the impact in views looking east along Blyth Road. Active frontages are provided at ground floor with access into flats and the commercial space and are appropriate. There is some inactive frontage to the southern elevation at street level around the bike store. This has been mitigated against with added architectural detailing in the form of decorative brickwork and metal mesh that provides visual interest to the street.

No objection is raised to facing brickwork being used as the primary construction material which is characteristic of the area. The detailed design of the facades has been sensitively handled with contrasting light buff brick and red brick that separate the blocks. The use of two window types will also help to visually break up the blocks along with the different types of balcony design and the use of spandrel panels. Given the emerging character of the area and the well established masterplan the proposed development is not considered to cause harm the character and appearance of the locality. Subject to conditions the Council's Conservation and Design Officer raises no objection to the proposals.

As such it is considered the proposed development accords with Part 1 Policy BE1 of the Local Plan and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

7.08 Impact on neighbours

Policy DMHB 11 of the Local Plan: Part 2 - Development Management Policies (2020) requires that development proposals should not adversely impact on the amenity, daylight and sunlight of adjacent properties and open space.

The proposals would be located some 40m from the closest residential properties which are located to the north within the Empire Building, a former office building that has been converted to residential use under permitted development. Jupiter House, also on Blyth Road and located to the north east is approximately 70m from the proposals. There is a terrace of residential properties located 78m to the south west on Dawley Road. The

proposals are also approximately 140m from the future Assembly Buildings development within the Old Vinyl Factory Site.

The proposed building would be separated from properties within Empire House by Blyth Road and properties on Dawley Road by the existing Music Box multi-storey car park and the consented Veneer Store building. It is considered that the separation distances proposed would be sufficient to avoid over dominance to these adjoining properties, in addition the proposal consists of a residential led development within the parameters and scale as approved under the site wide consent. The consented Veneer Store is a proposed multi-storey car park and as such there are no concerns raised with regards to impact on this building.

Privacy

The Hillingdon Local Plan: Part 2 - Development Management Policies (2020) includes details on maintaining privacy and states that adequate distance should be maintained to any area from which overlooking may occur. Regard should be given to the character of the area and the distances between buildings but as a guide, the distance should not be less than 21m between facing habitable rooms and windows. Given the separation distances noted above it is considered that no loss of adjacent residential privacy would occur as a result of the proposals.

Daylight and Sunlight

The National Planning Policy Framework paragraph 123, part C stipulates that "local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site."

Planning Practice Guidance (2019) Paragraph 6 of the section 'Effective use of land' states that "Where a planning application is submitted, local planning authorities will need to consider whether the proposed development would have an unreasonable impact on the daylight and sunlight levels enjoyed by neighbouring occupiers, as well as assessing whether daylight and sunlight within the development itself will provide satisfactory living conditions for future occupants..."

Policy 7.6 of the London Plan requires that buildings do not cause unacceptable harm in relation to overshadowing as there could be the potential for a poorly designed building to have considerable impacts upon the neighbouring residents.

Policy 7.7, Location and Design of tall and large buildings, notes that large buildings should not adversely affect their surroundings in terms of overshadowing: "Location and design of tall buildings should not affect their surroundings adversely in terms of micro-climate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference."

The Supplementary Planning Guidance on Housing (March 2016) states "An appropriate degree of flexibility needs to be applied when using the BRE guidelines to assess the daylight and sunlight impacts of new developments on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, larger sites and accessible locations, where BRE advice suggests considering the use of alternative

targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time."

The application is supported by a daylight and sunlight report that considers the potential daylight/sunlight effects of the proposed development, this report has been independently reviewed by third party. A summary of the feedback received follows and confirms that the quality of the daylight and sunlight within the neighbouring properties has been assessed using processes recommended within the BRE document 'Site Layout Planning for Daylight and Sunlight' (2011). The BRE guidelines are not mandatory and the document should not be seen as an instrument of planning policy. Although it gives numerical guidelines, these should be interpreted flexibly because natural lighting is only one of many factors in site layout design.

The results demonstrate that the the scheme responds to its context in order to limit the effect on the amenity of neighbouring properties in terms of either daylight or direct sunlight. Due to the orientation of the buildings the residential accommodation most likely to be impacted by the new development would be those to the north and north east of the site, namely the Empire Building and Jupiter House on Blyth Road.

Taking these buildings in turn, for Empire House, the results identified only isolated transgressions from the BRE targets, which are driven by the self-light limiting design features of Empire House, such as the recessed windows and deep single aspect units. Nonetheless, amenity levels remain very high for an urban environment. For Jupiter house the technical analysis has shown that this property remains fully BRE compliant for the Daylight and Sunlight assessments with the proposed development in place.

For the reasons set out above it is considered that there would be no material loss of daylight or sunlight to neighbouring occupiers to such an extent as to warrant a refusal of the current application.

Commercial Use

There are no concerns raised regarding the impact of the proposed commercial unit on adjacent occupiers subject to conditions regarding hours of use, noise and extraction flues. These conditions are recommended to be attached to any grant of planning consent. The proposed commercial premises would be separated by a minimum of 40m from the closest existing residential properties.

As such it is considered that the proposal does not result in an un-neighbourly form of development and complies with the requirements of Policy DMHB 11 of the Local Plan: Part 2 - Development Management Policies (2020).

7.09 Living conditions for future occupiers

Internal Space Standards

Policy DMHB 16: 'Housing Standards' requires 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.

All of the dwellings proposed comply with the internal space standards as set out in Table 3.3 'Minimum Space Standards for New Dwellings' of the London Plan 2016 and the Technical housing standards - nationally described space standard (2015).

Amenity Space

Policy DMHB 18: 'Private Outdoor Amenity Space' of the Local Plan: Part 2 - Development Management Policies (2020) states that all new residential development and conversions will be required to provide good quality and useable private outdoor amenity space. Amenity space should be provided in accordance with the Council standards set out in Table 5.2. Balconies should have a depth of not less than 1.5 metres and a width of not less than 2 metres. Any ground floor and/or basement floor unit that is non-street facing should have a defensible space of not less than 3 metres in depth in front of any window to a bedroom or habitable room. However, for new developments in Conservation Areas, Areas of Special Local Character or for developments, which include Listed Buildings, the provision of private open space will be required to enhance the streetscene and the character of the buildings on the site. 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.

The proposed podium roof gardens within the development serve as communal amenity space with defensible private space adjacent to properties to serve residents within the development. There are also a significant number of balconies proposed that contribute towards external amenity space.

The development proposed is required to deliver the following external amenity space:

11 x studio units and 41 x 1 bedroom flats = 1040m²

60 x 2 bedroom flats = 1500m²

22 x 3 bedroom flats = 660m²

In total therefore 3200m² of external amenity space is required.

The proposal would not provide sufficient private outdoor amenity to fully comply with Policy DMHB 18. A total of 2995.7m² of amenity space proposed. 1053.4m² is proposed as communal amenity space within podium gardens on level 01, 09 and roof levels. 1942.3m² is proposed as private amenity space on balconies. There is therefore a shortfall of 204.3m². These areas do not include the front gardens at ground level that face onto Blyth Road as they are not deemed to provide sufficient levels of amenity.

The Council are looking at improvements at Lake Farm Gardens, which is the closest public open space to the site. A planning contribution to fund the delivery of enhancements to the local park could be secured up to £40,000, which is considered to mitigate the impact of the shortfall in amenity space provision.

Child's Play

Policy DMHB 19 'Play Space' of the Local Plan: Part 2 - Development Management Policies (2020) states that new major residential developments which result in a significant net increase in child yield an occupancy of ten or more children will be required to provide children and young people's play facilities on-site. Where a satisfactory level of provision for children and young people's play facilities cannot be achieved on-site, the Council will seek a financial contribution towards the improvement of existing children and young people's play facilities within the local area.

Policy DMCI 5 'Children's Play Areas' of the Local Plan: Part 2 - Development Management Policies (2020) states that for all major development proposals, the Council will apply Hillingdon's child yields and the London Plan SPG; 'Providing for Children and Young Peoples Play and Informal Recreation', which specifies that 10sqm of play space should

be provided for each child and an accessibility standard of 400 metres to equipped playgrounds. In areas of deficiency, there will be a requirement for new provision to be made to meet the benchmark standards for accessibility to play provision.

London Plan Policy 3.6 and London Plan Intend to Publish Version Policy S4 require development proposals to make provisions for play and informal recreation based on the expected child population generated by a development. This is supported by the Mayor's supplementary planning guidance (SPG) 'Shaping Neighbourhoods: Play and Informal Recreation', which sets a benchmark of 10 sqm of useable child play space to be provided per child, with under-fives play space provided on-site as a minimum, and makes clear that play space should not be segregated by tenure.

The submitted Design and Access Statement has proposed a level of playspace however the calculations provided are based on incorrect inputs. The GLA have confirmed that the proposed scheme has been calculated to generate a child yield of 50.9 in total, which includes a 24.1 yield for under-fives. This equates to a requirement to provide 509.3m² of playspace, including at least 241m² for under-fives on-site.

The proposed scheme as submitted included 352m² of playspace, including 153m² for under-fives. Following consultation with the GLA it has been demonstrated that the level of under 5 play space can be increased by 88m² with additional provision on the tenth floor. The design of this space can be captured through details submitted to discharge the relevant landscaping condition. The scheme has developed an overarching play strategy which proposes a significant provision of dedicated play space for under 5's and 6-11 age groups as well as significant opportunities for natural play within the various amenity spaces. However, to ensure that sufficient play space is secured for the lifetime of the development within the application site and across the wider Old Vinyl Factory site it is recommended that a Play Space Strategy be secured through the s106 Legal Agreement should the application be approved.

Overshadowing of Amenity Space

The site layout, orientation of the proposed buildings and the separation distances proposed are intended to minimise overshadowing across the site. It is considered that due to the orientation of the proposed buildings the amenity space will benefit from minimal overshadowing.

Public Open Space

Policy DMCI 4 'Open Spaces in New Development' of the Local Plan: Part 2 - Development Management Policies (2020) states that proposals for major new residential development will be supported where they make provision for new open space, or enhancements to existing open space, which meets the needs of the occupiers of the development and contributes to the mitigation of identified deficiencies in the quantity, quality and accessibility of open space. Regard will be had to Hillingdon's local recommended standards of provision for all relevant typologies of open space. In major town centre developments, new civic space may be required as an alternative to green open space. The policy goes on to state that proposals for major new residential development that fail to make provision for new or enhanced open space, or which would result in open space that is inappropriate in type, quality or location, will be resisted.

The proposed development fails to provide any meaningful public open space and therefore a contribution is required to provide new open space or enhance existing public open space. The Council's Town Centre Improvements Team are currently working on

improvements to the public realm surrounding Hayes and Harlington Station. The original outline consent for the wider site included a Public Realm/Town Centre Improvements contribution of £187,428.07 for the 510 units approved (or £367.50 per unit). If we deduct the 5 units left within the approved outline parameters from the proposals then for the remaining 129 units proposed a contribution of £47,408.26 is considered appropriate in order that the development contribute to public open space as required by Policy DMCI 4 'Open Spaces in New Development' of the Local Plan: Part 2 - Development Management Policies (2020) and the Planning Obligations SPG (2014).

Daylight/sunlight

The National Planning Policy Framework paragraph 123, part C stipulates that "local planning authorities should refuse applications which they consider fail to make efficient use of land, taking into account the policies in this Framework. In this context, when considering applications for housing, authorities should take a flexible approach in applying policies or guidance relating to daylight and sunlight, where they would otherwise inhibit making efficient use of a site."

Planning Practice Guidance (2019) Paragraph 6 of the section 'Effective use of land' states that "Where a planning application is submitted, local planning authorities will need to consider whether the proposed development would have an unreasonable impact on the daylight and sunlight levels enjoyed by neighbouring occupiers, as well as assessing whether daylight and sunlight within the development itself will provide satisfactory living conditions for future occupants..."

Paragraph 7 states that "All developments should maintain acceptable living standards. What this means in practice, in relation to assessing appropriate levels of sunlight and daylight, will depend to some extent on the context for the development as well as its detailed design. For example, in areas of high density historic buildings, or city centre locations where tall modern buildings predominate, lower daylight and daylight and sunlight levels at some windows may be unavoidable if new developments are to be in keeping with the general form of their surroundings."

The Supplementary Planning Guidance on Housing (March 2016) states "An appropriate degree of flexibility needs to be applied when using the BRE guidelines to assess the daylight and sunlight impacts of new developments on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, larger sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time."

The application is supported by a daylight and sunlight report that considers the potential daylight/sunlight effects of the proposed development, which has been independently reviewed by external consultants.

The report advises that scheme has been designed in order to allow for maximum daylight and sunlight ingress into living areas, where it is generally more appreciated than in bedrooms. This has been achieved by locating most living areas in the corners of the buildings, where they benefit from a dual-aspect. Where living areas are single aspect the kitchen has been positioned at the back of the room and the living/dining space at the front where the daylight availability is greater.

Daylight is however only one of many factors to be considered when designing buildings and it must be balanced with other relevant requirements such as the provision of private amenity spaces and risk of overheating. The provision of private amenity in the form of large balconies inevitably obstructs daylight ingress into the habitable rooms. This can be considered an acceptable trade-off of amenity, especially as this helps to passively mitigate any overheating risks whilst providing outdoor amenity spaces.

Overall, the report concludes that the results of the technical assessments have shown very good levels of daylight and sunlight in the scheme with 82% (295 out of the total 360) of all proposed habitable rooms meeting or exceeding the recommended levels of Average Daylight Factor (ADF) and 86% with a very good sky visibility. The majority of living spaces (60%) also see good levels of Annual Probable Sunlight Hours and 86% of them experience excellent sunlight levels in the winter period. As explained above, where lower levels of light than recommended are seen this is a result of balancing daylight, the provision of private amenity, overheating and privacy issues.

A further five living/kitchen/dining and two studio rooms achieve the recommended ADF for living areas. As this level of daylight is considered acceptable for living spaces, it would be concluded that 303 out of the 360 (84%) of all habitable rooms assessed will offer future occupants good levels of daylight.

With regard to the tested rooms seeing lower levels of daylight, five are open plan living/kitchen/dining areas, 28 are living rooms and 24 are bedrooms. Of the five living/kitchen/dining areas that see low levels of daylight, four are marginally below the recommended ADF and have excellent levels of sky visibility. Only one sees low levels of daylight and sky visibility. This is located on the first floor facing the courtyard and therefore lower levels of daylight are naturally expected.

28 of the total 70 main living spaces assessed fall short of the BRE recommendation for ADF. However, the main reason for this shortfall, is the provision of balconies which obstructs most of the available daylight.

It is worth noting that all but four of the main habitable rooms see good levels of winter sunlight availability (WPSH) which means that the vast majority of occupants will be able to enjoy good levels of winter sunlight. The remaining four living rooms seeing lower levels of daylight and winter sunlight are located on the first floor, face the courtyard and are provided with balconies. Therefore, reduced levels of daylight are expected.

All 24 bedrooms falling short of the guidance are located behind balconies. Most of these rooms are located in the courtyard corners which is the most constrained area of the facade for daylight. Overall, the daylight and sunlight report concludes that the architects have worked to design a balanced scheme providing future occupants with good levels of daylight and sunlight whilst still having access to generous balconies. They therefore consider the daylight and sunlight performance of the proposed building to be very good.

The submitted Daylight and Sunlight Assessment has been reviewed by an independent consultant who concludes that overall, the architects have worked to design a balanced scheme providing future occupants with good levels of daylight and sunlight whilst still having access to generous balconies. They therefore consider the daylight and sunlight performance of the proposed building to be very good.

Given that the Supplementary Planning Guidance on Housing in March 2016, published by

the Mayor of London states that 'guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, larger sites and accessible locations, where BRE advice suggests considering the use of alternative targets', it is considered that the results demonstrate that the proposed accommodation will enjoy an appropriate level of sunlight.

Overshadowing

All areas of communal amenity within the scheme have been assessed for overshadowing. BRE guidance recommends that, in order for an area to appear well sunlit, at least half of it ought to see at least two hours of sunlight on 21st March. A total of five areas have been assessed as part of the Daylight and Sunlight report, three of which are roof terraces, one at podium level and the last one at ground floor (Vinyl Square). The report concludes that all tested areas far exceed the BRE recommendation and will therefore be well sunlit throughout the year, with most of their areas seeing more than six hours of sunlight from March to September in compliance with the BRE recommendations.

Noise

The application is supported by a Noise Impact Assessment. In order to determine the extent to which the site is currently affected by noise, a detailed measurement study has been carried out. Measurements have been carried out in order to characterise the existing noise climate during both the daytime and the night-time. Modelling shows that the majority of the site falls into Noise SDP 'Category B' during both the day and night-time periods, with only the front 5m of the site adjacent to Blyth Road falling into Noise SDP 'Category C'. On this basis "Noise should be taken into account when determining planning applications and, where appropriate, conditions imposed to ensure an adequate level of protection against noise to meet the Council's recommended outdoor and indoor noise levels."

The Noise Impact Assessment has been independently reviewed. It is agreed that the proposed development is identified as "Medium Risk". As such the independent reviewer states it can be considered that suitable mitigation could be secured by planning conditions and they recommend that there are not grounds for refusal on matters of noise, though planning conditions will be required. The noise levels external amenity areas are over the guidance limits for private balconies though this is offset by the roof garden and podium spaces being below the guidance limits. To ensure reasonable internal noise levels an adequate ventilation and cooling strategy and internal noise levels are to be secured by planning condition.

Privacy

As detailed within section 7.08 of this report the separation distances between the existing properties and the proposed development are considered to be acceptable. This results in the west, north and east facades of the building all achieving separation distances well in excess of 21m to protect residential privacy and amenity where windows could directly face each other.

Between the two 'wings' of the development the separation distance across the internal courtyard would be a minimum of 18.9m. Whilst this would mostly affect dual aspect rooms, there would be some single aspect rooms also affected. The distance proposed is below the level of separation distance required to protect residential amenity. As such the architects have staggered the location of the windows so that they are not directly opposite and have introduced a feature oriel window bay for the windows facing into the courtyard. This window directs views towards the south and away from neighbouring

windows or balconies. . This design feature is considered to therefore provide an acceptable and appropriate design solution.

Within the internal corners of the scheme where blocks meet at right angles the windows have been located to reduce overlooking and allow only acute angled views. This is deemed preferable to the use of large numbers of privacy screens which could have a detrimental impact on the outlook of properties. It is considered that the separation distances proposed and the location and angle of windows will create a development that provides acceptable levels of privacy for future occupiers. The proposal is therefore considered to be consistent with Policy DMHB 11 of the Hillingdon Local Plan: Part Two Development Management Policies (January 2020).

Outlook

The vast majority of the proposed units will be dual aspect (78%) with the number of single aspect dwellings reduced through the design process in discussions with officers. As a result of negotiations through the pre-application process there are zero single aspect north facing units. No three bed family units are proposed as single aspect. Given the use of standard access lift cores/corridors in developments of this nature, the mix of single and dual aspect units is deemed acceptable. All of the proposed units will have outlook over the internal podium area and/or the existing streetscene and will benefit from acceptable levels of outlook.

The Veneer Store building would be the closest structure to the site should both developments come forward. The Veneer Store would be a five-storey building containing 526 parking spaces. At ground floor level would be three small commercial units, one of 186.8sqm, one of 89.1sqm, and one of 78.1sqm. Also at ground floor level would be the car park office and plant room. The Veneer Store building would be located 15m away from the footprint of the proposed 1 Vinyl Square building. On the eastern facade of the ground floor within the Veneer Building would be two commercial units, the exit to the car park and the car park office. The car park office would have no windows in this location and therefore the only elements which require consideration are the commercial unit windows in this elevation. A large proportion of the proposal's ground floor elevation is given over to the pedestrian access and the bin store, however 4 of the maisonette residential units are located with rooms on this elevation. For the property in the north west corner of the site the ground floor living area would be 15m away from the commercial windows. However the room is not single aspect and has a window in the northern elevation as well as the western elevation. Two of the three units with access points on the western elevation would have bedrooms on the ground floor that are single aspect. However these units are not located directly opposite the commercial units and also have an additional two metre area of defensible space which further separates them from the Veneer Building should it be constructed. The final maisonette unit with access and a ground floor bedroom in the south west corner of the proposed building would have the 2m gap of defensible space and also be dual aspect with a further window in the southern elevation. Overall, the impact on these 3 bedrooms (out of a proposed total of 238 bedrooms) is such that it is not considered to result in a detrimental impact on residential amenity such as to warrant a recommendation for refusal. This is due to the fact that the rooms affected are either dual aspect or benefit from non-direct overlooking and have defensible space. The arrangement with buildings on either side of a public access road is also not that dissimilar to a normal streetscape.

The proposals are therefore deemed to be in accordance with Policy DMHB 11 of the Hillingdon Local Plan: Part Two Development Management Policies (January 2020).

7.10 Traffic impact, Car/cycle parking, pedestrian safety

The National Planning Policy Framework (NPPF) states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Policy 6.3 of the London Plan requires development proposals to ensure that the impacts on transport capacity and the transport network are fully assessed.

Policy DMT 1 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

A) Development proposals will be required to meet the transport needs of the development and address its transport impacts in a sustainable manner. In order for developments to be acceptable they are required to:

- i) be accessible by public transport, walking and cycling either from the catchment area that it is likely to draw its employees, customers or visitors from and/or the services and facilities necessary to support the development;
- ii) maximise safe, convenient and inclusive accessibility to, and from within developments for pedestrians, cyclists and public transport users;
- iii) provide equal access for all people, including inclusive access for disabled people;
- iv) adequately address delivery, servicing and drop-off requirements; and
- v) have no significant adverse transport or associated air quality and noise impacts on the local and wider environment, particularly on the strategic road network.

B) Development proposals will be required to undertake a satisfactory Transport Assessment and Travel Plan if they meet or exceed the appropriate thresholds. All major developments that fall below these thresholds will be required to produce a satisfactory Transport Statement and Local Level Travel Plan. All these plans should demonstrate how any potential impacts will be mitigated and how such measures will be implemented.

Policy DMT 5 of the Local Plan: Part 2 - Development Management Policies (2020) 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 and that cycle parking and changing facilities are provided. Cycle parking must be provided in accordance with Council Standards of one space per studio, 1 or 2 bed unit and two spaces 2 per 3 or more bed unit.

Policy DMT 6 of the Local Plan: Part 2 - Development Management Policies (2020) requires that proposals comply with the Council's parking standards in order to facilitate sustainable development and address issues relating to congestion and amenity. Parking for electric vehicles should be provided at a current minimum of 5% of car parking spaces with 5%

passive provision to meet the Mayor's targets. For residential development, car parking areas must include 10% of spaces suitable for a wheelchair user.

The site is currently served by the existing internal access roads of the wider development site.

Car Parking - Residential

Policy DMT6 states that for one and two bed flats the maximum number of parking spaces permissible ranges from 1 to 1.5 car parking spaces, three and four bedroom flats require 2 car parking spaces depending on local circumstances and reliance on the private car for trip making. The new development would have a total of 68 car parking spaces, with 66 for residential use; this represents a ratio of car parking spaces to number of dwellings of 0.5. Variance is allowed from Policy DMT6: Vehicle Parking where it would 'not lead to a deleterious impact on-street parking provision, congestion or local amenity'. Taking into

account that the application site occupies a site on the edge of Hayes town approximately 550m from Station Road, which provides a variety of amenities such as shops, business services, leisure facilities as well as public transport opportunities the quantum of residential car parking spaces proposed is considered appropriate subject to contributions to encourage sustainable forms of transport.

Funding is required for investment in measures that better connect the development site with Hayes Town Centre and Hayes and Harlington Station. With attractive and convenient measures for pedestrians and cyclists in place the Council can be confident that these will offer a genuine travel alternative to the private car. This opportunity to better connect the development with Hayes town centre has been taken into account when assessing the quantum of car parking spaces proposed on the site.

The Council's Highways Engineer has requested a contribution of £149,500 towards Public Realm Connectivity. This would be used towards the following:-

- £82,000 towards the upgrade of pedestrian and cycle facilities on Blyth Road (one third cost of total works)
- £47,000 towards works needed to create a shared use footway/cycleway along the southernmost point of Bollingbroke Way to the entrance into Stockley Park
- Santander Bike Contribution of £2,500; and
- £18,000 contribution for works to create a new shared pedestrian/cycle access from the eastern side of the Dawley Road near the Woolpack public house to the Grand Union Canal Quietway.

It is therefore considered that subject to an appropriate contribution, on balance, the level of parking proposed is sufficient for the residential component of the proposals. The applicant has confirmed their acceptance of the proposed level of contributions and these would be secured via a section 106 legal agreement.

In addition to the above Transport for London have reviewed the proposals and note that they represent an uplift of 21% compared to the originally assessed levels of residential development for the wider site. The methodology of assessing the additional units is supported by TfL who have confirmed that a revised Transport Assessment is not required and nor are any public transport contributions needed in order to mitigate against the impact of the development. TfL maintain their view that the parking ratio proposed is too high, however as explained above it is considered to be acceptable in terms of the London Borough of Hillingdon's local policies.

Blue Badge Parking

There are 8 disabled spaces proposed (6% of total accessible homes, with the potential to increase to up to 10% subject to demand). The Council's Highways Officer has confirmed that this level, plus flexibility to increase, is acceptable.

Car Parking - Commercial

Two car parking will be provided to serve the commercial element of the development following discussions with officers. The Highway Authority has considered this level of parking and confirmed that they have no objections to this level.

Electrical Vehicle Charging Points

Electric Vehicle Charging Points (EVCP) will be provided in accordance with draft London Plan standards, i.e. 14 'active' spaces comprising 20% of total parking provision, with the remaining 80% to be provided. This exceeds the requirement of the adopted London Plan,

which seeks 20% passive provision of EVCP.

Cycle Parking

In terms of cycle parking, the proposed development will provide a total of 238 cycle spaces including 16 Sheffield stands; six of the Sheffield stands can also accommodate larger bikes such as tricycles or recumbent bikes. Cycling is to be encouraged through the provision of a cycle hub, where cycle storage is complemented by maintenance and cleaning facilities and local cycle route information.

Motorcycle Parking

Motorcycle parking spaces have been proposed to the south of the main building, which equates to one space per 34 car parking spaces. This level fails to be in accordance with Council requirements and as such an additional 2 spaces are recommended to be secured by an appropriately worded condition should the application be approved.

Trip Generation

The developer reports that trip generation for the proposed development has been calculated using the industry standard TRICS database which provides comparable survey information for land uses akin to the proposed development. Sites have been selected from TRICS have been checked to ensure that they are comparable in terms of location, accessibility and parking provision. The developers have then used the 2011 Census to establish the method of journey to work for residents in the area. This Census modal split data has then been applied to the trip generation

The findings indicate that the majority of trips would be undertaken by car, with 28 two-way car driver trips during the AM Peak and 21 two-way during the PM Peak. Public transport accounts for 21 two-way trips during the AM Peak and 16 two-way trips during the PM Peak. It is not expected that this number of peak hour trips will have a material impact on the local highway network, given the application site is located in an area with good access to public transport and amenities, as well as being located a short distance from major trunk roads, including the M4.

Travel Plan

A draft Travel Plan has been submitted with the application that provides a sound basis for encouraging and enabling travel by means other than the private car. As surety that an updated Travel Plan will be implemented and targets achieved the Highway Authority requires that the developer provides a £20,000 bond. In the event of the Travel Plan not being delivered the Highway Authority will use this bond to implement the Travel Plan itself

Given the parking ratio proposed it is recommended that the legal agreement ensures that future residents do not have access to parking permits within the Hayes Parking Management Scheme.

Site Wide Car Parking

It is also recommended that an updated Car Park Management Plan for the wider Old Vinyl Factory Site be secured through the legal agreement should the application be approved. This is required to ensure that the allocation of parking spaces accords with the site wide approved parking provisions for each phase and use across the site. The original planning permission and reserved matters approvals for the site have allocated parking to the various consented phases of the parent permission. However as this application is a 'drop in' application to the wider site, it is important to ensure that this stand alone application accords with the original parking allocation.

In addition to the above the Council's Highways Engineer has requested conditions be attached to any consent that require a Construction Logistics Plan and a Service and Delivery Plan be submitted and approved in writing by the Council.

Subject to the above the proposals are deemed to be in accordance with Policies DMT 1, DMT 5 and DMT 6 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020), the National Planning Policy Framework (NPPF) and Policy 6.3 of the London Plan (2016).

7.11 Urban design, access and security

Policy DMHB 15 of the Local Plan: Part 2 - Development Management Policies (2020) requires all new development to ensure safe and attractive public and private spaces.

It is considered that there are no urban design or security issues arising from the proposal. The Metropolitan Police have been consulted on the proposals and raised no objections to the details submitted subject to the development being covered by a Secured by Design condition.

The proposals are therefore deemed to be in accordance with Policy DMHB 15 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

7.12 Disabled access

Policy DMHB 16: 'Housing Standards' requires 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, and in the case of major developments, provide at least 10% of new housing to be accessible or easily adaptable for wheelchair users

Policy 7.2 of the London Plan (March 2016) requires that the all new development provides the highest standards of accessible and inclusive design.

The Council's Access Officer has commented that it is unclear whether the M4(3) units would be interspersed throughout the development, and across typologies and tenures. 10% of affordable housing units would be required to satisfy the design standards for an M4(3) Wheelchair Accessible units. However the scheme is proposing 10% M4(3) homes, as required by policy and it is not always possible to also ensure that these units are split across the tenures, as well as maximising the delivery of affordable family homes.

The development proposes nine family maisonettes which are all proposed as affordable rent tenure. This is considered to be a positive element of the development and is welcomed by the Council's Housing Team. These nine family-sized affordable homes are maisonettes and have front doors with direct access onto the street, as well as private gardens.

The affordable maisonettes comply with the space requirements of the Nationally Described Space Standards and meet Part M4(2) requirements. However, in order to make one or more of these maisonettes compliant with Part M4(3), it would have to significantly increase in size due to the M4(3) requirements such as increased internal lobby size, corridor width, space within kitchen and kitchen worktop lengths, bedroom and bathroom/cloakroom sizes, plus the provision of wheelchair storage and transfer space. A critical extra requirement over the flats would also be the provision of a through-floor lift. The footprint of the site and other uses at ground floor mean that increasing a maisonette, in line with the above requirements, would necessitate the loss of a maisonette, meaning

that the development would only deliver eight affordable rented family-sized ground floor maisonettes.

On balance is considered preferable to retain all these units as affordable, as opposed to relocating an affordable rented unit to M4(3) compliant apartments within other floors of the development. It is acknowledged that this means that there will be no M4(3) compliant affordable rented homes within the development (albeit there will be in the intermediate affordable tenure), however it is considered that ensuring affordable family homes as maisonettes with their own individual front doors/amenity space is preferred. Further, there is no policy requirement to provide M4(3) homes split across each tenure, albeit the applicant has demonstrated that they have tried to ensure a split as far as possible.

Whilst the scheme does not provide all of the elements requested by the Council's Access Officer, the developer has demonstrated why that is not possible, but a conditions will be imposed to secure the minimum requirement of 10% M4(3) units within the development.

The scheme is in accordance with Policy DMHB 16: 'Housing Standards' and Policy 7.2 of the London Plan (March 2016).

7.13 Provision of affordable & special needs housing

The London Plan (March 2016) sets the policy framework for affordable housing delivery in London. Policy 3.12 requires boroughs to seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes, having regard to their affordable housing targets. Policy 3.13 sets the threshold for seeking affordable housing as schemes with 10 or more units.

The development would introduce a total of 134 dwellings, thereby triggering the Mayor's affordable housing requirement threshold. Policy H2 of the Hillingdon Local Plan: Part 1 - Strategic Policies relates to Affordable Housing with the Council seeking 35% of all new units in the borough delivered as affordable housing. The Council's Planning Obligations Supplementary Planning Document (supplementary planning guidance) states that the Council aims to achieve a tenure mix of 70% social rent and 30% intermediate housing across the Borough, however it notes at paragraph 4.16 that subject to the provision of robust evidence, it will adopt a degree of flexibility in its application of Policy H2 to take account of tenure needs in different parts of the borough as well as the viability of schemes.

The proposed development is for 134 residential units which would be split across the following mix:

Studio x 11 units (8.2%)
1 Bed x 41 units (30.6%)
2 Bed x 60 units (44.8%)
3 Bed x 22 units (16.4%)
Total = 134 Units

Of these units the following are proposed as affordable housing:

1 bed x 10 units
2 bed x 6 units
3 bed x 20 units
Total = 36 affordable housing units

In relation to habitable rooms this equates to 138 of the total habitable rooms (394), which is 35%. The affordable tenure split by habitable room is 67% intermediate and 33%

affordable rent. One third (3 maisonette units) of the affordable rent is proposed as London Affordable rent, which equates to 11% by habitable room.

It is noted that this tenure does not fully accord with planning policy. As such the applicants have lodged a Financial Viability Appraisal which has been independently reviewed and following lengthy discussion it has been confirmed that the affordable housing offer is the maximum reasonable offer considered viable for the proposals.

The Council's Housing Team have been involved with the discussions and confirm that the offer that all of the proposed maisonettes be offered as affordable is a positive element of the proposals.

The affordable housing offer, although not entirely policy compliant, is confirmed through the FVA appraisal process as the best offer viable and is a significantly greater offer than any other phase of the Vinyl factory, especially in relation to the 20 x 3 bedroom units proposed.

Taking the above matters into account, the affordable housing offer is considered to be justified and in accordance with Policy H2 of the Hillingdon Local Plan: Part 1- Strategic Policies. The details of the provision of affordable housing will be secured under the S106 Legal Agreement that will include an appropriate review mechanism.

7.14 Trees, landscaping and Ecology

Policy 5.10 of the London Plan (March 2016) states that development proposals should integrate green infrastructure to contribute to urban greening, including the public realm.

Policy G5 Urban Greening of the Intend to Publish London Plan (2019) states that Major development proposals should contribute to the greening of London by including urban greening as a fundamental element of site and building design, and by incorporating measures such as high-quality landscaping (including trees), green roofs, green walls and nature-based sustainable drainage.

Boroughs should identify the appropriate amount of urban greening required in new developments. The Urban Greening Factor should be based on the factors set out in the supporting table, but tailored to local circumstances. In the interim, the Mayor recommends a target score of 0.4 for developments that are predominately residential, and a target score of 0.3 for predominately commercial development.

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) also requires that new development is high quality, sustainable, adaptable, and harmonises with the local context. Landscaping and tree planting should also enhance amenity, biodiversity and green infrastructure.

Policy DMHB 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

A) All developments will be expected to retain or enhance existing landscaping, trees, biodiversity or other natural features of merit.

B) Development proposals will be required to provide a landscape scheme that includes hard and soft landscaping appropriate to the character of the area, which supports and enhances biodiversity and amenity particularly in areas deficient in green infrastructure.

The site is currently cleared and contains no trees or any landscaping features of merit. This site is also not covered by any TPO's. The proposed landscaping for the development

can be broken down into the following areas:

1. The ground floor public realm around the curtilage of the 1 Vinyl Square Building has been designed to tie in with the Old Vinyl Factory Masterplan. This has been considered through the selection of materials and planting. The design is composed of adoptable paving to tie in with Blyth Road materials and includes planted boundaries to provide privacy for residential units. Tree planting located to avoid below ground services, however the volume and impact of low level planting along Blyth Road has been maximised due to inability to plant trees in all locations as a result of below ground services. Specimen trees with 2m clear stem are proposed to allow cars to have visibility and climbing plant species are located along building edge to help animate building facades.

2. The first floor terrace has been designed to primarily provide an active and social space. Areas for informal play and large seating groups are integrated amongst planting. The design includes an activity sun deck in a south facing location. The deck is also the location for group seating, potted plants and potential community events. Boundary planting is proposed to provide privacy to adjacent residential units whilst secluded small seating areas are connected by raised deck sections. High impact sensory grass planting is included to create noise and movement. There is an informal sensory play route proposed with natural play elements surrounded by sensory planting and Multi stem trees to provide year round interest.

3. The ninth floor terrace aims to primarily provide social seating space amongst planting. The design provides one area that is smaller and creates a more secluded seating space. A second area is larger and surrounded by dense mounded planting, creating a protected environment suitable for seating. The design is composed of small non combustible composite timber terrace with reclined seating. Low level planting with seasonal interest and large variety of drought tolerant species are included.

4. The two tenth floor terraces are intended to create both a communal growing space for residents and a social seating space amongst planting that utilises wide views. The communal growing space is provided through both a herb garden and raised allotment beds. The social seating space amongst planting provides one area that is raised to get the best views and is exposed to wind. A second area is surrounded by dense mounded planting, creating a protected environment suitable for seating. The two roof terraces are linked both internally and externally.

The Design and Access Statement illustrates the areas of planting and surface materials which are being proposed. Based on these areas and the overall area of the site they have calculated that the scheme has an Urban Greening score of 0.4. This meets the target advised by the Mayor of London.

The Council's Landscape Architect has reviewed the submitted details and the proposed Urban Greening Factor and they have raised no objections to the proposals subject to additional information being required with regards to proposed surface materials and management and maintenance of landscaping. These details are recommended to be secured by condition and therefore subject to conditions the scheme is deemed to be in accordance with Policies DMHB 11 and DMHB 14 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) and the London Plan (2016).

ECOLOGY

Policy DMEI 7 of the Hillingdon Local Plan: Part 2 - Development Management Policies

(January 2020) relates to biodiversity protection and enhancement in major development proposals.

An Ecological Appraisal has been submitted to accompany the application. This sets out that the ecological value of the existing site is negligible, and includes recommendations to incorporate soft landscaping into the development, along with the installation of bird boxes, both of which form part of the proposals. The submission includes details of landscaping features, the details of which will be secured by condition and on this basis, the development will achieve a net gain in biodiversity and ecological enhancements at the site. As such it is considered that the proposals will improve the ecological footprint of the site in the context of its urban setting.

7.15 Sustainable waste management

Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) states that development proposals should make sufficient provision for well designed internal and external storage space for general, recycling and organic waste, with suitable access for collection. External bins should be located and screened to avoid nuisance and adverse visual impacts to occupiers and neighbours.

London Plan Policy 5.17 also requires adequate provision to be made for refuse and recycling facilities for new development.

Residential waste storage will be located at ground floor within two dedicated areas provided adjacent the northern frontage (17 containers) and western frontage (5 containers). The stores are located within 10 metres of the on-street collection locations, i.e. Blyth Road and the access road to the west of the building. It is proposed that the Site Management Team will rotate the containers, to ensure that residents have access to empty containers. Commercial waste storage will be allocated within the demise of the commercial floor area, with collection undertaken by private waste contractor as necessary. Swept path drawings have been provided for a 3.5T Panel Van, 7.5T Box Van and 11 metre removal van, these demonstrate that all vehicles can manoeuvre safely and conveniently along within internal access roads.

The Council's Waste Strategy Officer has confirmed that the proposed details are acceptable for waste and recycling requirements. However to ensure that the correct management measures are put in place it is recommended that a Delivery and Servicing Plan be required via an appropriately worded condition should the application be approved

As such the proposal is considered to be in accordance with London Plan Policy 5.17 and Policy DMHB 11 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

7.16 Renewable energy / Sustainability

Policy 5.3 of the London Plan requires development proposals to demonstrate sustainable design standards are integral to the proposal. It requires major development proposals to meet minimum sustainable design standards set out in the Mayor's SPG.

Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will ensure that climate change mitigation is addressed at every stage of the development process. This includes the reduction of carbon emissions through low carbon strategies and encouraging the installation of renewable energy to meet the targets set by the London Plan (March 2016).

Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies

(January 2020) requires that all developments make the fullest contribution to minimising carbon dioxide emissions in accordance with London Plan targets.

The submitted details have been reviewed and it is considered that insufficient information has been provided at this stage to determine whether the development proposed would achieve the appropriate standards. As such it is recommended that a condition be attached to any grant of planning consent which requires a full and complete Energy Strategy to be submitted and approved in writing by the Council. If the Energy Strategy indicates that a carbon off-set is required then this would be secured through a s106 legal agreement.

Subject to the above condition and potential s106 contribution the development is deemed to accord with Policy 5.3 of the London Plan, Policy EM1 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy DMEI 2 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

7.17 Flooding or Drainage Issues

Policy 5.12 of the London Plan (March 2016) requires that development proposals must comply with the flood risk assessment and management requirements set out in the NPPF and the associated technical Guidance on flood risk over the lifetime of the development.

Policy 5.13 of the London Plan (March 2016) states that development should utilise sustainable urban drainage systems (SUDS) unless there are practical reasons for not doing so, and should aim to achieve greenfield run-off rates and ensure that surface water run-off is managed as close to its source as possible.

Policy EM6 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that applicants must demonstrate that Flood Risk can be suitably mitigated.

Policy DMEI 9 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states 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.

The Council's Flood and Water Management Officer reviewed the submitted details and confirmed that they have no objections to the proposals subject to the attachment of an appropriate condition should the application be approved.

Therefore the proposed scheme is deemed to accord with Policies 5.12 and 5.13 of the London Plan (March 2016), Policy EM6 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy DMEI 9 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

7.18 Noise or Air Quality Issues

NOISE

The National Planning Policy Framework (NPPF) provides the Government's guidance on noise issues and paragraph 182 states that planning decisions should ensure that new development can be integrated effectively with existing businesses and that existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business could have a significant adverse effect on new development (including changes of use to residential) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed. Policy 7.15 of the London Plan seeks to reduce noise and minimise the existing and potential adverse impacts of noise on, from, within, or in the vicinity of, development proposals.

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will seek to safeguard and improve all land, water, air and noise quality. All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. Policy 7.14 of the London Plan (March 2016) further supports this.

The application is supported by a Noise Impact Assessment which confirms that at this stage there is no specific detail on the noise emission of fixed plant for the development and as such has specified a rating level limit of 10 dB below the background sound level at all noise sensitive receptors of 45/36 dB LAr,T during the daytime/night-time respectively.

The Noise Impact Assessment has been independently reviewed and the above approach is agreed, and a planning condition will be needed to secure the fixed plant noise limit in the event of planning permission being granted. This condition is recommended to be attached to any grant of planning consent. In addition a condition is recommended to be attached that limits the hours of use of the proposed commercial units. Subject to these conditions being attached it is considered that the scheme would be acceptable in terms of noise.

AIR QUALITY

Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) states that the Council will seek to safeguard and improve all land, water, air and noise quality. All development should not cause deterioration in the local air quality levels and should ensure the protection of both existing and new sensitive receptors. Policy 7.14 of the London Plan (March 2016) further supports this.

Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020) states:

A) 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.

B) Development proposals should, as a minimum:

i) be at least "air quality neutral";

ii) include sufficient mitigation to ensure there is no unacceptable risk from air pollution to sensitive receptors, both existing and new; and

iii) actively contribute towards the improvement of air quality, especially within the Air Quality Management Area.

The application site is within an air quality management area. The Council's Air Quality Officer has reviewed the proposals and the air quality assessment. They have calculated this a air quality contribution of £104,565 is required to mitigate against the impact of the development, which has been agreed by the applicant. This would be secured through the section 106 legal agreement should the application be approved.

In addition, as requested by the Council's Air Quality Officer, conditions relating to the submission of a Low Emission Strategy and Air Quality during construction are recommended to be attached to any grant of planning consent.

As such there are no concerns raised in terms of air quality and the application is considered to accord with Policy EM8 of the Hillingdon Local Plan: Part 1 - Strategic Policies (November 2012) and Policy DMEI 14 of the Hillingdon Local Plan: Part 2 - Development Management Policies (January 2020).

7.19 Comments on Public Consultations

None received

7.20 Planning obligations

Policy DMCI 7 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) relates to securing planning obligations to supplement the provision recreation open space, facilities to support arts, cultural and entertainment activities, and other community, social and education facilities through planning obligations in conjunction with other development proposals. This policy is supported by more specific supplementary planning guidance.

Should the application be approved, a range of planning obligations would be sought to mitigate the impact of the development, in line with Policy DMCI 7 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

The obligations sought are as follows:

1. On-site Affordable Housing (including review mechanism): (1 bed x 10 units, 2 bed x 6 units, 3 bed x 20 units. Tenure split 67% intermediate and 33% affordable rent. One third (3 maisonette units) of the affordable rent is proposed as London Affordable rent, which equates to 11% by habitable room).
2. Carbon off-set contribution
3. Air Quality contribution £104,565
4. Parking permits restriction for future occupiers
5. Santander Bike Scheme Contribution £2,500
6. Residential Travel Plan plus £20,000 bond
7. On site car club of 2 spaces, free membership for 3 years plus £50 credit for one person in each unit
8. External Amenity Space contribution £40,000
9. Grand Union Canal Quiet Way contribution of £18,000
10. Public Realm Connectivity £129,000
11. Public Open Space contribution £47,408.26
12. Play Space Strategy
13. On site blue badge car parking utilisation review to ensure a policy compliant provision should the demand for blue badge car parking exceed the on-site provision
14. Updated site wide Car Park Management Plan for the wider Old Vinyl Factory Site (wider site as approved under application reference 59872/APP/2013/3775)
15. Employment Strategy and Construction Training - either a contribution equal to the formula within the Council Planning Obligations Supplementary Planning Document (SPD) 2014, or an in-kind training scheme equal to the financial contribution delivered during the construction period of the development. Details shall be in accordance with the Council Planning Obligations SPD with the preference being for an in-kind scheme to be delivered.
16. Project Management & Monitoring Contribution equal to 5% of the total cash contributions. Details shall be in accordance with the Council Planning Obligations Supplementary Planning Document 2014.

In addition to S106 contributions the Council has adopted its own Community Infrastructure Levy (CIL) with a charge of £95 per square metre of gross internal residential floor area. This application is CIL liable with respect to new floorspace being created, and the sum calculated for this application based on the floor area proposed is £1,562,535.15 for the residential element and £19,483.33 for the commercial element, in total £1,582,018.48.

In addition to the London Borough of Hillingdon CIL, the Mayor of London's Community Infrastructure Levy (CIL) has introduced a charging system within Hillingdon of £60 per

square metre (as of the 1st of April 2019) of gross internal floor area to be paid to the GLA to go towards the funding of Crossrail. This application is CIL liable with respect to new floorspace being created, and the sum calculated for this application based on the floor area proposed is £760,385.66.

7.21 Expediency of enforcement action

None

7.22 Other Issues

Contamination

Policy DMEI 12 and Policy DMEI 13 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020) seek to control the risk from contamination.

The Council's Contaminated Land Officer has reviewed the submitted documents in terms of the risk of contamination and has raised no objections to the proposal subject to the attachment of appropriate conditions. The proposal is therefore acceptable in terms of contamination and in accordance with Policies DMEI 12 and DMEI 13 of the Hillingdon Local Plan: Part 2 Development Management Policies (January 2020).

Fire Safety

Policy D12 (Fire safety) of the draft London Plan - Intend to Publish (2019) says that in the interests of fire safety and to ensure the safety of all building users, development proposals must achieve the highest standards of fire safety. In this regard an Outline Fire Strategy has been submitted as part of the application. It is considered that a condition should be added to any permission to secure the implementation of a Fire Strategy for all parts of the development in accordance with draft Policy D12 (Fire safety) of the London Plan - Intend to Publish (2019).

8. Observations of the Borough Solicitor

General

Members must determine planning applications having due regard to the provisions of the development plan so far as material to the application, any local finance considerations so far as material to the application, and to any other material considerations (including regional and national policy and guidance). Members must also determine applications in accordance with all relevant primary and secondary legislation.

Material considerations are those which are relevant to regulating the development and use of land in the public interest. The considerations must fairly and reasonably relate to the application concerned.

Members should also ensure that their involvement in the determination of planning applications adheres to the Members Code of Conduct as adopted by Full Council and also the guidance contained in Probity in Planning, 2009.

Planning Conditions

Members may decide to grant planning consent subject to conditions. Planning consent should not be refused where planning conditions can overcome a reason for refusal. Planning conditions should only be imposed where Members are satisfied that imposing the conditions are necessary, relevant to planning, relevant to the development to be permitted, enforceable, precise and reasonable in all other respects. Where conditions are imposed, the Council is required to provide full reasons for imposing those conditions.

Planning Obligations

Members must be satisfied that any planning obligations to be secured by way of an agreement or undertaking pursuant to Section 106 of the Town and Country Planning Act 1990 are necessary to make the development acceptable in planning terms. The obligations must be directly related to the development and fairly and reasonably related to the scale and kind to the development (Regulation 122 of Community Infrastructure Levy 2010).

Equalities and Human Rights

Section 149 of the Equalities Act 2010, requires the Council, in considering planning applications to have due regard to the need to eliminate discrimination, advance equality of opportunities and foster good relations between people who have different protected characteristics. The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

The requirement to have due regard to the above goals means that members should consider whether persons with particular protected characteristics would be affected by a proposal when compared to persons who do not share that protected characteristic. Where equalities issues arise, members should weigh up the equalities impact of the proposals against the other material considerations relating to the planning application. Equalities impacts are not necessarily decisive, but the objective of advancing equalities must be taken into account in weighing up the merits of an application. The weight to be given to any equalities issues is a matter for the decision maker to determine in all of the circumstances.

Members should also consider whether a planning decision would affect human rights, in particular the right to a fair hearing, the right to respect for private and family life, the protection of property and the prohibition of discrimination. Any decision must be proportionate and achieve a fair balance between private interests and the public interest.

9. Observations of the Director of Finance

Not applicable

10. CONCLUSION

The application proposes the mixed use redevelopment of a site within the Old Vinyl Factory development on Blyth Road in Hayes. The proposal is for a single building of staggered storey heights that would provide 134 new residential units (Use Class C3) with 395m² of flexible commercial space to accommodate A1/A2/A3/A5/B1 uses, plus associated vehicle and cycle parking, communal amenity space, child play space and associated landscaping and plant.

Although this is a stand alone full planning application the site was part of the original outline masterplan for redevelopment of the VINYL factory. The outline masterplan is a material planning consideration which affects consideration of subsequent proposals on the site.

The application site for the current application is referred to in the outline planning permission as the Veneer Building, which formed phase 7 of TOVF masterplan. The approved outline parameters for the Veneer Building comprised a building of up to 11-storeys in height (maximum AOD of +66.90, excluding lift overruns and parapets etc). The Veneer Building was proposed to be the tallest building within TOVF masterplan, as a focal point and landmark to this entry point into TOVF, and Vinyl Square. As such design and massing considerations for this full planning application have been heavily influenced by the

outline consent.

Although the full application proposes more residential units than the outline application it delivers a considerable uplift in affordable housing, which clearly weighs in favour of a positive recommendation.

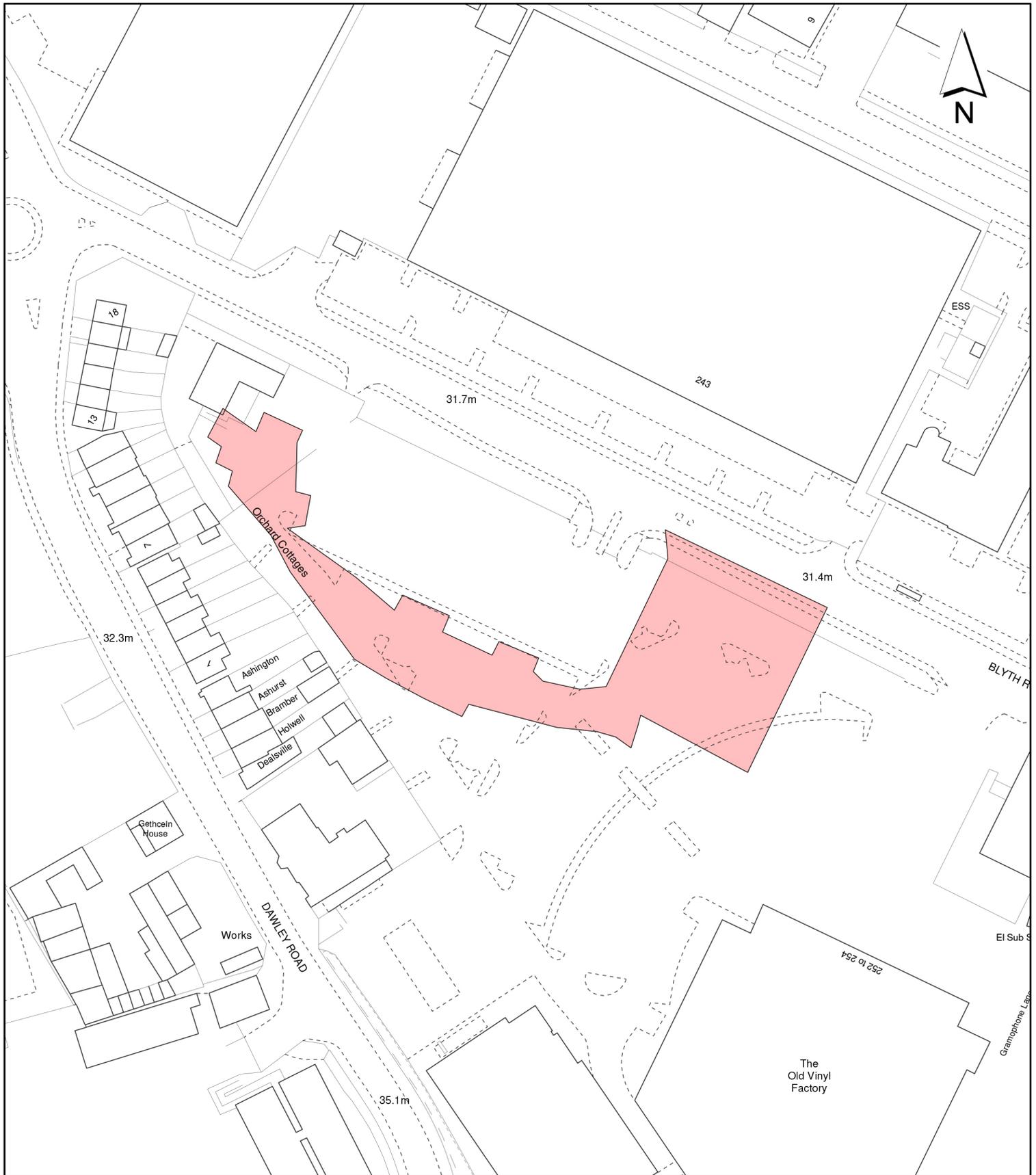
The proposed development is considered an appropriate mix of uses, scale and built form that is well designed and will enhance the locality. The provision of additional residential units to the local area is supported by local policy and the London Plan (2016). The application is therefore recommended for approval subject to conditions and a legal agreement to secure appropriate contributions.

11. Reference Documents

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)
Council's Supplementary Planning Document - Planning Obligations
Accessible Hillingdon SPD - September 2017
The London Plan (2016)
Draft London Plan - Intend to publish (2019)
GLA SPG Affordable Housing & Viability (August 2017)
GLA SPG Housing (March 2016)
GLA SPG Play and Informal Recreation (September 2012)
GLA SPG Planning for Equality and Diversity in London (October 2007)
The National Planning Policy Framework (NPPF) (2019)

Contact Officer: Ed Laughton

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Notes:

 Site boundary

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Site Address: **1 Vinyl Square
 The Old Vinyl Factory
 Blyth Road**

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 Telephone No.: Uxbridge 01895 250111

Planning Application Ref:
59872/APP/2019/3852

Scale:
1:1,250

Planning Committee:
Major

Date:
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