



Historic England

Mr Gregory Gray

Direct Dial: 0207 973 3777

London Borough of Ealing

Perceval House

Our ref: P01255190

London

W5 2HL

5 October 2020

Dear Mr Gray

**T&CP (Development Management Procedure) (England) Order 2015
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**PERCEVAL HOUSE 14-16 UXBRIDGE ROAD EALING LONDON W5 2HL
Application No. 203275FULR3**

Thank you for your letter of 8 September 2020 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

Summary

Historic England has concerns regarding the proposals, particularly in relation to the impact of the proposed tall building on the setting of nearby heritage assets.

Historic England Advice

Significance

Perceval House is located on a prominent corner position at the heart of Ealing Town centre. It contains the main administrative offices for the London Borough of Ealing and forms part of a small cluster of civic buildings. Perceval House dates from the 1982 and is arranged over ground plus five storeys with roof plant. It has a distinctive architectural design with brown tiled elevations, corner turrets and projecting balconies. The site also includes an area to the north of Perceval House containing an electricity substation and car park, which bounds onto Longford Avenue to the east and the railway line to the north.



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Whilst the site is not located within a conservation area, it is in close proximity to a number of conservation areas and listed buildings, including the grade II listed Ealing Town Hall, which lies immediately to the east of the site. The Town Hall is designed in a Gothic style with raglan stone elevations and an ornate roof line punctuated by a clock tower. Christ Saviour Church lies further to the east of the site and is grade II* listed. The church is also faced in raglan stone and has a distinctive spire that is visible in many local views. The site is located to the north of the Ealing Green Conservation Area, which contains the grade II Registered Park and Garden of Walpole Park. The park is historically associated with the grade I listed Pitzhanger Manor, which was remodelled by the renowned architect Sir John Soane in the early 19th century. Of note within the landscape is a serpentine lake to the east of the manor which is visually terminated by a grade II* listed bridge, which was refaced by Soane in rubble and flint to give an appearance of antiquity within the landscape.

Impact

The proposals are to demolish Perceval House and redevelop the entire site to provide a range of new buildings. A new 9 storey building containing office accommodation for the London Borough of Ealing would be provided on the corner of Uxbridge Road and Longfield Road, whilst a further five new buildings would be provided to the north containing a mix of retail and residential accommodation. These would range in height from 3 storeys up to 11 storeys with a 21 storey tower on the north east corner of the site, adjacent to Longfield Avenue.

Policy

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) set out the obligation on local planning authorities to pay special regard to safeguarding the special interest of listed buildings and their settings, and preserving or enhancing the character or appearance of conservation areas.

The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development.

Paragraph 131 of the NPPF refers to new development sustaining and enhancing the significance of heritage assets and making a positive contribution to local character and distinctiveness; paragraph 132 refers to the effect of a proposed development on the significance of a designated heritage asset, including development within its setting; and paragraph 137 also states that local authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets to enhance or better reveal their significance.



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When considering proposals which might affect the significance of designated heritage assets, decision makers are required by the NPPF to give great weight to their conservation, and to be satisfied that any harm is clearly and convincingly justified, and outweighed by the delivery of public benefits (Paragraphs 193-196).

Position

As these proposals include the provision of a tall building, they will clearly have an impact on the setting of heritage assets located some distance from the site. In many of the views illustrated within the Townscape and Visual Impact Assessment, which accompanies this application, we consider the proposals to cause a degree of harm to the setting of the affected heritage assets. We have identified three key views where the setting of designated heritage assets would be particularly affected by the proposed new building, as follows:

- View of the grade II* listed Christ the Saviour Church looking west along the Broadway, as illustrated in View 3. This view is seen from within the Ealing Town Conservation Area, where the proposed tall building appears in the clear sky space between the tower of the church and the completed Dickens Yard buildings on the Broadway frontage.
- View of the grade II listed Ealing Town Hall looking north west along New Broadway, as illustrated in View 4. This is a dynamic view within Ealing Town Conservation Area where the proposed tall building appears behind the gothic roofline of the Town Hall.
- View of the grade II* listed bridge in looking north through GII Registered Walpole Park, as illustrated in View 9. The proposed tall building appears in the backdrop setting to park, bridge and 19th century villa houses framing the north side of park, all located within the Ealing Green Conservation Area.

The proposed tall building is considered to have a harmful impact on the setting of the listed Christ the Saviour Church, Ealing Town Hall and the general character and appearance of the Ealing Town Centre Conservation Area, as illustrated in Views 3 and 4, by reason of its presence on the skyline and the potential that this has to draw the eye away from the foreground buildings within the conservation area. This harm is considered to be less than substantial in policy terms and could be mitigated through a reduction in height of the proposed tall building. We are also of the view that the vertical red stripe on the east elevation of the proposed tall building serves to increase the presence and dominance of this building in View 3 in the context of the Christ the Saviour Church. As such, we would recommend that, as a minimum, the proposed elevational treatment of the tall building is reconsidered in order to reduce its visual



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presence and dominance in this view.

The proposed tall building is considered to create a high degree of less than substantial harm to the setting of the Ealing Green Conservation Area, Walpole Park and the grade II* listed bridge in View 9. This view along the serpentine lake is one of the key designed views within the park and is terminated by Soane's early 19th Century bridge and the later layer of mid 19th Century villas that surround the park. Despite some elements of new buildings being visible within the wider backdrop setting, this view tells the story of the former rural village setting of the grade I listed Pitzhanger Manor and the adjacent 19th Century development of low scale buildings and trees that sought to emulate and cherish this rural character. The proposed tall building imposes a central London scale of development and highly urban form that would sit directly on the axis of the designed view and is at odds with the predominantly semi-rural character of this part of the conservation area. This harm could again be mitigated through a reduction in height of the proposed tall building.

Whilst we may consider the harm to heritage assets identified above to be less than substantial in policy terms, we would refer you to policies 194 and 196 of the National Planning Policy Framework. These policies are reflected in the Draft London Plan and Policy D8, part d, of the plan relates to tall buildings and states that *'proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm'*. As such, we would recommend that your authority takes these policies into account when coming to a decision on the proposals and seeks to mitigate harm where possible.

Recommendation

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 196 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.



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This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

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