

From: [REDACTED]

Sent: 03 February 2023 14:38

To: Ealing Local Plan Team <localplan@ealing.gov.uk>

Subject: Draft Local Plan: Heritage Assets including Conservation Areas

To: Ealing Local Plan Team

Members of the Ealing Cricket Ground Conservation Area Panel have discussed our response to the draft Ealing Local Plan, and this representation is being sent on behalf of the Panel.

The introductory section of the draft Ealing Local Plan refers to London Plan policies on heritage and culture in paragraph 0.28 which outlines the Council's proposed development management policies. Paragraph 1.14 in Chapter 1 then mentions that the Local Plan "*shows what needs to be protected, conserved or enhanced such as ... heritage assets ...*".

However, there is little mention in the draft Local Plan of heritage assets or Conservation Areas or of the Council's specific policies relating to heritage assets including Conservation Areas. This gives the strong impression that heritage and Conservation Areas will be of minor importance when decisions on development are taken in the future.

Tucked away at the bottom of Policy SP4.1 in Chapter 3, which deals with good growth, there is a statement which refers to "*taking a strategic approach to the preservation and enhancement of Ealing's built heritage ...*" while paragraph 3.34 of the explanatory text says that "*Ealing has a wealth of designated heritage assets including over 300 buildings and structures covered by statutory listing including six scheduled monuments and four registered Parks and Gardens, as well as 28 conservation areas. In addition, there are over 700 non-designated heritage assets identified in Ealing's local heritage register ... and new development has the potential to offer significant opportunities to enhance and better reveal heritage assets to enable cultural, social and economic benefits of these assets to be realised. This will be achieved by placing heritage at the heart of placemaking, good growth and good design.*" There is no further explanation of how this aspiration will be achieved.

It is significant that there is no mention of heritage assets or Conservation Areas in Chapter 5, which deals with development management policies, beyond a fleeting reference to "*conservation documents*" in the section on "*positive visual impact*" in paragraph 5.12. This is clearly inadequate and means that developers and other applicants for planning permission will not know how or where to find the necessary policy guidance. In the absence of specific information, they could wrongly assume that the Council has no such policies.

We consider that it is important for the Council to set out policies for heritage assets - including Conservation Areas - clearly in the main section of the Local Plan, with further detail to be added in the development management policies in Chapter 5. In addition to setting out the policies, the Local Plan needs to have a form of "signposting" which would direct developers and other applicants for planning permission to more detailed policy guidance for heritage assets, including Conservation Area policy and guidance documents such as the current Character Appraisals of and Management Plans for each individual Conservation Area, the new Addendum Reports for each Conservation Area, the new Generic Management Plan which will apply to all Conservations Areas, and any other documents which emerge from the current review of the Conservation Areas.

The Council's current policy on heritage assets was included in the Local Plan following direction from Historic England's predecessor English Heritage. As a consequence, there are two references in the current Development Strategy document which is the main part of the current Local Plan:

“To care for the borough’s historic character and enhance the significance of heritage assets in regeneration proposals, ensure excellence in urban design and design out crime to make Ealing’s environment safe, attractive and accessible for all.”

“To support the proactive conservation and enjoyment of Ealing’s heritage assets and their significance. In this regard the Council will continue to update and revise its evidence relating to the Borough’s designated and undesignated heritage assets. In particular, we will regularly review our Conservation Area Appraisals and Management Plans and review and update our Local List of heritage assets to ensure that local assets are identified and their significance properly understood during the planning process. In addition to promote heritage-led regeneration, ensure a balanced approach to climate change measures, encourage greater understanding and access to heritage assets and reduce the number of assets at risk.”

We consider that these policies need to be updated as appropriate and included in the main part of the new Local Plan.

In addition, there is a more detailed local policy statement which was also included in the current Local Plan following direction from English Heritage (now Historic England). This policy statement, namely Policy 7C entitled *Heritage*, is in the current Development Management Development Plan Document (DPD):

A *“Development of heritage assets and their settings should*
a) be based on an analysis of their significance and the impact of proposals upon that significance;
b) conserve the significance of the asset in question;
c) protect and where appropriate restore original or historic fabric;
d) enhance or better reveal the significance of assets.”

B *“Development within or affecting the setting of Conservation Areas should*
a) retain and enhance characteristic features and detailing and avoid the introduction of design and materials that undermine the significance of the Conservation Area;
b) retain elements identified as contributing positively and seek to improve or replace elements identified as detracting from the Conservation Area.”

C *“The significance of heritage assets should be understood and conserved when applying sustainable and inclusive design principles and measures.”*

D *“Harm to any heritage asset should be avoided. Proposals that seek to cause harm should be exceptional in relation to the significance of the asset, and be clearly and convincingly justified in line with national policy.”*

Again, we consider that this policy should be updated as appropriate, with advice from Historic England, and included in Chapter 5 of the new Local Plan which deals with development management policies. This is also where there should be “signposting” which would direct developers and other applicants for planning permission to more detailed policy guidance for heritage assets, including Conservation Area policy and guidance documents.

It is essential that developers and other applicants for planning permission are directed clearly from the overall policies set out in the Local Plan to these more detailed documents, especially those which are specific to the Conservation Areas.

With kind regards



on behalf of the Ealing Cricket Ground Conservation Area Panel