

Brunswick Conservation Area Advisory Panel's Response – (Brunswick CAAP)

The set of documents produced by the London Borough of Ealing (LBE) are over 500 pages to read. It is not easy to find a simple set of sub-documents on the same subject in order to establish the full guidelines and any changes they contain. It is therefore very difficult for the average person to comment.

The Brunswick Panel however notes there is scant reference to management of local heritage assets in the new draft document.

The National Planning Policy Framework (NPPF) in paragraph 20 states - *Strategic policies should set out an overall strategy for the pattern, scale and design quality of places (to ensure outcomes support beauty and placemaking), and make sufficient provision for conservation and enhancement of the built and historic environment.*

Chapter 16 expands upon this strategic framework - *'Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account: a) the desirability of sustaining and enhancing the significance of heritage assets
b) the wider social, cultural, economic and environmental benefits that conservation ... can bring;
c) the desirability of new development making a positive contribution to local character and distinctiveness;
d) opportunities to draw on the contribution made by the historic environment to the character of a place.*

London Plan 2021, Point 3.5.11, page 124, describes the value of *securing successful schemes that will enable as many people as possible to access and enjoy the historic environment now and in the future.*

Policy D4, page 117, of the London Plan adds detail to importance of delivering good design. With point d), on page 139 stating - *proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area.*

However the only reference to LBE's heritage policy is on page 495 of the current draft Local Plan (regulation 19) under Point 5.10 *Development proposals should identify the positive aspects of the site and its surroundings from the outset using the Ealing Character Study and where relevant conservation area appraisals and management plans. Design statements should demonstrate an understanding of these aspects and show clearly how the development responds to them.*

This is most certainly not sufficient. LBE has recently been through a long process of consolidating the new 2023 Conservation Area Management Plan for the 28 Conservation areas. (this would have been costly, and was time consuming for both the council and the various panel members who contributed to it)

LBE still has no Conservation Officer. This is totally contrary to guidance in the London Plan, which under Policy 4D Delivering Good Design, point D states - *All development proposals should be subject to a level of scrutiny appropriate to the scale and/or impact of the project. This design scrutiny should include work by planning case officers and ongoing and informal review by qualified urban design officers and conservation officers.*

In this new, and now working, document (i.e. the LBE 2023 CA Plan) there are 'links' to other planning documents, including some of LBE's Supplementary Planning Documents (SPDs), for example Planning New Garden Space 2015, and spd4 Residential Extensions and Housing Design Guidance 2022. These documents should give clear qualified guidance to Planners when reviewing applications:

Either these documents are required to be brought forward into the now proposed Local Plan (regulation 19)

or LBE should be referencing the important points that these and other documents mention in the 2023 CA Management Plan, this to secure Ealing's heritage for the future, as set out in the NPPF.

LBE's new Draft Local Plan inadequately recognises heritage (and conservation) as an essential element of the overall planning process. Additionally it should be given greater emphasis and reflect existing London and National planning protocols more closely.