A Strategic Review of Ealing's Conservation Areas



Key Issues and Recommendations Report
Public & Stakeholder Consultation February 2022









Contents Page

A Strategic Review of Ealing's Conservation Areas: Key Issues and Recommendations

Section	Heading	Page Number
1.0	Background and need for a review	2.
2.0	A Strategic Review	4.
3.0	Methodology	5.
4.0	Outputs	7.
5.0	Key Findings and Recommendations	9.
6.0	Next Steps and Public Consultation	34.
7.0	Conclusion	35.
Appendix 1	List of Conservation Areas in Ealing	36.
Appendix 2	CA coverage in London	38.
Appendix 3	Overall Applications across all CAs	41.
Appendix 4	Proposed changes to boundaries of CAs	44.

HAVE YOUR SAY. This document forms part of the public and stakeholder consultation on the Review of Conservation Areas in Ealing, between the 3rd February and 18th March 2022.

The full suite of consulation documents include:

- A Strategic Review of Ealing's Conservation Areas: Key Issues and Recommendations (this report)
- Draft Generic Management Plan
- Reports and Key Consultation Questions for each Conservation Area in Ealing

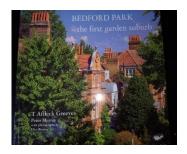
Further details can be seen at Review of Conservation Areas.

Please email your written responses to the questions posed in this document to: localplan@ealing.gov.uk

The consultation deadline is the 18th March 2022.

1.0 Background and need for a Review

- **1.1** This report is the culmination of research into the London Borough of Ealing's conservation areas (CAs) as part of a strategic review carried out between 2018-2021.
- **1.2** The Borough is fortunate in having a diverse range of historic assets which make up its CAs and includes some distinct ranges and exemplars of architecture from medieval times, through to Georgian, Victorian, Edwardian and more modern architecture.
- **1.3** They help 'tell the story' of how Ealing's settlements developed from pre industrialisation times through to the coming of the railways and later development of the 19th Century onwards. They also reflect social trends and how Ealing responded to the needs and aspirations of its growing population through, for example, the Garden City Movement. The CAs, their architecture, together with the surrounding spaces, help define Ealing's unique character and contribute to its 'Queen of the Suburbs' status.

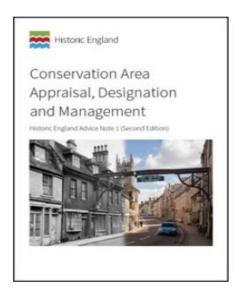


- **1.4** Ealing has 28¹ designated CAs (listed in **Appendix 1**) which cover approximately 677 hectares or 12% of its land area. It has six Article 4 Directions (that restrict permitted development rights) relating to its CAs. Compared with the rest of London (**Appendix 2**), CA coverage in Ealing is close to the average in absolute numbers (30 conservation areas per authority), but below the London average (approximately 33%) in terms of overall land coverage per authority. Coverage between boroughs will vary according to the nature of their area, the significance of their heritage assets and the extent to which they have been identified.
- **1.5** Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990 requires local planning authorities to determine from time to time, which parts of the area are of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. It also places a duty on authorities to review designations from time to time and to determine whether any parts, or any further parts of their area, should be designated.
- **1.6** Furthermore, Section 71 places a duty on local planning authorities to draw up and publish proposals for the preservation and enhancement of any parts of their area which are conservation areas. There is no specific definition of 'time to time', although Historic England¹ suggests that appraisals would ideally benefit from review every five years or so, resources permitting. It has now been some time since the last CA was designated in the Borough (2004) and since the current appraisals were carried out (between 2007 and 2009).

^{1.} Following the creation of the Oak and Park Royal Development Corporation (OPDC) in 2015, its area now encompasses a small section of the Canalside Conservation Area (Sub Area 11: North Acton) and Old Oak Lane Conservation Area, previously within the LB Ealing's administrative area. The OPDC now has responsibility to designate and review CAs within its area. The proposals in this report will not apply to these areas.

- **1.7** However, unlike some other London boroughs, Ealing is fortunate in having a full complement of individual CA appraisals and management plans for each of its CAs. Whilst each varies slightly in terms of style and content, they are broadly similar in approach. Their methodology generally follows Historic England advice and guidelines^{2.} and despite their age, they remain fairly robust, and capture the essential characteristics of each area.
- **1.8** The Council has intended to carry out a review for some time and whilst some preliminary work on this was carried out in 2013/2014 in some areas, a comprehensive review was never completed, or consulted upon.
- **1.9** Similarly, the management plans attached to each appraisal are also generally sound, however they also need updating, for example in relation to the national, regional and local planning framework and the revised permitted development rights regime. Whilst the current plans relate to individual CAs they are quite generic in their coverage and management recommendations and are therefore repetitive to a large extent. There is therefore considerable scope to rationalise the content of these plans and to clarify the recommendations in relation to design guidance and Article 4 Directions for each area.
- **1.10** The CA review links in closely with the Council's aim that closer design scrutiny is paid to all development proposals in future, particularly at early stages of development. The recent publication of the Ealing Character Study and Housing Design Guide and the recent setting up of the Ealing Design Review Panel and the Ealing Community Review Panel will help achieve this. Further details of these panels can be seen at:

<u>Ealing Design Review Panel | Ealing Design Review Panel | Ealing Council</u>
<u>Ealing Community Review Panel | Frame Projects (frame-projects.co.uk)</u>



²·Historic England: Conservation Area, Designation and Management (February 2019)

2.0 A Strategic Review

- **2.1** Given the widespread coverage and relatively robust nature of existing appraisals for each area, it is considered that there is no specific need at present to completely rewrite each appraisal. To do so would be both highly time-consuming and resource intensive.
- **2.2** Instead, a lighter touch 'strategic' review has been undertaken and an assessment made of Ealing's general approach to the preservation and enhancement of CAs, together with a detailed inspection of each conservation area. The review focusses on recent changes to areas rather than on the previous work underpinning their significance, which broadly remains sound. Attention has also been focussed on overhauling and consolidating the management plans and identifying the measures that would enable CAs to function more effectively. Essentially, three fundamental questions have been as part of the review:
 - 1. What have been the key changes since the last appraisals were carried out a decade or so ago?

This explores both large-scale and smaller incremental changes to buildings, spaces and street patterns and assesses what impact they have had (positive and negative) on the character of an area. This includes how the buildings/spaces/areas being assessed relate to their wider context. It confirms or redefines the special interest that warrants designation, highlights additional aspects that contribute to the area's significance or features newly identified as desirable to preserve or enhance.

2. Are any changes needed to the conservation area boundaries?

Current boundaries were established as part of the original designation of CAs. In some cases, these date back as far as 1969. Whilst some boundaries have been revised over the years, including as part of the last review in 2009/10, local planning authorities have a duty to keep boundaries under constant review. The review explores if some of the CAs, in whole or in part, have degraded to such an extent that they no longer merit CA designation and whether there is scope to designate new or extended areas because areas have been improved, or new information about an area, has come forward.

3. Are any additional planning controls/guidance needed?

In some cases, existing CAs currently benefit from specific design guidance for their area. Some also contain Article 4 Directions that restrict permitted development rights and require planning applications to be made to the Council for certain types of development. These exist in relatively few cases at present; only six of the CAs are currently subject to any kind of Article 4 Direction ^{2.} This review explores if any further guidance/controls are justified with particular reference to evidence on the ground of particular issues.

² Bedford Park, Brentham Garden Estate, Hanger Hill (Haymills Estate and Garden Estate), Ealing Town Centre (The Grove), Churchfields (Half Acre Road) CAs are covered in whole or part by existing Article 4 Directions.

3.0 Methodology

- **3.1** As part of the strategic review, an assessment of each CA has been undertaken. This follows best practice guidance in relation to undertaking character appraisals and is based broadly on the Oxford Character Assessment Toolkit which uses a check-list of environmental features to create a guided survey of how each contributes to an area's character under five main headings spaces, buildings, landscape, views and ambience. This has been adapted for use in relation to a more strategic 'rapid review' approach for existing appraisals rather than carrying out a detailed assessment of each area from scratch.
- **3.2** Since the last round of appraisals were carried out, the Old Oak and Park Royal Development Corporation (OPDC) was created in 2015 and its area now encompasses a small section of the Canals Conservation Area (Sub Area 11: North Acton) and Old Oak Conservation Area, previously within the LB Ealing's administrative area. The OPDC now has responsibility to designate and review CAs within its area.
- **3.3** For each conservation area the following actions have been undertaken:
 - A visual walking survey, on a street by street basis, with photographs taken and notes made on character features with reference to spaces, buildings, landscape, views and ambience. The focus was on identifying key changes and factors which have detracted or enhanced areas in relation to the special interest of an area. This included looking at any large- scale development changes, including through regeneration and Local Plan site allocations that have taken place since the area was designated/last reviewed, together with smaller, more incremental changes, such as to windows, roofs, front gardens etc. that have taken place, and any recent trends. Any changes in greenspace (landscape, trees and open spaces) that have occurred and any changes to the public realm including traffic management, street furniture and pedestrian environment were also assessed. As well as within the CA itself, the survey also extended to just beyond the current boundaries of the CA to assess if there was scope to amend boundaries here.
 - Desk top analysis of each area with reference to historic maps (regression) and planning, appeal and monitoring information including heritage assessments undertaken to support individual planning applications and appeals. This included reference to how conservation-related planning policies were being applied to the area and supported at appeal, and whether there has been any discernible impact from the imposition of Article 4 Directions in relevant areas (and indeed whether additional ones could be justified). Recommendations in existing management plans have also been revisited to see if they have been implemented and if not, whether there is still a need for them.
 - Reference to a range of sources of information including from the Borough Archive and Local Studies Libraries, local history and interest group collections, the Greater London Historic Environment Record (GLHER) and other on-line information was made wherever possible. Any new research or appraisal work identifying the special character of areas, stemming from any heritage statements supporting planning

applications and information supporting the designation of neighbourhood plans in the area, were also considered.

• Meetings with stakeholders; this included meetings with all of the Conservation Area Advisory Panels (CAAPs). 20 separate meetings were held with panel representatives during 2018 and 2019 and a further 17 meetings between 2020 and 2021. Meetings were also held with other stakeholders such as the Borough's planning officers and officers from adjoining planning authorities where CA boundaries overlap (for e.g. LB Hounslow in relation to Bedford Park). The review was also discussed at two Conservation Advisory Panel Forums in 2018 and 2019 and regular meetings have been held with CAAP representatives, the CA Forum and the Ealing Civic Society, throughout the review. The views of stakeholders have contributed significantly to the review process.



Question 1: Do you agree with the approach and methodology followed in relation to the review of Ealing's conservation areas?

4.0 Outputs

4.1 The review includes the following outputs:

General Overview:

- A general commentary on the overall condition of Ealing's CAs and recent changes/pressures affecting them.
- An update in relation to planning policies and guidance that relate to CAs at national, regional and local level, including references to the emerging Ealing Local Plan.
- An assessment of Ealing's Planning Service (statutory role) in relation to the handling
 of planning applications and enforcement issues within CAs, together with wider
 process and governance issues.
- An assessment of the current operation of the Conservation Area Advisory Panels (advisory role) in relation to CA designation process and the development management process.
- The scope for further joint working, and sharing of resources, in future between the Council, the CAAPs and other interested bodies in future.
- A review of non-designated heritage assets ('key unlisted buildings' and 'positive contributors') including some rationalisation of how they are recorded within CAs and relate to other local designations.
- How digital access to conservation information and best practice can be improved in future.

For each CA:

- **4.2** A street by street survey on foot has been undertaken to assess the condition of the CA and recent changes. This has been recorded through photographs and informal notes, and these have been used to inform individual reports for each of the 28 CAs. These reports set out the following information:
 - Summary of stakeholder information for each area from discussions with the CAAPs
 - Commentary and Recommendations in relation to the following headings:
 - ✓ Overview of changes since the last appraisal.
 - ✓ CA boundaries and any need for revisions.
 - ✓ Key unlisted buildings including positive indicators- update since last appraisals.
 - ✓ Threats and negative factors identified in last appraisal and current position.
 - ✓ Gap sites and capacity for change including any new or emerging development sites.
 - ✓ Public realm issues.
 - ✓ Management Plan review and recommendations.
 - ✓ Article 4 Directions Need for any changes to existing or whether new ones are justified.
 - ✓ Other controls and guidance- review in light of evidence on the ground.
 - ✓ Planning Data including analysis of statistical Information relating to planning applications, appeals and enforcement activity between 2007 and 2021.

- **4.3** It is proposed that this work is used as a basis for an updated note to go alongside each of the existing CA Appraisal, in the form of an **Addendum Update Note**. In line with Historic England guidance ^{2.} this will encapsulate the following:
 - What has changed.
 - Confirming or redefining the special interest that warrants designation.
 - Any new recommendations.
 - A revised management strategy.
- **4.4** In terms of the **Management Plans** that currently accompany each CA Appraisal, once again these are broadly sound but need updating in terms of the policy references made. Many of the themes covered are quite generic and repeated for each CA, and so in order to make the guidance more user-friendly, a single reference document covering all CAs has been prepared. The revised **Generic Management Plan** contains:
 - References to planning policies relevant to CAs
 - The process for dealing with planning applications within CAs
 - How development in CAs will be managed
 - The core principles for preservation and enhancement in CAs.
- **4.5** Finally, whilst the revised generic management plan provides the core principles and a detailed framework for dealing with development affecting all CAs, it is still considered beneficial to complement this with **Design Guidance** covering the local vernacular and unique architecture of each CA. These will build on guidance already in existence for CAs, in a few cases, and provides advice on the most pressing issues as identified as part of the strategic review for each CA. These include guidance on windows and doors, roof alterations and extensions for each area together with references to appropriate materials (bricks, tiles, render, joinery etc.) and boundary treatments (fences, gates, hedges etc.).
- **4.6** In essence, the strategic review of CAs consists of four main strands:
 - 1. Key Issues and Recommendations from the Strategic Review of CAs covering recent trends and developments, the need for boundary changes and the scope for additional planning controls and guidance. (Draft completed in 2020 and informed by further consultation with the CAAPs in 2021-i.e. this report)
 - 2. CA Appraisal Update Addendum Reports prepared for each of the 28 CAs, reflecting recent changes in the character of these areas together with specific recommendations on boundary changes, management issues and design/controls. These will sit alongside the existing detailed CA Appraisals, to provide updated assessments for each area. (Drafts completed in 2020 and further consultation carried out with the CAAPs in 2021)
 - 3. Generic Management Plan- a single document covering updated policies and guidance relating to the development management process and procedures, together with guidance on the key development considerations that affect all CAs. This will replace the 28 individual, but largely repetitive, existing management plans. (Draft completed in 2020 and informed by further consultation with the CAAPs in 2021).
 - **4. Design Guidance** for each CA, this will complement the generic management plan and address in more detail the specific architectural issues that are unique to each CA. (Drafts in progress, but not yet completed)

5.0 Key Findings and Recommendations

Overview of changes since last appraisals

- **5.1** All the CAs have undergone some change over the last decade since the last appraisals were carried out, some more than others. As one would expect the two key town centre CA appraisals (Acton Town Centre and Ealing Town Centre) have seen the greatest changes as a result of large-scale new commercial and residential developments. This is likely to increase as Ealing responds to the emerging London Plan growth targets and benefits from transport improvements, particularly from CrossRail (Elizabeth Line).
- **5.2** Many areas have remained relatively unchanged, though small-scale, yet incremental changes can be seen in all areas, particularly in areas that are not covered by an Article 4 Direction. The cumulative impact of incremental small-scale changes may have as great an effect on the significance of a heritage asset, such as a conservation area, as a larger scale change. Where the significance of a CA has been compromised in the past by unsympathetic development, consideration still needs to be given to whether additional change will further detract from, or can enhance, the significance of the CA. Each **CA Appraisal Update Addendum Report** includes a breakdown of planning applications in the specific CA area. This covers the past decade and is broken down by planning application type and decision including appeals and enforcement activity. This helps identify the specific issues and trends in each area.
- **5.3** The overall level of planning applications by type within the 28 CAs can be seen in **Appendix 3a.** Those CAs recording consistently high levels of applications between 2007 and 2021 include Ealing TC (Rank 1), Bedford Park (Rank 2), Ealing Green (Rank 3), Hanger Hill Haymills (Rank 4) and Mount Park (5). Those with the lowest levels include Acton Green (Rank 25), Hanwell Clock Tower (Rank 26), Northolt Village Green (Rank 27), Hanwell Cemeteries (Rank 28) and Old Oak Lane (Rank 29). Most applications in CAs were approved (74% on average) though this varied by CA with 84% approved in Mount Park and 83% in St. Stephen's CAs but only 57% in Hanwell Clock Tower and 63% in Northolt Village CAs. This suggests that applicants/agents/householders in some areas would especially benefit from additional guidance and clarity on what is acceptable and not acceptable in terms of development proposals.
- **5.4** Incrementally, the loss of front gardens and boundary walls, infill extensions, replacement windows and doors, roof alterations including roof windows have the greatest visual impact. These are continuing in most areas, albeit a significant amount of 'degradation' is historic and occurred before these areas were designated. Loss of original shopfronts and poorly designed replacements and signage are key issues in the Town Centre CAs and those containing local shopping parades.
- **5.5** The fabric of most of the CAs remains relatively sound, although there is evidence of deterioration in some areas, for example in parts of the Cuckoo Estate and several of the smaller commercial centres and shopping parades, where shop frontages detract from the area. There have been some improvements to the CAs listed on Historic England's Heritage at Risk Register but they remain on the register for now (further details are set out in paragraph 5.13).

5.6 t is recommended that a range of measures are carried out to help control changes, and mitigate their impacts, and generally improve the design of development. These include:

- An extension of the Article 4 Regime across some CAs
- Further design guidance across the board, both generic and specific.
- A coordinated approach towards enhancement opportunities including development of town centre strategies, investment and access to grant aid opportunities.

5.7 Further details of these measures are set out in the CA Appraisal Update Addendum Reports and the Generic Management Plan, and they are also referred to below.

Designation and Boundary Changes.

5.8 In all areas, the rationale for the original CA designation in terms of their special architectural and /or historical character has been well documented and still very much remains in evidence on the ground. Whilst change has occurred in many areas, the core elements of the original significance of most areas remain intact and there is on-going justification that these should continue to be preserved and enhanced.



5.9 It is not therefore recommended by officers that any of the existing conservation areas should be de-designated in their entirety, although a large part of the Canalside CA and Cuckoo Estate CA is recommended for de-designation. The one possible exception to this relates to the Hanwell Cemeteries; these are separately listed as Grade II Parks and Gardens, as well as being part of a designated conservation area. There is a question mark here about whether CA status duplicates the listed status and adds any further protection or control in practice. It is not recommended to remove the CA designation at this stage, but the matter should be explored further as part of the consultation with the public and conservation bodies.

5.10 However, a number of boundary changes are recommended by officers to reflect recent developments and the deterioration in the fabric of some parts of CAs area, and to create more 'defensible' CA boundaries particularly on the edge of CAs, and to reflect certain 'anomalies' in the original designations. The aim of these changes to is create more rational boundaries; by removing some areas and adding others, this approach seeks to preserve the best or most significant features of each area and ensure that their value is maintained in future. Proposed additions/reductions have been identified from the strategic review itself, including through CA Panel suggestions. Some of the suggested additions have not felt to be justified, particularly where it is considered that their inclusion would de-value the existing stock of CAs.

5.11 In summary:

- In absolute numbers, the officer recommendations, if agreed, would mean that 13 would increase, 9 areas would decrease and 6 would not change. So, the overall effect is fairly neutral in terms of changes in absolute numbers.
- In percentage terms, the land area of the CAs is proposed to increase by 5%, decrease by 13%, so these changes will result in a net reduction of 8% across the CAs as a whole. The land area covered by CA designation would fall from 677 ha presently, to 622 ha, a net reduction of 55 ha.
- If agreed, the western extension to Haven Green would add 17 ha and the new Northfields CA (in its entirety) would add 106 ha. This would mean that the CA land area would increase by 21%, decrease by 13%, resulting in an 8% increase across the CAs as whole. The land area covered by CA designation would increase from 677 ha presently, to 732 ha, a net increase of 55 ha.

The key suggested boundary changes are set out in the following table:

CA	% Increase	% Decrease	No	% Net Overall
			Change	Change
Acton Green		-19		-19
Acton Park		-6		-6
Acton Town	+1			+1
Bedford Park	+4		,	+5
Brentham			√	0
Brunswick	+5			+5
Canalside	+3	-96		-93
Churchfields			✓	0
Creffield	+22			+22
Cuckoo		-85		-85
Ealing Common	+5			+5
Ealing Cricket	+65			+66
Ealing Green	+8	-2		+6
Ealing TC Commercial*	+4			+4
Ealing TC Residential*			\checkmark	0
Grange and White Ledges		-30		-30
Hanger Hill Garden Estate			\checkmark	0
Hanger Hill Haymills			√	0
Hanwell Cemeteries			✓	0
Hanwell Clock Tower	+11	-3		+8
Hanwell Village Green		-2		-2
Haven Green	+41**			41**
Mill Hill Park	+1			+1
Montpelier Park		-10		-10
Mount Park		-5		-5
Northolt	+11			+11
Northfields	New**			+100%**

Norwood Green		-10	-10
St Marks and Canal		-3	-3
St Stephens	+33		+33

^{*}Ealing Town Centre is split into 2 areas- commercial and residential- for the purposes of this analysis.

5.11 The key proposed **Additions** recommended by officers are:

- Ealing Cricket Ground: Increase area by approximately +65%- Add Madeley Road and Westbury Road (and 56-64 Hanger Lane), directly abutting the CA boundary to the south, due to their significance. Also add the house at 16 Park View Road to the CA boundary due to its significance.
- **Creffield:** increase in area by approximately **+22%** Add Fordhook Avenue and Byron Road, Chatsworth Gardens and Buxton Gardens, the houses on Creffield Road (82-100) opposite the Japanese School due to their significance.
- St Stephens- increase in area by approximately +33%- Add west of the former Church covering 1-5 Hollingbourne Gardens, 112-132 Argyle Road, 23-27 St. Stephen's Ave, 14-28 St Stephen's Ave, 37-49 Colebrook Ave, 42-52 Colebrook Ave, 1-9 Ravensbourne Gardens due to their significance. Add Shopping area south along The Avenue comprising 1-27 Castlehill Parade, and 2-24 The Avenue, due to its significance.
- **Ealing Green**: increase in area by approximately **+6%** Add the Lammas Enclosure (including East Lodge and The Pavillion), 69-83 Warwick Road- 3 storey villas on southern side of The Park at junction with Kerrison Road, Vestry Hall, Ranelagh Roaddue to their significance (+8%).
- Northolt: Increase by approximately +11% Add 1-11 Station Parade and 207-213 Ealing Road and small triangular to northern edge of CA due to their significance. Add 1-14 Mowbray Gardens, Parkview, Rose Cottage, 1, 3, 5, 2a, 4a, 2, 4, 6, 8, Rectory Gardens to protect the setting of Belvue Park.
- **Ealing Common**: increase by approximately **+5%** Add Tring Avenue (2-12, 3-13)northern section of this road contains large villas of a very similar age/style to the
 rest of Leopold Road that is within the CA and Gunnersbury Avenue (12-20, 13-21)large villas, of similar age/type to the ones to the north in this road (within the CA)
 due to their significance. Add the shop buildings opposite to Ealing Common station
 to the CA boundary (1a,1,2,3,4 The Bridge, Uxbridge Road)
- **Bedford Park**: increase by approximately **+5%** by extending to the western end of Fielding and Blandford Roads up to The Avenue (including Ormsby Lodge), due to their significance and anomaly in current designation.
- Hanwell Clock Tower: Increase area by approximately +11%- Add locally listed former sorting office at corner of Station Rd and Laurel Gardens (including railings and post box on the Station Road frontage). Add 1-16 George Street- on western side of carpark due to their significance.

^{**} to be reviewed following public consultation

- **Brunswick**: Increase area by approximately **+5%.** Add properties on the Western Avenue (Greystoke Terrace) -identical style and vintage to rest of designated CA area, due to their significance.
- **Ealing Town Centre**: increase by approximately **+4%** by moving Bond Street from Ealing Green to reflect more commercial nature of the town centre.
- Acton Town Centre: Increase by approximately +1% to address existing anomaly in relation to designation of the burial ground by including all of it within the CA.
- Canalside: minor increase by +3% mainly in Sub Area 3 Williams Rd (Old Oak Bridge) to Western Road by including open space and areas around Old Oak Bridge and Southall Recreation Ground, due to their contribution to the setting of the canal.
- **Hanwell Village Green:** minor increase by +1% by adding 32 Golden Manor to the CA boundary.
- Mill Hill Park- minor increase by +1% by adding 105, 107, 107a Mill Park Road to the CA boundary

Other proposals investigated where it was considered that the case for adding to existing CAs was now marginal included Carlton Road and Nos 31 to 89 Gordon Road (**Haven Green CA**) It is recommended that these are reviewed following public consultation.

5.12 The proposed key **Reductions** are:

- Canalside: reduce canal network by approximately -93% -with exception of stretch running through St Marks and Canal CA (listed locks), Sub Area 3 Williams Rd (Old Oak Bridge) to Western Avenue and Sub Area 4)- area around Bull's Bridge only. CA Designation considered inappropriate.
- Cuckoo Estate: reduce area by approximately -85% by scaling back boundary to Cuckoo Avenue, the Hanwell Community Centre and surrounding open space, due to deterioration and loss of significance.
- **Grange and White Ledges**: Reduce area by approximately **-30%** remove Sub area 1) Edgehill Road and Castlebar Hill from CA- this area is distinct from SPAN area and is not considered significantly special in terms of the housing here.
- **Acton Green**: reduction by approximately **-19%** removal of sub area 1, the modern Beaconsfield Estate.
- Norwood Green- Reduce area by approximately -10%. Remove St. Mary's south (central) Avenue- post war housing development. Remove 33-44 Norwood Close 1-28 Norwood Rd – modern flats.
- **St Marks and Canal:** Reduce areas by approximately **-3%.** Remove modern Walker Close. Remove Mallard Close- modern houses.
- Acton Park: Reduce area by approximately -6% by removing north east section around East Acton School and Goldsmith Arms PH- reflecting recent redevelopment plans for the PH site.
- Montpelier Park: Reduce area by approximately -10%. Remove modern infill development on northern section of Mount Avenue: 1-13 Juniper House, 22-23 Mount Ave, 1-25 Park Gate, 1-23 Westmoreland Place, 1-12 Willowmead Close.

- **Mount Park** Reduce area by approximately **-5%.** Remove modern infill development on north eastern side of Eaton Rise: Chesterton Court, Cecil Court, The Firs, Elmcroft Close.
- **Ealing Green:** Reduce area by approximately **-2%** by moving Bond Street from Ealing Town Centre CA to reflect more commercial nature of the town centre.
- **Hanwell Clock Tower**: Reduce area by approximately **-3%** Remove modern 1-7 Clocktower Mews from the CA boundary.
- Hanwell Village Green- Reduce area by approximately -2% Remove 116a, 116b, 116c, 118a, 118, 120, 120a Church Road (modern) and to ensure consistency with rest of CA.

Other proposals investigated where it was proposed that the case for reduction of existing CAs was now marginal included the redefinition of area around Top Lock/ Glade Lane bridge by removing modern housing/industrial developments including Works between Canal and Poplar Avenue, Baxter Close and potentially Barge Close (**St. Mark's and Canal CA**)

5.13 Other boundary changes were also considered in each CA as set out in the CA Update Addendum Reports and through consultation with the CAAPs in 2021 but it was considered that the case to pursue these is less strong than the priority ones listed above. The requests by the CAAPs to extend CA coverage that were not considered to be justified included:

- Triangle between Fairlawn Avenue, Fairlawn Court and Ravenscroft Road (Acton Green)
- 'Poet's Corner': Rectangular area bounded by Churchfield, Goldsmith, Shakespeare and Spencer Roads (Just to north of **Acton TC** and just west of **Acton Park**)
- The onetime (LA) flats/houses in Esmond Road (**Bedford Park**)
- Brentham Fields (Brentham Garden)
- Twyford Sports Ground and extension of CA north and south of Uxbridge Rd, and back to Ealing Common (Creffield)
- Former Barclays Sports Ground (Ealing Cricket Ground)
- Craven Road/Craven Avenue (close to **Ealing TC**)
- Groveside Close and Groveside Gardens (Hanger Hill Garden Estate)
- Boileau Road (Hanger Hill Haymills)
- East of former Church covering Stephen's Rd, Wimborne Gardens and Sherbourne Gardens and north of CA covering 38 & 40 Cleveland Road (St Stephens).
- Area north of Castlebar Road (**Grange and White Ledges**)
- Pinches Yard, south of The Grove (**Ealing Town Centre**)
- Area north of CA comprising York Road, Cherington Road and Springfield Road,
 Cherington House and the former Carnegie Library, the schools fronting Springfield
 Close, areas either side of Uxbridge Road (Hanwell Clock Tower).
- Billets Hart Close, the western side of St. Margaret's Close and the William Hobbayne open space (St. Marks Church and Canal).

- Area south of University of West London and westen end of Beaconsfield Road (Ealing Green)
- Residential block including Amherst Road, Amherst Avenue, Waldeck Road, Denbigh Road, St.Leonard's Road, Mortimer Road (Haven Green)
- It should be noted however that each of the above proposals may be reconsidered
 following the public and stakeholder consultation exercise, especially where
 further information emerges about the significance of the heritage assets in these
 areas, and where there is strong support to include these areas for CA designation.
 All proposals are set out in detail in the individual CA Reports and Key Consultation
 Questions for each Conservation Area in Ealing.
- **5.14** A map showing the revised boundaries is included in **Appendix 4**. These proposed boundary changes may be subject to change following the public and stakeholder consultation exercise.
 - Question 2: Do you agree with the proposed boundary change recommendations in principle?
 - Question 3: Do you agree with the specific boundary change recommendations for each CA? (refer also to the individual reports and key questions for each conservation area)
- **5.15** The strategic review focussed on existing CAs and their immediate surroundings. A detailed review of areas outside CAs, to assess for the **potential to establish new CAs** has not been carried out. However, no proposals for entirely new CAs were initially put forward by the CA Panels as part of the meetings on the strategic review and there seems to be a general consensus that the most special areas of historical and architectural importance of the borough have already been designated as CAs over the last 50 years, i.e. since the Civic Amenities Act of 1967 introduced the concept of CA designation. The one exception to the this is that following further informal consultation with the CAAPs, a case has now been put forward to create a new CA along Northfields Avenue and the residential hinterlands on either side (**Northfields CA**). It is recommended that this is considered further as part of the public and stakeholder consultation.
- **5.16** However, in order to address any other potential gaps in coverage, as part of the wider public engagement on this strategic review, it is recommended that members of the public and other groups be invited to put forward any other areas of the Borough for consideration as potential new CAs.
- **5.17** A review of past committee reports has revealed that one area in **Greenford** was considered for CA designation in 2003 (Greenford Area Committee on 26.11.03). This area encompassed **the two churches of the Holy Cross and surrounding buildings** and comprises

the remaining traces of the old village of Greenford, parts of which are medieval in origin. This proposal was not taken forward, possibly due to a lack of public support at the time, but it may be worth revisiting and re-evaluating the significance of this area.

- **5.18** Around that time consideration was also given to designating the **Ravenor Park Estate in Greenford**, but it was concluded that this area was not considered to be of sufficient special architectural or historical interest to warrant CA designation. Several planning issues associated with the bungalows in the area were identified and consideration was given to introducing an SPG and an Article 4 Direction (to cover roof extensions) but again this was not considered to be justified and never taken forwards. There are not considered to be any changes in circumstances to warrant CA designation or any additional controls in this area.
 - Question 4: Do you agree with the proposal for a new conservation area at Northfields? (refer also to the individual report and key questions for the Northfields CA proposal)
 - Question 5: Is there any other area in Ealing, not currently covered, that should be considered for CA designation in future? (Please specify)

Key unlisted buildings including positive indicators

5.19 Some non-designated heritage assets are considered to be sufficiently significant to the local community or to the local environment that they are formally identified by the Local Planning Authority. In the Borough of Ealing these non-designated assets, and what is considered special about them, are recorded in the Local Heritage Register, which consists of the Local Heritage List and the List of Buildings of Façade or Group Value. They are also mentioned in the CA Appraisals which, in addition, include a third category of buildings of special note within CAs which are known as 'key unlisted buildings'. These include nondesignated heritage assets that do not form part of the Local Heritage Register, but contribute positively to the CA by virtue of their design, form, elevations and/or historical integrity.



5.20 The way that the current CA Appraisals make reference to the **positive contributors** varies. There is an inconsistency in approach in that within some appraisals there is no specific reference to positive indicators either in the text or on the townscape maps, if they exist. In some cases, only a few such buildings are identified whilst in others virtually all

buildings within the CA is classified as positive contributors. As part of the strategic review the positive contributors are identified in a more consistent approach.

- **5.21** Whilst most of the current CA Appraisals refer to 'key unlisted buildings', these actually include a mixture of positive indicators, locally listed buildings and buildings of façade or group value. The situation is further complicated by the fact that the Council's Heritage Register was reviewed in 2014-i.e. after the last review of CA Appraisals that was carried out between 2007-2009. Positive contributors (around 600 buildings) were originally included alongside the local list. However, when the Local Heritage Register was last reviewed by the Council in 2014, they were removed from the Register.
- **5.22** It would appear that some buildings on the original local list were re-classified as positive contributors within their respective CAs with the intention that these heritage assets would be reviewed as part of a future review, although this is not entirely clear.
- **5.23** As part of the current strategic review, an attempt has been made to rationalise the situation by defining the status of all non- designated heritage assets within each CA. This includes confirming those assets previously identified, removing those that have since been redeveloped/demolished and making recommendations to include new ones where appropriate.
- **5.24** For each area, recommendations are made to assign each 'key unlisted building' to one or more of the following categories:
 - Local Heritage List
 - List of Buildings of façade or group value
 - Positive Contributor.
- **5.25** The CA Addendum Update Reports set out the updated key unlisted buildings for each area. The majority of those identified in one form or other as part of the last CA Appraisals remain valid in terms of their importance. However, in some cases they are recommended for removal because they no longer exist or have lost their value through redevelopment. In other cases, some new ones not previously identified are recommended for inclusion. Some of the positive contributors of particular local importance are also recommended for inclusion on the list of locally important buildings or buildings of façade or group. In a few cases, it is also recommended to assess buildings for potential statutory (national) listing. Once agreed, it is recommended that all undesignated heritage assets are added to the Council's updated planning constraints maps.
- **5.26** It should be noted that the role of all non-designated heritage assets in the Borough, and the way that they are recorded, will be reviewed as part of the heritage policies within the revised Ealing Local Plan. It is also important to note that the absence of any particular heritage asset from the local list does not necessarily mean that it has no heritage value, simply that it does not currently meet the selection criteria or that it has yet to be identified.
 - Question 7: Have all the key unlisted buildings (undesignated heritage assets) been identified in your CA (refer also refer also to the individual reports and key questions for each conservation area)

Threats and negative factors identified in last appraisal and current position

5.27 The original CA Appraisals and Management Plans identified a number of elements at risk or under threat and negative factors. These included elements such as loss of front garden trees, fences and walls, unsympathetic extensions including bulky rear dormers, loss of traditional windows and inappropriate replacements, inappropriate shopfronts etc. They also identified threats to particular buildings or spaces or heritage assets in general.

5.28 Each of the identified elements has been reviewed based on the evidence on the ground, and a judgment is made on whether matters have improved or worsened in recent years, and indeed, if any new factors have come to light. Recommendations are then made for each CA about how on-ongoing or new threats should be mitigated and controlled; this may include the introduction of new Article 4 Directions or further design or policy guidance. These are detailed in the individual CA Addendum Update Reports (see also later sections in this report).

Historic England – Heritage at Risk Register

5.29 Five of Ealing's CAs (Acton TC, Ealing TC, Haven Green, Cuckoo Estate, Norwood Green) remain on Historic England's Heritage at Risk Register. This is due to the poor and deteriorating condition of some parts of these areas. These are longstanding classifications that should be reviewed on a regular basis, usually annually.



Heritage at Risk: Latest Findings

Explore key trends revealed by our 2019 Heritage at Risk

Register.

5.30 As part of the assessment of condition of CAs through the strategic review, it is was recommended in 2021 that some changes are made to their classification within the Heritage at Risk register as follows:

Conservation Areas overall

- Acton Town Centre is currently listed with its Condition being classed as 'Poor',
 Vulnerability as 'Medium' and Trend as 'Deteriorating'. On the basis of the current
 strategic review, it is recommended that HE is advised that the Trend is now 'Stable'.
- **Cuckoo Estate** is currently listed with its condition described as 'Poor', Vulnerability as 'Medium' and Trend as 'Deteriorating'. This remains an accurate description.
- Ealing Town Centre is currently listed its Condition being classed as 'Poor', Vulnerability as 'Medium' and Trend as 'Deteriorating'. On the basis of the current strategic review, it is recommended that HE is advised that the Condition is revised to 'Fair' and Trend as 'No significant Change'. Vulnerability remaining as 'Medium'.

- **Haven Green** is currently listed with its Condition being classed as 'Fair', Vulnerability as 'Medium' and Trend as 'Deteriorating Significantly'. On the basis of the current strategic review, it is recommended that the Trend is revised to 'Deteriorating'.
- **Norwood Green** is currently identified in Historic England's Heritage at Risk Register with its condition described as 'Vey Bad', Vulnerability as 'Medium' and Trend as 'Deteriorating Significantly'. This remains an accurate description.

The above changes were agreed with Historic England as part of the reassessment of the Heritage at Risk Register in 2021. Local authorities are required to reassess entries in the Register with Historic England on an annual basis (quite separately from the CA Review) and each will be reviewed again in 2022, taking into account updates to the Condition, Vulnerability and Trend of each area. The Council will consult with, and take into account, the views of the relevant CAAPs as part of the reassessments.

Individual Buildings at Risk

5.31 The Register also includes individual buildings at risk within the Borough that were considered vulnerable at the time of the last appraisals. Within the CAs, these include:

- Crossways, 134 Church Road, Hanwell
- Norwood Hall, Norwood Green Road, Southall
- Stable Block, Brent Lodge Park, Hanwell
- Christ The Saviour Church, New Broadway, Ealing
- Hanwell Flight of Locks and Brick Boundary Wall at St Bernard's Hospital
- St Bernard's Hospital, Uxbridge Road, Southall
- Hanwell Community Centre, Cuckoo Avenue, Hanwell
- Hanwell Station, main up-side building and down-side island platform, Station Road, Hanwell.

5.32 The current position in relation to these buildings is set out in the Addendum Update Reports for each CA. Several of the above buildings/structures have been subject to recent works that will result in their repair and redevelopment, and their futures 'secured' and so the recommendation to Historic England is that that they should be removed from the Register once relevant works have been satisfactorily completed. With regard to the CAs, the introduction of a new generic management plan and specific design guidance, tighter regulation through the use of Article 4 Directions and better coordination through town centre strategies (in relation to Ealing Town Centre CA/Haven Green CA and Acton Town Centre CA) should all help provide a framework to enable the area to come off the register in the future.

Question 8: Do you have any comments on the Heritage at Risk Register and the buildings/CAs currently included in it?

Gap sites and capacity for change

- **5.33** The original CA Appraisals and Management Plans identified some sites that were considered inappropriate to the CA; i.e. an eyesore because of its design (usually modern), its scale or deteriorating condition. Such gap sites also included land identified for redevelopment, through the Local Plan site allocation process. The Addendum Update Reports for each CA assess whether such sites still exist in their original form.
- **5.34** In many cases, these sites have been redeveloped and have made a more positive contribution to the CA, but some remain undeveloped. For the remaining undeveloped larger sites, some guiding principles are set out to help ensure that these can preserve and enhance the CA in future when they do come forward.

Public Realm Issues

- **5.35** The original CA Appraisals and Management Plans identified a range of public realm issues including street furniture, lighting, traffic calming measures, bollards, railings, trees and landscaping. Public Realm issues identified also include advertisements and signage in the commercial centres, and reflects on how new forms of advertising such as digital display units that are becoming increasingly more prevalent. These elements impact significantly on the CA character but have in the past often fallen outside normal planning control and/or managed by other agencies. A recent <u>High Court ruling</u> in relation to prior approval applications on telephone kiosks highlights that they should not be used primarily for advertising purposes.
- **5.36** The range of lighting columns varies throughout the CAs, and range from traditional cast iron to modern 'hockey stick' types. The Council replaced many columns under the Street Lighting PFI from 2005. A number of cast iron columns were removed during the course of the replacement programme, although several cast iron columns survive particularly throughout the Northfield and Walpole Wards which is now known as the 'Heritage Quarter' (falling within Ealing Green CA). The Council retains a small stock of cast iron columns in storage and it is recommended that where opportunities arise as part of new development, and subject to adequate funding for installation and maintenance, that these are re-introduced as appropriate within CAs.
- **5.37** The Addendum Update Reports assess whether any issues are still relevant today and what should be done to tackle them. Within the larger town centres (Ealing and Acton) it is recommended that such matters can be coordinated most effectively through town centre strategies (see Management Plan section). This also links into the Council's current aim to develop a more consistent approach towards design and image across public spaces and the wider public realm. Further work is recommended to be undertaken to ensure that street furniture, signage and road markings are designed more sympathetically within CAs.

Management Plans

5.38 Each current CA Appraisal is accompanied by a Management Plan. These provide a vehicle for reinforcing the positive character of an historic area as well as for avoiding, minimising and mitigating negative impacts identified as affecting the area. These may also

outline opportunities to better reveal or enhance significance, possibly through the location or design of new development.

- **5.39** As previously noted, whilst these plans are useful in providing guidance for each area, there is a significant amount of repetition around policies and principles. The level of detail contained in these plans also varies and whilst some are accompanied by useful design guides (for example Brentham, Hanger Hill Haymills, Hanger Hill Garden Estate, Half Acre Road) many lack the specific guidance, particularly around architectural elements and features based on their unique character and issues.
- **5.40** As part of this review, and in order to improve the effectiveness of management plans, and make them more user-friendly for householders, developers and planners, it is proposed that they are they are replaced by the following documents:
 - **A. Generic Management Plan:** a single reference document applicable to all CAs and covering the following:
 - References to planning policies and principles at national, regional and local level relevant to CAs.
 - The process for dealing with planning applications within CAs.
 - How development in CAs will be managed.
 - The core principles for preservation and enhancement in CAs.

(Draft completed and updated).

- **B. Specific Design Guidance for each area** guidance for the development and management of each CA, based on the local vernacular and unique architecture and circumstances affecting each CA, where need identified. These will:
 - Build on guidance already in existence for a few of the CAs and provide advice on the most pressing issues (identified as part of the strategic review) for each CA.
 - Include guidance on windows and doors, roof alterations, extensions etc. for each area together with references, and links, to appropriate materials (bricks, tiles, render, joinery etc.) and boundary treatments (fences, gates, hedges etc.).
 - Provide information on appropriate contractors in the area that are familiar with the bespoke architecture and styling of the CA, together with details of where appropriate 'stock' or 'repository' of original materials can be found.

(Work ongoing, but drafts yet to be completed for each CA).

- **5.41** It is recommended that this guidance is made available electronically so that it can be easily updated. It should also link to guidance produced by CAAPs and others, for example to the individual listed house 'Log-Book' and Technical Notes produced by the Bedford Park Society.
- **5.42** The design guidance element of the management plans will also need to link into work carried out as part of the <u>Character Study and Housing Design Guidance</u>, and in relation to tall buildings, the Council's <u>Statement on the development of tall buildings</u> and <u>Local Planning Policy Statement on tall buildings (LPPG)</u> will also need to be taken into account.

This work is part of the evidence base for the Local Plan review and scopes the extent to which small sites and tall buildings in the Borough can contribute to development needs in future, and how design can be improved across the board.

❖ Question 9: Which CAs in Ealing should be prioritised for further specific design guidance, and what should that guidance cover? (refer also to the individual reports and key questions for each conservation area)

Town Centre Strategy

5.43 In addition to the above measures, further management arrangements are recommended in some areas. This includes for example, the development of a comprehensive Town Centre Strategy within Ealing Town Centre to help coordinate the preservation and enhancement of the Town Centre, whilst meeting growth needs. A Town Centre Strategy would consider how best to take forward the various development opportunity sites identified in the Town Centre, with a focus on regeneration within an historic context. This will help to:



- Set out the requirements for **key opportunity development sites** with the Town Centre, and crucially help co-ordinate and facilitate their delivery within the context of the surrounding environment and infrastructure.
- Provide a framework to enable the highest level of architectural and design responses to sites. This will help allay concerns expressed in the past on some sites by Historic England and others, for example in relation to development proposals for 9-42 The Broadway where the potential loss of historic fabric and level of potential harm were identified as issues, together with sensitivities around the Haven Green CA. The framework should help engender a heritage-led (or heritage-inspired) regeneration of the Town Centre.
- Support the role of the established Design Review Panels (DRP) and Community
 Review Panel (CRP) to assist with the development of major sites within the Town
 Centre to help scrutinise and improve the quality of design, particularly in its
 response and integration with the historic character and heritage assets within the
 Town Centre.
- Ensure future redevelopment of the Broadway Shopping Centre is of the highest design quality to help it link with the commercial core and surrounding residential

- area. It should also help to improve pedestrian permeability and better reflect the original tight urban grain of Ealing, during the Victorian/Edwardian period. Providing a diversity of uses (retail/leisure/food and drink/offices) will also improve and update its offer in future and help it integrate with the rest of the Town Centre.
- Look specifically at the western gateway to the Ealing Town Centre CA- the
 redevelopment of Perceval House, the Town Hall extension and the development of
 the Cinema site has the potential to create a new community/commercial/leisure
 hub that positively embraces the historic assets in the area to add value in both
 economic and cultural terms.
- Explore further the relationship of the **office corridor**, to the east of the Town Centre, with the CA. Whist it is not proposed to extend the CA into this area, the preparation of design parameters for this area would help ensure that development would respect the **western gateway** of the Town Centre and views into the CA.
- Look at **public realm** improvement opportunities, for example through the potential for the backland site at Sandringham Mews to link through to the new Victoria plaza by Dickens Yard/ Church of Christ the Saviour.
- Make a strong business case for external grant-funding for heritage enhancement schemes from Historic England, Heritage Lottery and other providers. This could take the form of direct improvements to the historic fabric and environment of the Town Centre and/or be used to supplement repair/enhancement works in the form of grants to local buildings owners, particularly shopowners in the case of shopfronts and signage and other works. Match- funding could come from other regeneration initiatives, section 106 monies, and other sources.
- Enable town centres to respond effectively to changing patterns of behaviour as a result of the recent Covid-19 pandemic, and explore ways that heritage and culture can help foster the vitality of viability of the centres. This could include building on past initiatives such as the Heritage Quarter (block formed by Bond Street and High Street in the north west, through Ealing Green, Pitzhanger Manor and Walpole Park, Ealing Studios and Lammas Park). It could also help provide opportunities to work with other partners including the Questors Theatre, Ealing Arts and Leisure, education providers (Thames Valley University and Hammersmith and West London College), Ealing Studios and the retail sector, on a range of new initiatives.
- Link in, and respond to, the emerging spatial strategy of the Local Plan and other economic and regeneration initiatives for Ealing's town centres and high streets.
- **5.44** There needs to be a similar comprehensive long-term strategy to address visual improvements to the townscape in **Acton Town Centre** and especially the creation of active frontages and improved pedestrian linkages to link the town square and High Street with Steyne Road, potentially through the redevelopment of key redevelopment site opportunities/allocations in this area. Future redevelopment of sites such as the Morrisons site (existing Local Plan allocated site) will be instrumental in achieving improvements to the Western Gateway area.

Question 10: Do you agree with the town centre strategy approach outlined above?

Article 4 Directions

5.45 Ealing currently has the following Article 4 Directions in operation:

- Bedford Park (1985 & 2008)
- Brentham Garden Estate (1976 & 2007)
- Half Acre Rd, Churchfields (1996)
- Hanger Hill Garden Estate (2002)
- Hanger Hill Haymills Estate (1997)
- The Grove, Ealing Town Centre (2013)
- Chapel and West Lodge St Bernard's Hospital (1985)
- Listed Buildings in Ealing Borough (1984).



5.46 All of the above affect conservation areas, with the exception of the Chapel and West Lodge at St Bernard's Hospital which fall just outside St Marks Church and Canal CA.

5.47 A recent survey of London Boroughs (**Appendix 3**) shows that Article 4 Directions support the majority of designated conservation areas, although their coverage varies on a borough by borough basis, in terms of the development class and geographical area, covered. Some have blanket directions covering entire CAs, typically including new windows and doors, extensions, porches, changes to the front elevations, materials and roofs, and the creation of vehicular hardstandings.

5.48 National policy dictates that it is only appropriate to remove permitted development rights where there is a real and specific threat and to exclude properties where there is no need for the direction to apply. An Article 4 Direction helps ensure that certain types of development are brought back under the control of the Council, so that potentially harmful proposals can be considered through planning applications. However, this does not mean that the Council will automatically refuse permission; applications would still have to be considered on a case-by-case basis, and an assessment made of the harm that they would cause.

5.49 In some cases, the decision as to whether to introduce an Article 4 Direction into an area is not straightforward. This is particularly the case where unregulated alterations in the past have had such a negative impact on an area that introducing a Direction now would make little difference in improving the area. A judgement call needs to be made as to how close a particular area is to the 'tipping point' in this regard.

5.50 Alternatives to introducing Article 4 Directions should also be considered. The strategic review recommends the introduction of better design guidance and this could provide an improved framework for householders to work with in terms of defining what is acceptable and what is not within a CA. There may be scope for CAAPs to work more closely with the Council to help achieve this. Additional enforcement of existing rules could also assist.

5.51 However, the use of tools such as Article 4 Directions, does significantly strengthens the ability of councils to control all types of development, especially those resulting in smaller scale incremental changes, that cannot be controlled through CA designation alone. There is therefore an argument that all CAs should benefit from Article 4 Directions covering

the changes that most commonly negatively impact CAs including controls over new windows and doors, extensions, dormer windows and rooflights, hardstandings and changes to boundary treatments (i.e. a 'blanket' approach). Some CAs in Ealing already have Directions in place to cover these matters, but the majority do not.

5.52 As part of the strategic review a more 'targeted' approach has been employed. Using evidence gathered, recommendations are made as part of the assessment of each CA as to whether they would benefit from a Direction, together with the priority areas that such a Direction should cover. For each area, a class and type of development that should be controlled is specified, along with the geographical area that is should cover. This approach is consistent with recent planning advice provided to local planning authorities that blanket geographical coverage for Article 4 Directions in general is unlikely to be supported by the Secretary of State.

5.53 New/Amended Article 4 Directions are recommended at:

- Acton Green- consider new Article 4 to cover windows and doors across the CA.
- Acton Town consider new Article 4 to cover control changes of use from office to residential in the commercial part of the TC. This is being looked as part of a separate Borough-wide review.
- **Brentham Garden Estate** consider additional control in relation to 'backlands', specifically in relation to the removal of PD rights for the erection of all gates within twittens (alleyways/paths) and larger garden buildings.
- **Brunswick** consider new Article 4 to cover roof extensions, dormers and rooflights and creation of hardstandings and boundary treatment across CA.
- **Churchfields** consider whether the existing Article 4 Direction in the western section of Half Acre Road should be widened in scope to include the control of outbuildings and enclosures including decking and jetties and rear boundaries to minimise impact on the surrounding parkland/Brunel Viaduct.
- **Creffield-** consider new Article 4 to cover boundaries and hardstandings, alterations to roofs including rooflights, and replacement windows and doors across CA.
- Cuckoo Estate- consider new Article 4 to cover roof enlargements/alterations, porches, hard surfaces and chimneys. To apply only to proposed reduced CA boundaries covering central spine of Cuckoo Avenue, Hanwell Community Centre and Cuckoo Park.
- Ealing Common- consider new Article 4 to cover boundary treatments, particularly where these front, and disrupt, The Common and replacement windows across the CA
- **Ealing Cricket Ground** consider new Article 4 to cover windows and doors, front gardens, hardstandings and boundary treatments, and outbuildings across the CA.
- Ealing Town Centre- consider new Article 4 to cover control changes of use from office to residential in the commercial part of the TC. This is being looked as part of a separate Borough-wide review. Within the residential enclave, consider new Article 4 to cover the loss of front yards/walls and creation of hardstandings across the CA area.
- **Hanger Hill Haymills** consider extending existing Article 4 to cover front wall, gates and railings across the CA.

- Hanwell Cemeteries- consider a new Article 4 covering the residential properties immediately surrounding both the Kensington & Chelsea and Westminster cemeteries. To cover roof extensions and alterations and outbuildings and enclosures in selected areas on the boundaries of the CA.
- **Haven Green** consider a new Article 4 covering hardstandings and loss of boundary walls and rooflights on front elevations and overpainting, across the CA.
- **Mill Hill Park** consider a new Article 4 covering windows and roof alterations across the CA.
- **Montpelier** consider a new Article 4 covering loss of front gardens, boundary treatment, rooflights and loss of timber/metal windows across the CA.
- Mount Park- consider a new Article 4 covering hardstandings and loss of front boundaries and rooflights on front elevations across the CA.
- Norwood Green- consider a new comprehensive Article 4 covering windows and doors, roof alterations, porches, hardstandings, front boundaries and painting across the CA.
- St Marks and Canal- consider a new Article 4 covering hardstandings and loss of boundary walls, rooflights and replacement windows and doors particularly in Green Lane and Lower Boston Road. A further Direction should also be considered to control the rear outbuildings in all houses backing onto the canal including Tentelow Lane.
- **St Stephens** consider a new Article 4 covering hardstandings and loss of front boundaries and rooflights on front elevations across the CA.
- **5.54 The case for other new directions** was also considered in each CA. Details of these are set out in the individual Addendum Update Reports, but it was not considered that there was sufficient justification for these to be introduced at the present time, compared to the most pressing priority areas listed above. However, these should be kept under review.
- **5.55** Within some CAs, more than one Article 4 Direction is in place (for e.g. Brentham, Bedford Park), with earlier ones dating back quite some time. To avoid confusion and enable ease of application, it is recommended that where more than one Article 4 is in place, consideration be given to updating historic Article 4 Directions and where practicable and possible, that they be consolidated into a single direction, with appropriate guidance notes for their operation.
- **5.56** It is recommended that the introduction of any new Article 4 Direction goes hand-in-hand with the preparation of **design guidance** to set out what will be acceptable in design terms at the point an application is made to the Council, and strict **enforcement** of current rules that apply to CAs.
- **5.57** The designation of new Directions will have resource implications for the Council. Procedures to make new Article 4 Directions will necessitate formal advertisement and consultation with property owners. The generation of new applications could also have resource implications in terms of staffing resources, however this could be offset at least in part by the fact that local planning authorities can now charge fees on applications in relation to Article 4 Directions (2012 Fees Regulations, as amended).

- Question 11: Do you agree with the introduction of Article 4 Directions in principle?
- Question 12: Do you agree with the specific Article 4 Direction recommendations for each CA? (refer also to the individual reports and key questions for each conservation area)

Design and Other Guidance

5.58 National planning policy encourages local planning authorities to develop policies that will guide the design of new development. These should be based on an understanding and evaluation of the area's defining characteristics (such as that developed through a conservation area appraisal) and should aim to ensure, among other objectives, that developments 'are sympathetic to local character and history, including the surrounding built environment and landscape setting' (NPPF). Plans to reform the planning system as set out in the Planning White Paper (2020) also place greater emphasis on the use of design guides and design codes as part of the development process.

5.59 Historic England ^{1.} suggests that guidance can be developed from CA Appraisals and might cover one or more of the following:

- Controls, limitations and opportunities for enhancement including local plan policies
- Specific issues such as the design of replacement boundary features, windows and doors, or advice on repairing and overhauling existing joinery
- Parameters for extensions
- Design of shop fronts including the use of security shutters
- Outdoor advertisements
- New technology, including satellite dishes, solar panels, small wind turbines and other energy efficient installations
- Storage of bins and bicycles
- Choice of tree species for replacement planting.

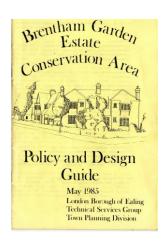
5.60 Site-specific design guidance and development briefs can also encourage new development that complements the established grain, density, settlement pattern and character, while making a positive contribution to the significance of the CA.

5.61 The Council has previously prepared guidance in the form of Supplementary Planning Documents (SPDs) that are relevant to CAs. This includes **SPD4 Residential Extensions** which includes a section and generic guidance on development within CAs. However, this is one of several SPDs retained as 'interim guidance' pending publications of replacement SPDs.

5.62 A **Shopfront Design Guide** for the Borough is also referred to in several of the current CA appraisals. Various iterations of this document have been prepared in the past but it

does not appear to have been finalised. It is recommended that this guidance is resurrected in some form.

- **5.63** The **Generic Management Plan** makes reference to both the existing Residential Extensions and Shopfront SPDs. The core design principles of these documents have been retained and refined in line with other guidance and best practice. Further specific design guidance will be included in the specific design guidance for each CA, where needed.
- **5.64** As set out earlier, a few of the existing management plans are accompanied by useful, but dated, **Design Guides** (i.e. Brentham, Hanger Hill Haymills, Hanger Hill Garden Estate, Half Acre Road) but many plans lack any specific guidance, particularly around architectural elements and features, that could be developed for each area from their unique character and issues that affect them. As part of the strategic review, further design guidance is being developed further as part of the **Specific Design Guides** for each CA.



- **5.65** Opportunities to work across boundaries on design guidance, are also being explored in relation to Bedford Park CA, which falls within the administrative boundaries of both Ealing and Hounslow Boroughs.
- **5.66** The new **Generic Management Plan** provides a range of guidance on design and other matters. It expands upon and updates matters addressed in previous plans and includes **Core Principles for Conservation and Enhancement** on the following themes:
 - Alterations and extensions to roofs and covering materials
 - Dormer windows
 - Roof extensions
 - Rooflights
 - Tiles
 - Chimneys
 - Windows and Doors
 - Brickwork and roughcast render
 - Front, side and rear plots and hardstandings
 - Boundary Treatment
 - Open Spaces
 - Extensions
 - Porches
 - Outbuildings and garages
 - Urban Density
 - Shopfronts and Signage
 - Satellite dishes and telecommunications
 - Public Realm

- Trees and Landscaping
- Materials.

5.67 The new Generic Management Plan also provides guidance on matters not specifically addressed in the past and covers more recent issues and considerations that are perhaps more relevant now in CAs than in the past. These include:

- Renewable energy and micro-generation
- Electrical Charging Points
- Conservatories
- Residential conversions
- Security cameras
- Alarm boxes
- Security lights and floodlighting
- Gas and electric meters
- Air conditioning units
- Basements
- Estate Agent Boards
- Information on Specialist Heritage contractors.

Proactive and Co-ordinated approach

5.68 As well as through the planning system it may be possible to enhance CAs and repair historic assets through other measures including grant-aid and coordination of activities. Grantaid is available from Historic England (repair grants and Partnership Schemes in CAs) and Heritage Lottery Funding (Townscape Heritage Programme). Whilst Pitzhanger Manor recently benefitted from Heritage Lottery Funding (£4.42 million) as part of its restoration, there has been little other grant-aid of this nature benefiting other parts of the Borough.



5.69 Relatively modest levels of grant-aid to improve historic assets such as shopfronts can often make a significant difference to the enhancement of an area and can often go hand in hand with other economic development and regeneration objectives and initiatives. This paper highlights areas that would specifically benefit from such an approach.

5.70 The co-ordination of other enhancement and enforcement measures together with wider public realm activities such as highways signage and street furniture, traffic management, tree strategies and conservation management plans can all assist in the management of CAs.

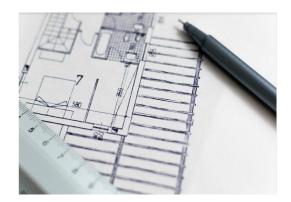
- **5.71** It is recommended that funding, including grant-aid, is investigated further and that partnership bids are co-ordinated to achieve improvements to shopfronts, within the town centres and other shopping parades, as part of the enhancement of CAs.
 - Question 13: Are there any conservation areas, and specific buildings or groups of buildings therein, where you think future investment should be directed in future to preserve and enhance these historic assets?

Resource Implications and the role of Conservation Area Panels in future.

- **5.72** Agreement of recommendations in this report will have some resource implications for the Council. This includes carrying out public consultation on the findings on the strategic review, implementing any agreed changes to the CA boundaries, commissioning any additional expertise on design guidance that may be required, implementing and administering any agreed new Article 4 Directions, preparing comprehensive Town Centre strategies, and seeking of grant funding opportunities and administering relevant schemes. Some of these measures could link into other corporate activities of the Council. Depending on which recommendations are taken forward, further assessment on the financial implications will need to be carried out and assessed as part of the Council's normal budgetary processes.
- **5.73** There is a concern amongst CAAP members that the absence of a dedicated borough conservation officer (since July 2018) has left a gap in resources, advice and expertise on design and heritage matters, and this in turn could make implementing some of the above tasks challenging. There is also some concern that it will not be possible to carry out other on-going duties relating to conservation matters including providing general advice on conservation matters, maintaining the Local Heritage Environment Record (HER) and Local Heritage Register, updating the Heritage at Risk Register, overseeing the administration of CAAPs and on-going monitoring of heritage assets generally, as effectively as they have been in the past.
- **5.74** However, the Council is adapting for the future by developing the heritage skills set of existing planning staff and seeking more innovative ways to share the conservation advisor role. This could potentially include working with the CAAPs, and exploring how their roles can be adapted. This could include further joint working between the Council and panel members and sharing in training initiatives (see below).
- **5.75** The provision of tighter and clearer management plans as part of the strategic review will help officers deal with smaller development schemes more efficiently; and in the case of the larger/more complex referable schemes, advice will continue to be provided by Historic England and the GLA. The Council will continue to call upon external and specialised heritage advice as and when necessary.

The planning system and process

5.76 As part of the consultation with CAAPs, an issue that came up frequently was the planning system, including the role of planning officers and interaction of CAAP members with the Council generally. Panel members felt that the relationship with officers was generally good, but this varied by area. Their main concerns about planning generally include:



- The extent on occasions to which Panel Members' representations are taken into account, or even acknowledged (including comments on planning applications and reported enforcement matters)
- Some Panel Members are receiving 'overlapping' notifications of planning applications; this is happening where CA boundaries abut each other, notably between Ealing TC, Ealing Green and Ealing Common, but also in relation to CAAPs overlapping with Residents Association areas notably in the Hanwell area
- The weight attached to planning 'precedent' and how this is used to justify nonconforming elements, including by Planning Inspectors
- A perceived wide variation in knowledge of heritage and conservation amongst the planning officers and the high turnover of staff that can lead to 'inconsistences' in decision-making; continued professional development is suggested for officers
- A designated planning officer for a particular CA would be helpful, so that they get to know the area well and be the first point of contact for any issues- this was commonplace in the past
- The need to improve the planning process and systems, including validation check lists and consultation together with on-line information and processes; for example, CA Panels felt that they are not always being notified by the Council of changes to plans and there is difficulty in using the website because of unhelpful labelling of documents
- Applicants submit plans which are lacking in detail leading to lack of clarity of impact of proposals on the ground; this includes not always including full details such as through heritage statements
- The true intention of alterations is not always declared at the outset by the applicant/agent, leading to multiple applications and the need to deal with issues post-application, including through conditions
- There is often a failure to execute projects in accordance with the consent which can lead to enforcement issues

- Some applicants/agents lack knowledge of the CA and submit inappropriate proposals, wasting everyone's time
- Some applications on edge of CAs, but outside CA, are often 'ignored' in terms of their impact on the adjoining CA.

5.77 There is however some acknowledgement by Panel members that improvements are being made to the planning processes; this includes improvements to the on-line planning services through joint-working as part of the Planning User Forum. More recently, the Council's Planning Services have embarked on a project (**IPSI**) engaged with the transformation of ICT, processes and ways of working. This project will help address many of the process and consultation issues highlighted by the CAAP members, particular through the Council's website and digital technologies.

5.78 With regard to CAs, the strategic review highlights that the Council's website Is in need of review and updating when it comes to information on CAs, and heritage assets generally. This should in due course include:

- Uploading the various documents prepared as part of the strategic Rrview (CA Review Addendum Updates, Generic Management Plan, Specific Design Guides) alongside the existing CA Appraisals
- Updating the Local Heritage Register (e.g. local list) and related information on Ealing Maps
- Providing access to more information as part of the wider Historic Environment Record (HER) – this should include links to the wealth of information on heritage assets held by the Local Records Centre and other groups and bodies
- Providing 'self-help' information for CAAPs to enable members (especially new ones)
 to carry out their role more effectively, including training opportunities
- Exploring the use of digital/mobile phone technology/social media to inform and enthuse young people about their local heritage and history.

Review of the CAAPs

5.79 The CAAPs provide a very valuable role in advising on design and development matters within CAs. However there is an acknowledgement that the role of CAAPs needs to be reviewed. The LB Ealing currently has 15 Conservation Area Advisory Panels (CAAPs) covering the 28 CAs. The system of CAAPs was approved by committee in October 1995 and implemented in May 1996. Their terms of reference were updated and approved by Planning Committee in 2005.

5.80 The role of CAAPs were last reviewed in April 2015 as part of the Council's Scrutiny Panel 'Ealing 360 degrees'. It was noted that:

- The role of CAAPS varied across London. At that time, 17 of the 33 LBs had a CAAP and of those, 10 were single committees. Nine boroughs had no specific panel.
- The CAAPS in Ealing varied in their membership and ways of working
- The membership of some CAAPs was very small and that it was proving difficult to attract the right the people with the requisite knowledge

- The contribution by CAAPs was generally valued but there were on occasion a perception that CAAPs could be seen as 'anti-development'
- Some CAAPs areas were also covered by separate residents' associations and the role and remit of the two overlapped
- There were some issues of communications between the Council and the CAAPs
- The administration of appointments to the CAAP was arranged by Council officers
- A wider strategic review of CAs was imminent.

5.81 The scrutiny Panel resolved that:

- The valuable work undertaken by the existing CAAPs be commended by the Panel
- The introduction of new software in November 2015, expected to improve communications between the Planning department and the public, be welcomed by the Panel
- Officers working together with the CAAP members, be asked to take steps to further encourage the public to become involved with the work of the Panels.
- The recommended membership of a CAAP should ideally be a minimum of three members per panel.

5.82 At the **CA Advisory Panel Forum** in February 2019, in light of the loss of a dedicated conservation officer, it was acknowledged that CA Panels should have more of a direct role in assisting the Council in the management of conservation areas. This would enable the sharing of resources and expertise. It was noted that some conservation panels are much better resourced than others and as part of the strategic review it is clear that some panels need some assistance in order for them to have a proper role in the conservation and enhancement of their areas. This is especially so in the Hanwell area where the Hanwell Panel (two people) covers 6 CAs in its area, with most stretches of the Canalside CA not being covered by any Panel at all.

5.83 The Forum identified a number of strands and options to help develop their role:

- Training for all members
- Nominations of new members and volunteers and ways to increase participation
- Developing better relationships between planners and CA Panels- through, for example, regular visits to areas
- Review of CA Advisory Panel members' terms of reference generally
- Setting up of working groups for specific issues/topics.

5.84 In addition, it was considered that Panels could help develop further technical advice for each CA, in a similar way to the 'Log-Book' and Technical Notes produced by the <u>Bedford Park Society</u>. This could include producing technical notes on original materials such as roof tiles including suitable manufactures. It could even extend to maintaining samples of tiles and other materials as part of a repository for each CA.

5.85 It is recommended that the Council and CA Panels continue to work together and explore the above options further and develop workable solutions.

- Question 14- Do you have a view on how the Council can work more closely with heritage partners such as the CA Advisory Panels and other local heritage groups?
- Question 15- Do you have an interest in heritage matters and would you like take part in the activities of your local Advisory Panel? If so, please register your interest with the Council.

6.0 Next Steps and Public Consultation

- **6.1** Initial informal consultation with the CAAPs was carried throughout 2020 and 2021. This included a workshop event held in partnership with Ealing Civic Society in September 2020 and extensive subsequent consultation with the CAAPs through face- to-face meetings and correspondence. In some cases, the panels also took the opportunity to undertake their own informal consultations in their areas over this period, for example with their local residents' associations and representatives.
- **6.2** The issues and recommendations derived from the earlier informal consultation are set out in this report and form part of the public and stakeholder consultation. This consultation is aimed at the wider public, including local residents, businesses, amenity and history groups and societies, as well from national heritage groups and organisations.
- **6.3** The public and stakeholder consultation exercise will enable all the officer recommendations in this report to be fully considered. It will also enable all the suggestions put forward by the CAAPs, including those that are not supported by officers, to be fully aired before a final decision is taken by the Council. It will enable proposed boundary changes to be tested, to consider the alternatives put forward by the CAAPs and to consider proposed extensions where the case is considered 'marginal' by officers. The consultation period will also allow a further opportunity to consult on buildings of local importance and proposals for Article 4 Directions in each area. It will also help identify priorities for future design guidance, which will form part of the final strand of the review process. This will build on the on-going progress of drafting such guidance, between the CAAPs and officers.
- **6.4** If agreed in principle, any changes to conservation area boundaries will also need to go through a formal process as specified under section 70(8) of the Planning (Listed Buildings and Conservation Areas) Act 1990. This requires that in addition to notifying both the Secretary of State and Historic England, a local planning authority is also required to publicise designation of a conservation area by a notice placed in the London Gazette and a local newspaper. The local authority must follow the same publicity procedures to vary or cancel a designation as required to designate and involving the community at an early stage is advisable. A further formal process will also need to be carried out with those directly affected in relation to the introduction of any Article 4 Directions; this will need to comply with the Schedule 3 of the Town and County Planning (General Permitted Development)

(England) Order 2015. This forms part of the statutory consultation that will be undertaken later in 2022, once the Council has agreed in taking forward any final proposals.

6.5 As part of this current round of public and stakeholder consultation, the opportunity will also be taken to proactively promote CAs and make people more aware of their designation and their benefits. It is hoped that this will help encourage new members to join the CAAPs where they are currently underrepresented and under-resourced in some cases. Ways will also be explored by the Council with the CAAPs into how wider public awareness and interest in conservation and heritage issues generally can be raised; this may entail the production of a regular newsletter in future, including through digital formats.

7.0 Conclusion

7.1 Ealing has continued to change and evolve over time, and particularly since the early 1900s when it was referred to as 'Queen of the Suburbs'. It is debatable whether such a description is still directly applicable to Ealing but despite the changes, Ealing remains an identifiable entity particularly in terms of the quality of architecture of its Victorian and Edwardian centres and the scale and coherence of its leafy suburban areas and open spaces.

7.2 The proposals and recommendations in this report seek to help preserve the best of Ealing's heritage assets whilst recognising that CAs cannot be 'preserved in aspic'; they need to continue to adapt and change and respond to the need for growth and development in this part of west London. Whilst CAs should continue to be protected, the potential of new development to offer significant opportunities to enhance and better reveal CAs, should also be fully explored.

We welcome your views as part of this public and stakeholder consultation.

Question 16- Do you have any other comments on the contents of this report and the approach taken on the review of CAs in Ealing?

Please email all comments and responses to the questions posed in this document to: localplan@ealing.gov.uk by the 18th March 2022.

Appendix 1.

EALING CONSERVATION AR	EAS STATUS			
Name	Date Designated	Appraisal	Management Plan	Article 4 Direction
Acton Green W4	1982	Mar-08	Mar-08	
Acton Park W3	1982 (Ext'd 1992, 1997 &2004)	Apr-09	Apr-09	
Acton Town Centre W3	1982 (Ext'd 1994 & 2004)	Apr-09	Apr-09	
Bedford Park	1969 (Ext'd 1994 & 2004)	Sep-07	Sep-07	1970,1985 LB & 2007 (specific properties)
Mill Hill Park	1993	Sep-07	Sep-07	
Brentham Garden Estate W5	1969	Mar-08	01/03/2008 (Policy & Design Guide 1988)	1976
Brunswick W5	2004	Mar-07	Mar-07	
Ealing Cricket Ground	2004	Mar-08	Mar-08	
Ealing Common W5	1982 (Ext'd 2004)	Mar-09	Mar-09	
Ealing Green W5/W13	1969 (Ext'd 1982, 1992 & 2004)	Mar-08	March 2008 (Policy & Design Guide 1988)	
Ealing Town Centre	1994 (Ext'd 2004)	Dec-07	Dec-07	The Grove 2013
Grange and White Ledges	1995	Apr-09	Apr-09	
Creffield	1993 (Ext'd 2004)	Mar-07	Mar-07	
Hangar Hill Garden Estate	1969	Jan-09	March 2009 (Design Guide 2007)	1976
Hanger Hill (Haymills Estate)	1996	Mar-08	March 2008 (Design Guide 1997)	1997
Haven Green	1982 (Ext'd 1993)	Mar-08	Mar-08	
Montpelier Park	1982 (Ext'd 1991,1997 & 2004)	Apr-09	Apr-09	

2004 (Ext'd 2007)			
2004 (LAL U 2007)	Mar-07	Mar-07	
1969 (Ext'd 1974 & 1997)	Mar-09	Mar-09	(Half Acre Rd only) 1996
1995	5 Mar-07	Mar-07	
1989	9 Mar-07	Mar-08	
1982	2 Mar-07	Mar-07	
1974 (Ext'd 1982 & 2004)	Mar-08	Mar-08	
1982 (Ext'd 1991 & 2007)	Mar-07	Mar-07	
1969	9 Mar-07	Mar-08	
1990 (LB H&F) (Ext'd 1994 Ealing)	Mar-07	Mar-07	
1993	3 Mar-08	Mar-08	
1969 (Ext'd 2007)	Mar-07	Mar-07	
1 1	1999 1982 1982 1982 1982 (Ext'd 1982 & 2004) 1982 (Ext'd 1991 & 2007) 1969 1990 (LB H&F) (Ext'd 1994 Ealing)	1995 Mar-07 1989 Mar-07 1982 Mar-07 1974 (Ext'd 1982 & 2004) Mar-08 1982 (Ext'd 1991 & 2007) Mar-07 1969 Mar-07 1969 Mar-07 1990 (LB H&F) (Ext'd 1994 Ealing) Mar-08	1995 Mar-07 Mar-07 1989 Mar-07 Mar-08 1982 Mar-07 Mar-07 .974 (Ext'd 1982 & 2004) Mar-08 .982 (Ext'd 1991 & 2007) Mar-07 1969 Mar-07 Mar-07 .990 (LB H&F) (Ext'd 1994 Mar-07 .ealing) .993 Mar-08 Mar-08 .993 Mar-08

^{1.} Following the creation of the Oak and Park Royal Development Corporation (OPDC) in 2015, its area now encompasses a small section of the Canalside Conservation Area (Sub Area 11: North Acton) and Old Oak Conservation Area, previously within the LB Ealing's administrative area. The OPDC now has responsibility to designate and review CAs within its area. The proposals and recommendations in this report do not apply to these areas.

Appendix 2: Conservation Area Coverage in other parts of London.

Inner London:

Authority	CA Coverage
Camden	40 conservation areas; 50% coverage; Article 4 directions are in place in most areas
Royal Borough of Greenwich:	22 conservation areas, Article 4 directions are in place in 8/22 areas
Hackney	30 conservation areas; 40% coverage; Article 4 directions in place in one area.
Hammersmith and Fulham	44 (+2 OPDC) conservation areas; 50% coverage; Article 4 directions in most areas
Islington	41 conservation areas, 60% coverage; Article 4 directions are in place in most areas
Royal Borough of Kensington and Chelsea	38 conservation areas, 85% coverage; Article 4 directions are in place in many areas
Lambeth	62 conservation areas, 30% coverage; Article 4 directions are in place in a few areas
Lewisham	27 conservation areas, 15% coverage; Article 4 directions are in most areas
Southwark	48 conservation areas; 35% coverage; Article 4 directions are in place in one c.a.
Tower Hamlets	58 (+2 LLDC) conservation areas; 30% coverage; Article 4 directions in half of c.a.
Wandsworth	45 conservation areas; 45% coverage; Article 4 directions are in place in some c.a.
City of Westminster	56 conservation areas; 90% coverage; Article 4 directions are in place in most c.a.
City of London	27 conservation areas; 70% coverage; Article 4 directions are in place in most c.a.

Outer London

Authority	CA Coverage
Barking and Dagenham	4 conservation areas; 5% coverage; Article 4 directions are in place in all the areas
Barnet	17 conservation areas; 30% coverage; Article 4 directions are in place in 10/17 c.a.
Bexley	23 conservation areas; 20% coverage; Article 4 directions are in place in most c.a.
Brent	22 conservation areas; 10% coverage; Article 4 directions are in place in 18/22 c.a.
Bromley	45 conservation areas; 25% coverage; 19/45 Article 4 directions enforced
Croydon	21 conservation areas; 15% coverage; Article 4 directions are in place in several c.a.
Ealing	29 conservation areas; 12% coverage; Article 4 directions are in place in 6 c.a.
Enfield	22 conservation areas; Unclear coverage – no map; Article 4 directions in most c.a.
Haringey	28 conservation areas; 40% coverage; Article 4 directions are in place in most c.a.
Harrow	29 conservation areas; 10% coverage; Article 4 directions are in place in several c.a.
Havering	11 conservation areas; 10% coverage; Article 4 directions are in place in all c.a.
Hillingdon	31 conservation areas; Coverage, maps and article 4 info not found online.

Hounslow	28 conservation areas; 18% coverage; Article 4 directions are in place in some c.a.
Royal Borough of Kingston upon Thames	26 conservation areas; 8% coverage; Article 4 directions are in place in most c.a.
Merton	28 conservation areas; Unknown coverage – no map; Article 4 directions in most c.a.
Newham	9 conservation areas; small coverage (no map); Article 4 directions are in place in 3 areas
Redbridge	16 conservation areas; 10% coverage; Article 4 directions are in place in most areas
Richmond upon Thames:	76 conservation areas; 65% coverage; Article 4 directions are in place in most areas
Sutton	4 conservation areas; Unknown coverage - no map; however, Article 4 directions are in place
Waltham Forest	15 conservation areas; 10% coverage; Article 4 directions are in place in 9 areas

Source: Survey via on-line research (October 2019) - where land area coverage % is not specified on authority websites, these have been estimated.

Appendix 3a – Overall level of planning applications by type across the 28 CAs (2007-2021**)

Cons Area / Application Type	FULL	OUT/ REM/ SCO/SCE/EIA	TPO/ TPC/ PTC	VAR/NMA/COU	LBC/LBD	CAC	нн	CND	CPE/ CPL/ PRA	ADVERT	TELECOMS	ALL TYPES TOTAL (PLUS RANK*)	% of TOTAL Approved (incl. with conditions, No obj, CLU, PD & PRA)
ACTON GREEN	44	0	30	4	2	2	9	8	13	0	2	114 (25)	73 %
ACTON PARK	82	1	92	14	12	0	20	50	30	2	0	303 (20)	76 %
ACTON TOWN CENTRE	340	7	32	95	18	9	6	242	50	76	13	888 (7)	73 %
BEDFORD PARK	356	0	299	11	284	10	81	91	37	2	5	1245 (2)	77 %
BRENTHAM GARDEN ESTATE	365	0	265	20	6	24	110	45	10	0	5	850 (6)	79 %
BRUNSWICK	84	0	48	5	0	3	27	2	7	0	0	176 (23)	71 %
CANALSIDE	53	5	4	35	1	1	8	152	20	8	3	290 (19)	80 %
CHURCHFIELDS	43	0	34	5	9	2	12	27	5	0	1	138 (24)	74 %
CREFFIELD	315	1	280	33	2	8	45	63	26	2	6	781 (3)	80 %
CUCKOO ESTATE	197	2	88	11	3	2	83	34	107	1	3	531 (11)	70 %
EALING COMMON	231	1	271	40	13	3	32	80	19	6	3	726 (9)	79 %
EALING CRICKET GROUND	92	0	144	16	0	1	16	50	10	1	2	340 (18)	81 %
EALING GREEN	403	5	240	101	38	11	45	254	76	65	1	1241 (3)	79 %
EALING TOWN CENTRE	434	6	213	129	20	13	16	342	48	186	6	1413 (1)	77 %
GRANGE & WHITE LEDGES	42	0	151	8	0	0	5	27	3	3	2	242 (22)	74 %
HANGER HILL (HAYMILLS) ESTATE	438	0	205	34	13	10	178	69	20	5	1	973 (4)	67 %
HANGER HILL GARDEN ESTATE	131	0	114	4	1	3	50	16	4	0	8	331 (17)	77 %
HANWELL CEMETERIES	42	0	10	2	0	2	6	2	16	0	0	80 (28)	73 %
HANWELL CLOCK TOWER	56	0	0	14	0	1	0	6	6	10	0	93 (26)	57 %
HANWELL VILLAGE GREEN	107	0	131	11	17	6	36	52	21	0	1	393 (16)	78 %
HAVEN GREEN	181	0	161	23	3	6	35	37	19	16	2	486 (12)	80 %
MILL HILL PARK	151	6	146	36	1	8	23	96	22	3	2	494 (13)	79 %
MONTPELIER PARK	128	0	272	17	4	6	26	47	10	1	7	518 (10)	78 %
MOUNT PARK	280	0	447	40	0	16	43	68	24	1	3	922 (5)	84 %
NORTHOLT VILLAGE GREEN	34	0	12	5	0	1	4	3	18	5	0	83 (27)	63 %
NORWOOD GREEN	186	0	59	6	14	6	47	57	41	3	4	424 (15)	62 %
ST MARKS CHURCH & CANAL	169	5	53	22	30	6	39	92	27	0	1	444 (14)	77 %
ST STEPHENS	73	0	83	5	2	3	14	20	25	0	3	230 (21)	83 %
TOTALS	5057	39	3884	746	493	163	1016	2032	714	396	84	14749	

^{*}Ranked in order with 1 being the highest number of cases recorded and 28 being the lowest.

^{**} Figures relate to calendar years. Figures for 2021 – up to September 2021.

Appendix 3b- Overall level of enforcement cases (2007-2021)

Cons Area / Breach Type	Advert Contravention	Amenity Issue	Breach of Conditions	Change of Use	Constr. Of Det. Res. Dw.	Dem. in	Enquiry	High Hedge	Listed Build. Contr.	Multiple	Not in acc. with	Operational development	Private Legal matter	Tree Contr.	Use of outbuilding as dwelling	Unknown	ALL TYPES TOTAL
ACTON GREEN	1	0	2	1	0	0	3	0	1	1	2	11	0	0	0	5	27
ACTON PARK	9	0	2	5	1	1	9	0	0	0	2	15	0	3	2	2	50
ACTON TOWN CENTRE	6	3	8	42	1	1	14	0	5	0	13	124	0	1	0	19	237
BEDFORD PARK	4	3	5	2	2	0	5	0	29	1	15	68	0	11	0	3	148
BRENTHAM GARDEN ESTATE	3	2	5	2	5	3	5	0	0	0	30	127	0	13	1	4	200
BRUNSWICK	1	0	0	10	0	0	8	0	0	0	9	23	0	8	3	4	66
CANALSIDE	0	0	0	2	0	0	1	0	0	0	0	0	0	0	0	0	3
CHURCHFIELDS	0	1	2	1	0	1	2	0	0	0	1	11	0	7	0	1	27
CREFFIELD	3	1	7	26	1	2	10	0	0	1	16	46	0	16	1	10	140
CUCKOO ESTATE	0	0	2	10	6	0	17	0	0	1	7	57	0	2	5	2	109
EALING COMMON	6	2	7	21	1	1	10	0	2	4	12	45	0	17	1	2	131
EALING CRICKET GROUND	3	3	0	10	1	3	1	1	0	0	4	11	0	10	2	4	53
EALING GREEN	42	4	9	21	1	3	11	0	11	3	17	75	0	13	0	16	226
EALING TOWN CENTRE	30	2	17	37	0	2	18	0	2	0	12	64	0	9	0	12	205
GRANGE & WHITE LEDGES	0	0	0	4	0	0	1	0	0	0	2	11	0	4	0	0	22
HANGER HILL (HAYMILLS) ESTATE	10	2	13	17	10	5	21	2	1	2	25	206	0	16	5	14	349
HANGER HILL GARDEN ESTATE	9	1	3	2	0	0	6	0	0	2	3	81	0	3	1	4	115
HANWELL CEMETERIES	0	0	0	0	0	1	0	0	0	0	0	1	0	0	0	0	2
HANWELL CLOCK TOWER	3	0	10	13	0	0	2	0	0	1	0	5	0	0	0	2	36
HANWELL VILLAGE GREEN	2	5	0	8	0	0	5	0	0	1	7	26	0	9	0	4	68
HAVEN GREEN	14	1	4	15	0	6	5	0	2	1	11	50	0	6	1	13	129
MILL HILL PARK	5	0	8	14	3	1	7	0	0	0	13	50	1	16	5	10	133
MONTPELIER PARK	3	0	15	5	1	2	4	0	2	0	6	22	0	16	1	3	80
MOUNT PARK	19	2	8	17	2	1	11	0	1	2	19	41	0	20	1	6	150
NORTHOLT VILLAGE GREEN	1	0	0	0	1	0	2	0	0	0	0	6	0	1	0	1	12
NORWOOD GREEN	5	0	10	13	2	3	2	1	0	1	7	41	0	15	3	11	114
ST MARKS CHURCH & CANAL	20	3	5	6	0	1	8	0	0	0	6	20	0	5	2	22	98
ST STEPHENS	2	1	0	3	1	1	6	0	0	2	3	17	0	5	1	4	46
TOTALS	201	36	142	307	39	38	194	4	56	23	242	1254	1	226	35	178	2976

KEY:

Application types:

ADVERT: Advertisement Consent

TEL: Telecommunications Notification

CND: Discharge of Conditions

CPE/CPL/PRA: Certificate of proposed/ Lawful use/ Prior Approval

FULL: Full Planning Permission

SCO/EIA/RMS: Scoping Opinion/ EIA Application/ Reserved Matters

HH: Householder Planning Permission
LBC/LBD: Listed Building Consent/ Demolition

CAC: Conservation Area Consent

VAR/NMA/COU: Variation/ Non-Material Amendment/ Change of Use

TPO/TPC/PTC: Works to a tree/ Tree Preservation Order

Decision types:

PD/PA: Prior Approval/ Permitted Development/ Deemed Consent

Enforcement breaches:

Advert Cont.: Advert Contravention

Breach of Cs.: Breach of Conditions

Constr. Det. Dw.: Construction of detached residential dwelling

Dem. In CA: Demolition in Conservation Area Listed B. Contr.: Listed Building Contravention

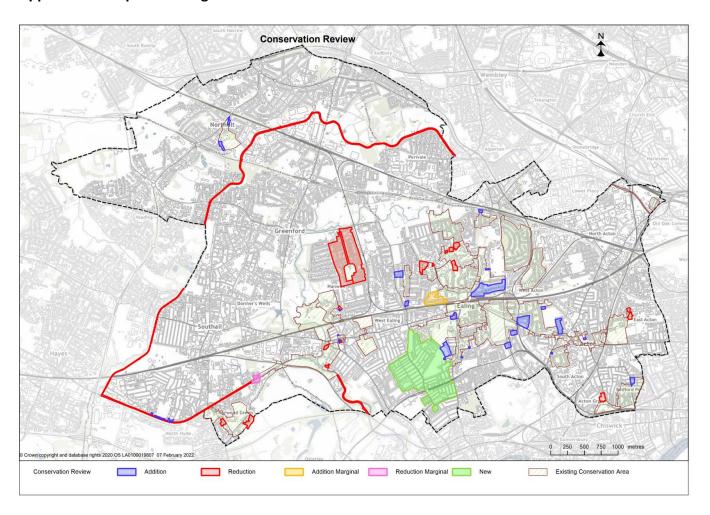
Not in acc. w/p: Not in accordance with planning permission

Op. Dev.: Operational Development

Use anc. out.: Use of Ancillary outbuilding as separate dwelling

Tree Cont.: Tree Contravention

Appendix 4- Proposed changes to boundaries of CAs



NB. A small section of the Canals Conservation Area (Sub Area 11: North Acton) and Old Oak Conservation Area which were previously within the LB Ealing's administrative area now fall within the Old Oak and Park Royal Development Corporation (OPDC) area and responsibility. The proposals and recommendations in this report do not apply to these areas. NB. The proposals shown on this overall map reflect officer recommendations; all other boundary changes considered in the review are set out in detail in the Individual reports and key questions documents for each area.