



Historic England

Examination of Ealing Local Plan

Matter 1, Issue 1: Procedural and Legal Requirements

Questions 11 and 23-25

Historic England, Hearing Statement

May 2025

Historic England is the principal Government adviser on the historic environment, advising it on planning and listed building consent applications, appeals and other matters generally affecting the historic environment. Historic England is consulted on Local Development Plans under the provisions of the duty to co-operate and provides advice to ensure that legislation and national policy in the National Planning Policy Framework are thereby reflected in local planning policy and practice.

The tests of soundness require that Local Development Plans should be positively prepared, justified, effective and consistent with national policy. Historic England's representations on the Publication Draft Local Plan are made in the context of the requirements of the National Planning Policy Framework ("the Framework") in relation to the historic environment as a component of sustainable development.

Historic England Hearing Statement

1. Introduction

- 1.1. This statement addresses the Inspector's questions with regards Matter 1 of the Local Plan.
- 1.2. This hearing statement should be read alongside Historic England's comments submitted at previous consultation stages of the Local Plan.
- 1.3. All National Planning Policy Framework (NPPF) references are to the December 2023 version.

2. Matters and Issues for Ealing Local Plan

Matter 1, Issue 1: Procedural and Legal Requirements

Integrated Impact Assessment

Q.11. Is the IIA robust in terms of the assessment of the likely effects of the submitted policies and allocations, scoring against the Framework objectives, consideration of reasonable alternatives and explanation of why the preferred Spatial Strategy and policies were selected?

- 2.1. At Regulation 19, Historic England raised a concern that the evidence base did not include heritage impact assessments (HIAs), which would inform the Local Plan site allocations. HIAs would also therefore supplement the Integrated Impact Assessment (IIA), which at present includes limited consideration of heritage assets in terms of their 'significance' and impacts upon it. In subsequent discussions with Historic England, the Council has agreed to undertake HIAs for select site allocations, and to complete an HIA screening exercise to determine whether there may be the potential for effects to the Royal Botanic Gardens Kew World Heritage Site. We hope to have the opportunity to review the findings of these assessments prior to the stage 2 Examination Hearings in order to understand their implications for the Local Plan (particularly the site allocations), as well as the IIA.

General conformity with the London Plan/ London Plan consistency

Q23. Overall, is the Plan in general conformity with the London Plan and how is that evidenced? Are any modifications necessary to address any inconformity?

- 2.2. Historic England have concerns with the conformity of Tall Building policy D9, particularly criteria H. We would welcome clarification on the intention of D9.H as we understand it to mean that, subject to agreed masterplans and impact assessment, tall buildings are acceptable on all Designated Industrial Locations (otherwise referred to throughout the plan as 'Strategic Industrial Locations' (SIL)). If this is the policy intention, we would query whether it conforms with London Plan policy D9.B2/ para. 3.9.2, which requires appropriate/maximum building heights to be given, and D9.B3, which states 'tall buildings should only be developed in locations that are identified as suitable in Development Plans.' [emphasis added] Any modifications to address inconformity would need to be justified by the findings of the Tall Building Strategy ([EB45](#)). We would therefore highlight that many of the SILs (mapped as per [S18](#)) are in areas that the Tall Building Strategy ([EB45](#), pp.8-11) and, in turn, the draft plan ([S1](#): Table DMP1 and Figure DMP1) identifies as being unsuitable for tall buildings.

Q24. Is it clear how the individual policies of the Plan relate to the those of the London Plan? Is there any duplication between the policies of the Plan and the London Plan in terms of their content?

- 2.3. We understand that the Ealing Local Plan has been prepared to complement the London Plan and that to avoid unnecessary duplication with the National Planning Policy Framework and London Plan the Council intends to rely on London Plan heritage policies HC1 and HC2. We are concerned that this is not sufficiently clear and that the plan may lack a local robust strategy for heritage.
- 2.4. We are additionally concerned that the Tall Building policy is presented as a continuation of London Plan Policy D9: Tall Buildings (see below response to Q25), and that is not clear how the two plans and their respective Tall Building policies will operate together when the London Plan is revised in future.
- 2.5. We have not raised any issues with duplication of the content of policy D9: Tall Buildings.

Q25. Where a policy proposes local variation to a London Plan policy, is modification needed to the policy number/reference to ensure that the variation and the original policy can be distinguished, for clarity and therefore effectiveness? Is the Plan in general conformity with the London Plan 2021?

- 2.6. We are concerned that the Local Plan seeks to extend Tall Building policy D9 of the London Plan with additional criteria. In our opinion, it would be beneficial if all policies in the Local Plan are distinguishable from those in the London Plan and, where this can be achieved through a modification to the policy number/reference, we would be supportive. We also suggest that clarification is provided as to how the Council envisages Local Plan policies would operate once the new London Plan is adopted (likely to be in 2027).
- 2.7. With regards to the plan being in general conformity with the London Plan 2021, please see our response to question 23 above.