



Examination of Ealing Local Plan

Matter 6: Design and Amenity, Tall Buildings and the Historic Environment

Questions 2c, 2e, 2f, 2g, 2i, and 3-7

Regulation 19 Representation No. 760

Historic England, Hearing Statement

July 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 6 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.

Matters and Issues for Ealing Local Plan

Matter 6: Design and Amenity, Tall Buildings and the Historic Environment

Tall Buildings

Q2. In terms of the local variation to Policy D9 of the London Plan:

c. does the character led approach of the Plan to determining building heights strike an appropriate balance with the ‘Good Growth’ and appropriate densification principles of the London Plan?

Local Plan evidence base

- 2.1 In our response to the Regulation 19 consultation version of the plan, Historic England raised concerns about the extent to which potential impacts of tall buildings on views and the significance of heritage assets had been assessed. We also raised a concern that under part H of the policy an allowance is made for tall buildings on industrial sites without identifying those sites on which tall buildings are suitable.
- 2.2 Since the Regulation 19 consultation, the Council has carried out some additional work to screen their tall building sites for potential impacts on the Royal Botanic Gardens at Kew World Heritage Site (WHS). We welcome this and have reviewed the draft outputs and we understand that the document will be published in due course.
- 2.3 The Council has also provided strategic heritage impact assessments for selected sites at our request. These will inform our response to Development Sites in our Hearing Statement for Matter 9.
- 2.4 We remain uncertain as to how the Tall Building Strategy would inform tall buildings under part H and we are not aware of any further work to assess the potential heritage impacts of tall buildings on these sites. This is of concern as development has the potential to result in harm to heritage assets, including highly graded designated assets.

Policies to secure appropriate assessments at planning application stage

- 2.5 The Local Plan indicates at paragraph 5.15 that: “Heights listed in Development Sites are the product of detailed design assessment, nevertheless they remain subject to a full design assessment at the point of application against the impact policies set out in London Plan Policy D9 C”. In addition to this, we understand from the Tall Buildings Strategy Main Report that it is intended that more

detailed assessments will be needed at planning application stage, including in relation to Kew Gardens WHS.

- 2.6 However, neither London Plan Policy D9 Tall buildings, nor London Plan Policy HC1 Heritage conservation and growth, explicitly requires a heritage impact assessment in cases where heritage assets may be affected. At present this matter is covered by Ealing's adopted Local Policy for Heritage 7CA(a) which requires development of heritage assets and their settings to "be based on an analysis of their significance and the impact of proposals upon that significance".
- 2.7 This issue is compounded by the lack of an overarching heritage policy within the emerging Ealing Local Plan. While it has not been possible to reach full agreement on this matter with the Council, we have proposed changes to Strategic Policy SP4.1 and supporting text from paragraph 3.45 to secure adequate consideration of heritage. These are set out in our response to question 7 below and we will continue to discuss this with Ealing Council through the process of preparing a Statement of Common Ground.
- 2.8 To help address the lack of a strategic steer for suitability for tall buildings and appropriate heights on industrial sites, we request clarification and strengthening of Policy D9 part H as follows:

"H. Tall buildings may be appropriate on some designated industrial sites will be subject to agreed masterplans, and based upon informed by robust assessment of local impacts and sensitivity that seeks to avoid and minimise harm."

- 2.9 In addition, and for tall buildings more generally, the following modification to paragraph 5.15 of supporting text to Policy D9 is requested:

"...Heights listed in Development Sites are the product of detailed design assessment, nevertheless they remain subject to a full design assessment at the point of application against the impact policies set out in London Plan Policy D9 C. Applications should therefore include Landscape/Townscape and Visual Impact Assessment and Heritage Impact Assessment following appropriate guidance."

- 2.10 We will continue to discuss these requested modifications through the process of preparing a Statement of Common Ground with Ealing Council.

e. do criterion E, Table DMP1 and Figure DMP1 provide sufficient clarity on what is meant by a 'tall building' in an Ealing context for each of the Town Plan areas.

- 2.11 Historic England considers that the definition of a tall building in the Regulation 19 consultation version of the plan lacks clarity in several ways. We have discussed this matter with the Council and the comments below will be reflected in our Statement of Common Ground.

Tall buildings in relation to defined thresholds (Policy D9 Part F)

2.12 In our response to the Regulation 19 consultation version of the plan, we misunderstood Part F of the policy as referring to a maximum threshold rather than a minimum threshold. We consider that Part F requires clarification so that the meaning is unambiguous. We suggest the following revised wording:

‘F. Tall buildings are those above defined thresholds heights and are exceptional. Tall buildings should only be located upon specified Development Sites defined in the Development Plan.’

Definition of a tall building in Table DMP1

2.13 In addition to this, we raised concerns about a number of the tall building thresholds reported in Table DMP1. We understand that this was a result of transcription errors and that the Council intends to amend Table DMP1 as follows. Any references to these thresholds in associated site allocation policies or supporting text should be amended accordingly.

Town: Acton / Area: A2 / Tall Building(m): ~~49~~ **21** / Storeys: ~~44~~ **6**

Town: Acton / Area: A4 / Tall Building(m): ~~49~~ **21** / Storeys: ~~44~~ **6**

Town: Ealing / Area: E14 / Tall Building(m): ~~73.5~~ **31.5** / Storeys: ~~24~~ **9**

Town: Southall / Area: S6 / Tall Building(m): ~~24.5~~ **21** / Storeys: ~~7~~ **6**

f. is the local approach to defining the parameters for tall buildings across the Borough consistent with evidence base documents EB42, EB44, EB45, EB45A, EB45B, EB46, EB47 and EB48?

2.14 Please see our responses to questions 2c and 2e above.

g. are the Council’s suggested modifications [S24] for the design principles of specific allocations throughout the Plan to refer to ‘up to’ a given number of storeys needed for the allocations to be justified by evidence, effective and therefore sound?

2.15 London Plan Policy D9 requires boroughs to identify any tall building locations and appropriate tall building heights on maps in Development Plans. The supporting text (3.9.2) states that in these locations, boroughs should determine the maximum building heights that could be acceptable. Historic England would therefore welcome use of the wording ‘up to’ in Ealing Local Plan policies provided these are in accordance with strategic evidence. As discussed in our response to question 2, heights should be subject to detailed impact assessment at planning application stage.

i. are any modifications needed to the variation to Policy D9 for soundness?

2.16 As outlined above, we welcome the Council's commitment to correct typographic errors in Table DMP1. These should be accompanied by any necessary corrections to the site allocation policies and supporting text.

2.17 We request clarification and strengthening of Policy D9 part H as follows:

"H. Tall buildings ~~may be appropriate~~ on ~~some~~ designated industrial sites ~~will be~~ subject to agreed masterplans, ~~and based upon~~ informed by the Ealing Tall Building Strategy and robust assessment of local impacts and sensitivity that seeks to avoid and minimise harm."

2.18 We request modification to paragraph 5.15 of supporting text as follows:

"...Heights listed in Development Sites are the product of detailed design assessment, nevertheless they remain subject to a full design assessment at the point of application against the impact policies set out in London Plan Policy D9 C. Applications should therefore include Landscape/Townscape and Visual Impact Assessment and Heritage Impact Assessment following appropriate guidance."

2.19 Related modifications for the historic environment are set out in our response to question 7 below. Any comments in relation to individual Development Sites will be provided in our Hearing Statement for Matter 9.

Historic Environment

Q.3 Does the Plan set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats?

3.1 Historic England remains concerned by the lack of a borough wide heritage policy for the reasons contained in our response to the Regulation 19 consultation on the plan, along with our response to question 2 above. While it has not been possible to reach agreement about this with the Council, we nevertheless continue to seek common ground on how to improve the soundness of the plan.

3.2 We are therefore requesting modifications to Policy SP4.1 Good Growth, part E, and associated supporting text from paragraph 3.45. These are set out in full in our response to question 7 below.

Q4. Does the proposed scope of the Plan appropriately supplement the heritage policies of London Plan in a manner that addresses any other local heritage issues?

4.1 Please see our response to question 3 and proposed modifications in response to question 7.

4.2 Where we have comments on individual Development Sites these are provided in our Hearing Statements for Matters 9.

Q5. Are the heritage assets potentially affected by the planned growth in the Plan clearly identified? Have potential effects been assessed and reported upon in a clear and consistent way, with an effective understanding of significance? Does this include consideration of any effects on setting? Have Historic England raised any objection to the Plan and, if so, how have concerns been responded to?

5.1 As we have outlined in our response to question 2, in response to concerns raised by Historic England the Council has carried out additional work in the form of a screening for effects to the Royal Botanic Gardens at Kew World Heritage Site and heritage impact assessments for selected sites. We have reviewed these draft documents which will inform our response to proposals for Development Sites and to the general soundness of the Tall Buildings policy.

Q6. Will sites of potential archaeological interest be effectively addressed by the Plan?

6.1 To ensure that sites of potential archaeological interest are effectively addressed by the plan, we are requesting modifications to Strategic Policy SP4.1 Part E and supporting text from paragraph 3.45. Please see our response to question 7 below.

Q7. Are any main modifications necessary for soundness?

Requested modifications to Policy SP4.1 Good Growth part E:

SP4.1 Good Growth, environment and heritage ...

E. Taking a strategic approach to the preservation and enhancement of Ealing's historic environment ~~built heritage~~, including the capacity for heritage-led regeneration and development where appropriate.

- (i) determining applications in accordance with national, strategic and local planning policies for heritage,
- (ii) supporting proposals that conserve, enhance and better reveal the significance of heritage assets,
- (iii) requiring relevant planning applications to be informed by a heritage impact assessment,
- (iv) actively pursuing sensitive schemes to remove assets from the Heritage at Risk Register.

Requested modification to paragraph 3.45 (replacing 2024 proposed modifications SMM24 and SMM26):

3.45 Good Growth is about uniting the various elements of development need with what is valuable about the existing built and natural environment, particularly in light of the three core themes of the Local Plan. Land is a scarce and increasingly expensive commodity so making optimal use of land and buildings and ensuring good design in any new development are at the heart of how we enhance our borough. Ealing has a wealth of designated

heritage assets including over 300 buildings and structures covered by statutory listing. This includes six scheduled monuments and four registered parks and gardens, as well as 29 conservation areas. Of these designated assets, nine listed buildings, five conservation areas, and two scheduled monuments are on the Heritage at Risk Register. In addition, Ealing also has over 700 non-designated heritage assets identified in Ealing's local heritage register and a rich archaeological heritage indicated via Archaeological Priority Areas (APAs). These APAs will be updated to reflect the new London-wide sensitivity tiering, in which Tier 1 APAs identify non-designated archaeological assets of potential national importance that would be subject to the same policies as designated assets.

3.46 Places evolve and change over time. New development has the potential to offer significant opportunities to enhance and better reveal the significance of heritage assets and, as well as to realise their environmental, cultural, and economic benefits of these assets. This will be achieved by placing an understanding of context, including heritage, at the heart of placemaking, Good Growth and good design in line with the design-led approach.

3.47. To ensure that development proposals avoid and minimise harm to the historic environment, they should be informed and shaped by an understanding of the significance of heritage assets, including any contribution made by setting. To demonstrate this, Heritage Impact Assessments will be required for applications with the potential to affect heritage assets. These should be prepared in line with relevant historic environment guidance. If there is the potential to affect the Outstanding Universal Value of the Royal Botanic Gardens at Kew World Heritage Site, assessments should be in accordance with UNESCO's guidance and toolkit for impact assessment. To understand the significance of heritage assets applicants should consult the Greater London Historic Environment Record and draw on conservation area character appraisals and management plans, etc., as appropriate.

3.48 Planning decisions will be in line with statutory duties and policies for heritage contained in the London Plan, national planning policy and the Local Plan. Great weight will be given to conserving the significance of designated heritage assets. Any harm or loss of significance must be justified, and the Council may require this to be offset via a programme of recording, the results of which should be publicly disseminated. The Council will support development that conserves or enhances the significance of designated and non-designated heritage assets, for example by:

- Protecting and reinforcing the character and appearance of conservation areas, retaining or reinstating their positive features.
- Addressing issues that have led to assets being placed on the Heritage at Risk Register and, where appropriate, providing a sustainable future for them via sensitive repair and reuse.
- Securing the optimum viable use of a heritage asset in support of its long-term conservation.
- Removing/remodelling fabric or setting features detrimental to an asset's significance, or reinstating lost features that contribute positively; and
- Improving public access and interpretation.

The Council will also support development that delivers wider heritage benefits, especially those which conserve or enhance the historic environment whilst delivering positive climate and nature action. Where appropriate, the council will secure heritage-related public benefits via planning conditions.