



Examination of Ealing Local Plan

Matter 9: Development Sites

Questions 3, 5, 6, 10, 22, 65 and 108

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 to Matter 9 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 9 – Development Sites

2. Town Plan Development Site Allocations – general

Q3. For effectiveness, is it clear how a decision maker should respond to the contextual considerations and design principles for each Development Site and the overarching principles? Is modification needed to clarify policy from guidance?

- 2.1. Historic England considers that the contextual considerations and design principles contain important parameters for development of the sites and should therefore form part of the site allocation policy.

Q5. Is the methodology for determining building heights robust and are the building height limits for each site allocation consistent with it?

- 2.2. We understand that there are transcription errors in some of the site allocation policies, including sites 01EA and 11EA, and these should be corrected.

Q6. Is the methodology for assessing heritage impacts of site allocations robust and is each site allocation consistent with it?

Heritage Impact Assessments

- 2.3. In our Regulation 19 consultation response, Historic England raised concerns over the absence of any supporting Heritage Impact Assessments (HIAs) for the site allocations. To help address this, the Council has undertaken HIAs for six sites - 01EA, 02EA, 03EA, 11EA, 01AC, 01NO - that are particularly sensitive in terms of heritage and tall buildings.
- 2.4. The way in which the assessments identify that harm to the significance of heritage assets can be avoided and minimised has yet to be incorporated into the plan. Below, we set out our suggestions on how the site allocation policies could be modified to ensure that the plan contains a positive strategy for the historic environment. Historic England will continue to work with the Council on addressing the issues raised in relation to site allocations ahead of the examination hearings.

01AC: Acton Gateway (Morrisons)

- 2.5. Our key concerns with this site are the potential for harm to the nearby Grade II Church of St Mary and Acton Town Centre Conservation Area, which is at risk, in part due to inappropriate tall development. To help manage the risk to these assets, we advise that the following modifications are made:

Contextual considerations:

- 'This site is important to the character of Acton Centre. It is surrounded on three sides by Acton Town Centre Conservation Area, which is included on the Heritage at Risk Register. Other heritage assets, including the grade II Church of St Mary, are nearby. The significance of these heritage assets should be conserved and, where appropriate, enhanced and any harm justified. The site is and opposite the tower blocks of council owned Steyne Estate, currently undergoing infill development.

Design Principles:

- 'Ensure the site layout reflects the historic fine-grained character of the town centre.'
- 'Ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy and respond to the sensitivities of the site, in particular the significance of Acton Town Centre Conservation Area and the reasons for its at risk status. Heights are to range between 3 and a maximum of 15 storeys (52.5m) across the site, with taller elements situated to the north fronting Steyne Road and lower buildings located along Rectory Road and the Conservation Area boundaries. Tall elements should also be located to avoid and minimise competition with St Mary's Church, particularly its tower.
- 'Deliver improvements to the quality of the public realm along Steyne Road, King Street and the High Street, to create an enhanced and more welcoming public realm that is heritage-led.

01EA: Broadway Connection and Arcadia Centre

- 2.6. Tall buildings on this site, particularly those up to 21-storeys, have the potential to harm multiple heritage assets. Our main concerns are the potential for harm to the Ealing Town Centre and Haven Green Conservation Areas, which are both on the Heritage at Risk Register, in part due to the threat of inappropriate tall buildings, and of harm to the GII* Church of Christ Our Savior.
- 2.7. While we acknowledge that the eastern half of this site has an existing consent on which includes a 21-storey building, we wish to highlight that Historic England objected to this proposal. The reasons for the objection were that large-scale buildings are not in keeping with the character and appearance of either Ealing Town Centre Conservation Area, or the adjacent Haven Green Conservation Area; that some buildings that contribute positively to Ealing Town Centre Conservation Area would be lost; and, that the architectural dominance of the Church would be seriously diminished. This would result in significant harm, and there would be the potential for greater cumulative harm as a result of development – particularly tall buildings and demolition – on allocations 02EA and 03EA. It is therefore disappointing that the suitability of this site was not considered in Tall Building Strategy (EB45).
- 2.8. We note that the site allocation to some extent reflects this existing planning permission, but it is important that it could also provide a suitable basis upon which a different, more responsive, development proposal may come forward. We therefore propose the following modifications:

Tall Buildings:

- 'The site ~~is~~ may in principle be suitable for a tall building. A consent was granted for . The threshold height for a tall building is up to 21 storeys (73.5 metres) in 2024 but, should an alternative scheme be considered in future, a lesser height to reduce harm to townscape and heritage should be explored.'

Contextual considerations:

- 'The site is essential to the character of the town centre. ~~It is~~ located within Ealing Town Centre Conservation Area and adjacent to Haven Green Conservation Area, both at risk in part because of the threat of tall development. as well as It is also located within an Archaeological Priority Area and there are other heritage assets in the vicinity, including the GII* Church of Our Savior. potentially falling within the setting of several other Conservation Areas depending on the height of development. Development should conserve or enhance the significance of heritage assets by fully understanding and responding to the built character of the area and its heritage.'

Design Principles:

- 'The site may be suitable in principle for a tall building. It has not been subject to detailed analysis in the Tall Buildings Strategy given the extant planning consent on the eastern part of the site, however, development proposals will be subject to a full design, townscape and visual, and heritage analysis. This analysis should recognise that there is an opportunity to address the 'at risk' status of both Ealing Town Centre and Haven Green Conservation Areas by delivering proposals of scale and massing more in keeping with conservation area. If tall buildings are proposed, they should be sited to minimise harm to the two conservation areas and avoid visually competing with the Grade II* Christ the Saviour Church.
- 'Give particular consideration Proposals should seek to retain and, the retention where necessary, refit or refurbish/retrofit the historic buildings 9/9a, 10, 11, 12, 13, 14, 15-16, 25, 26, 27, 28, 29, and 35 and 36-42 The Broadway, which contribute to the character and ~~context~~ appearance of the town centre and conservation area.'
- 'Particular consideration should be given to retaining and reinstating the historic street grain and pattern within the site, the potential for heritage inspired public realm and the coherent design of shopfronts and signage.'

02EA: Ealing Broadway Shopping Centre

- 2.9.** On this site, tall buildings up to 12-storeys have the potential to harm several heritage assets. Our key concerns are the effect on Ealing Town Centre Conservation Area, which is at risk, and the Grade II* Listed Parish Church of Christ the Saviour. There is also the potential for cumulative harm to these designated assets as a result of development, particularly from tall buildings and demolition on 01EA and 03EA. To help address these concerns we propose the following modifications:

Planning Designations/Site Constraints:

- '...locally listed buildings (on-site and adjacent)...'

Contextual Considerations:

- 'Site is essential to the character of the town centre. It is located within Ealing Town Centre Conservation Area, which is at risk in part due to the threat of inappropriate tall development and includes the locally listed post-modern High Street façade of Ealing Broadway Centre. It is also located within an Archaeological Priority Area and adjacent to Ealing Green Conservation Area with other heritage assets in the vicinity, including the GII* Church of Our Savior. Development should conserve or enhance the significance of these assets by fully understanding and responding to the built character of the area and its heritage.'

Design Principles:

- 'Ensure building height, massing and street layout proposals are developed in accordance with the Tall Buildings Strategy and respond to the sensitivities of the site, in particular the Ealing Town Centre Conservation Area and the reasons for its at risk status, and the architectural dominance of the Church of Our Savior.'
- 'Proposals should seek to retain and reuse the locally listed façade of the Ealing Broadway Centre, and to Respect and respond positively to the built character of the area and its heritage...' [Suggest that the second part of this bullet point becomes a new bullet point].
- 'Ensure the layout is informed by the historic street pattern and reintegrates the site into the existing street network'

03EA: Sandringham Mews

- 2.10.** On this site, tall buildings up to 12 storeys have the potential to harm multiple heritage assets. Our concerns include the potential for harm to the significance of Ealing Town Centre, which is at risk, in part due to the threat of tall development, and the grade II* Church of Our Savior. They also include Ealing Green Conservation Area which includes several highly grade assets, such as the grade I Pitzhanger Manor and its associated buildings and grounds. To help address these concerns we propose the following modifications:

Planning Designations/Site Constraints:

- 'Grade II* Listed Parish Church ...'

Contextual considerations:

- 'Site essential to the character of the town centre. It is located within an Archaeological Priority Area and Ealing Town Centre Conservation Area, which is at risk in part due to the threat of inappropriate tall buildings. It is adjacent to Ealing Green Conservation Area, which includes the grade I Pitzhanger Manor and its associated buildings and grounds, with other heritage assets in the vicinity, as well as potentially falling within the setting of several other Conservation Areas depending on the height of development. Development should conserve and, where appropriate, enhance the significance of these heritage assets by fully understanding and responding to the built character of the area and its heritage.'

Design Principles:

- 'Ensure building height, massing and street layout proposals are developed in accordance with the Tall Buildings Strategy and respond to the sensitivities of the site, in particular the character and appearance of Ealing Town Centre Conservation Area and the reasons for its at risk status, the setting of Church of Our Savior and Pitzhanger Manor. Heights are to range between 4 and a maximum 12 storeys (42m).'
- 'Consider retaining and refurbishing the 19th century terrace buildings on the site, which are of some historic significance.'

11EA: Sainsbury's and Library, West Ealing

- 2.11. Tall buildings on this site could potentially harm the Hanwell Cemeteries Conservation Area, which is comprised of two grade II registered parks and gardens – the City of Westminster and Kensington & Chelsea Cemeteries. To avoid and minimise harm to these designated assets we propose the following modifications:

Tall Buildings:

- We note that this site has a typographical error in terms of the building height, which is given as a maximum of 16 storeys but should be 13 storeys in line with EB45. Through our discussions on a Statement of Common Ground with Ealing Council, we understand that the Council proposes to correct this.

Planning designations/Site Constraints:

- 'Hanwell Cemeteries Conservation Area (nearby), grade II City of Westminster and Kensington & Chelsea Cemeteries (nearby), Locally listed buildings (nearby),...'

Design Principles:

- 'Establish a new building height 'shoulder' of 4–6 storeys on the Broadway with any taller elements set back behind this and located to avoid and minimise visibility from Hanwell Cemeteries Conservation Area and the two registered parks and gardens within it'.

01NO: Car Sales Site and Northolt Leisure Centre

- 2.12. Tall development on this site has the potential to harm the nearby Northolt Village Green Conservation Area, which covers the historic core of a former rural village and contains several other heritage assets, most notably the grade I St Mary's Church. According to the HIA, both assets can be experienced in a setting that has no or few intrusions and this means that any encroachment could amount to substantial harm to both heritage assets. It is therefore imperative that the site allocation set out suitable guidelines on avoiding and minimising harm to the historic environment. To do this, we advise the following modifications:

Planning Designations/Site Constraints:

- '...Northolt Village Green CA (nearby), grade I Church of St Mary (nearby).'

Contextual Considerations:

- 'New development should respond to the site's proximity to ~~Northolt Village Green Conservation Area, views towards St Mary's Church, a Grade I listed building and neighbouring~~ Mandeville Parkway Open Space.'
- 'New development should conserve or enhance the significance of nearby heritage assets, including any contribution made by setting, especially Northolt Village Conservation Area and the grade I Church of St Mary.'

Design Principles:

- 'Ensure building height, massing and street layout proposals are developed in accordance with the Tall Building Strategy and an understanding of the sensitivities of the site, particularly the significance of Northolt Village Conservation Area and the Church of St Mary. Heights are to range between 4 and a maximum of 10 storeys (35m) across the site, with the tallest elements situated towards the station and the middle of the site.'
- 'Ensure building heights respond to both existing properties on Eastcote Road and to emerging town centre development ~~whilst considering the visual impact on~~ and that development is not visible in combination with or from St Mary's Church and the Northolt Village Green Conservation Area.'

01GR: Greenford

- 2.13. In our Regulation 19 consultation response, Historic England requested that this allocation was updated to require that the grade II War Memorial within the site is retained. Through our discussions on a Statement of Common Ground with Ealing Council we have provisionally agreed the following proposed modification: 'Establish a heritage led masterplan approach to ensure uses, buildings and spaces are repurposed or redeveloped and integrated into the town centre in a cohesive and sensitive manner and to retain the Grade II war memorial.'

3. Site specific questions

Q.10 For each proposed development site, please set out:

j. how any site-specific recommendation on building heights is justified in terms of local context, including character, heritage and living conditions;

m. where applicable, evidence of how the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 and national planning policy approach on heritage will be met;

- 3.1. Please see our response to question 6 above where we discuss the findings of HIAs for 6 sites and how these can inform site allocation policies to help ensure that the plan is justified, effective and consistent with national policy.
- 3.2. In a separate hearing statement for Matter 6, we have made recommendations for changes to strategic policy and supporting text to help ensure that the plan as a whole can be found sound in relation to heritage considerations.

Ealing Development Sites

Q.22 Is the maximum storey height specified [for 01EA] in the Plan, correct?

- 3.3. We are concerned about the harm to heritage assets that will arise as a result of buildings up to 21 storeys in Ealing town centre - further detail and suggested modifications can be found in our response to question 6 (paragraphs 2.6-2.8).

Hanwell Development Sites

Q60.Is the allocation [05HA] justified, and will it be effective in respect of potential effects on heritage assets, including the Clock Tower Conservation Area?

In light of the heritage sensitivities of this site, it would be beneficial if the first bullet point of the 'Contextual Considerations' was modified to require the conservation and, where appropriate, enhancement of the nearby heritage assets. We would also suggest that the first bullet point of the 'Design Principles' is strengthened to require that any tall elements of the development are located so as to avoid and minimise and visibility of the development from the Clock Tower Conservation Area and Hanwell Cemeteries Conservation Areas and the two registered parks and gardens within it.

Northolt Development Sites

Q65.In light on Historic England's comments, have potential effects on heritage assets been considered and appropriately addressed?

- 3.4. Historic England request that modifications are made to ensure that the potential for substantial harm to Northolt Village Green Conservation Area and the grade I Church of St Mary are addressed. For more information on the proposed modifications please see our response to question 6.

Southall Development Sites

Q.108 Is the allocation [15SO] justified in terms of its consideration of heritage assets and potential effects on canal infrastructure?

- 3.5. In light of the heritage sensitivities of this site, it would be beneficial if the 'Contextual Considerations' and 'Design Principles', respectively, were strengthened to:
- Conserve, and where appropriate, enhance the significance of heritage assets and any contribution that setting makes to that significance.
 - Suggest that development is set back from the edge of the canal to maintain the open and green character and appearance of this sub-area of the conservation area.