



Examination of Ealing Local Plan

Matter 10: Delivery and Monitoring

Questions 4, 6b and 6d

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 regard to Matter 10 of the Local Plan Examination.
- 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

2. Matter 10: Delivery and Monitoring

Q4. In terms of Policy ENA:

For effectiveness, is it clear about when the policy would apply? Does it provide certainty about how a decision maker should react to a proposal?

2.1 In our response to the Local Plan Regulation 19 consultation, Historic England raised concerns about the enabling development policy and suggested that it is not a necessary component of a development plan. We note the preference of Ealing Council to retain this policy in the plan, and that the policy as drafted does not relate explicitly to heritage assets.

2.2 Enabling development as a mechanism for securing the conservation of a heritage asset is an established concept. The NPPF December 2023 includes two references to enabling development in relation to heritage as follows:

84. Planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply:

b) the development would represent the optimal viable use of a heritage asset or would be appropriate enabling development to secure the future of heritage assets;

and

214. Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

2.3 To supplement the NPPF, Historic England's advice on enabling development is contained in our Historic Environment Good Practice Advice in Planning: 4: [Enabling Development and Heritage Assets](#).

Suggested modification

2.4 To ensure that the plan is justified, effective and consistent with national policy, we request the addition of a further policy criterion for enabling development and heritage as follows:

Policy ENA Enabling Development

C. Enabling development for heritage assets will be assessed according to national planning policy and Historic England's enabling development guidance.

2.5 We will discuss this suggested change with Ealing Council with the aim of reaching further agreement through our Statement of Common Ground.

Q6. In terms of how the Plan will be monitored:

b. do the proposed indicators provide adequate coverage across each of the policies of the Plan?

2.6 Historic England considers that there should preferably be monitoring indicators relating to the historic environment within the plan.

2.7 Through the process of preparing a Statement of Common Ground with the Council, we have been informed that the Council monitors a number of KPIs relating to heritage, i.e. change in the number of heritage assets, the number of assets on the Heritage at Risk Register, and appeal decisions.

d. are any modifications needed to the monitoring framework for soundness?

2.8 It would be helpful if the monitoring indicators referred to above were incorporated into the Local Plan monitoring framework, to ensure that they are taken into account in future monitoring and review of planning policies.