

## **Ealing Council's Development (Core) Strategy Examination: Matters for Hearing Sessions**

### **Matter 2 – Vision and Objectives (Chapter 1)**

#### **Representation number 75**

#### **Submission by Anthony Lewis (Representor number 22) on behalf of the Ealing Cricket Ground Conservation Area Panel**

1. In answer to the Inspector's questions, there is an imbalance between the importance ascribed in Ealing Council's draft Development (or Core) Strategy to the protection and enhancement of Ealing's green and open spaces, which is specified under Policy 1.1i and to which Chapter 5 is devoted, and the lack of importance ascribed to heritage assets which are not mentioned at all in the draft Development (or Core) Strategy document.

2. The protection and enhancement of the Metropolitan Green Belt, Metropolitan Open Land, Green Corridors, Parks and Local Green Space are covered in detail in Chapter 5, with specific policies. However, heritage assets - including Conservation Areas and listed buildings - are not mentioned at all.

3. We propose, in particular, that Policy 1.1 - the Spatial Vision for Ealing - should include a further sub-heading to balance Policy 1.1i:

"To protect Ealing's Conservation Areas and to ensure that all new development protects and enhances the character and appearance of Ealing's Conservation Areas and their settings."

4. We then propose that there should be an extra chapter in the Development (or Core) Strategy which deals specifically with heritage assets, including Conservation Areas and listed buildings, as set out later in this submission.

5. Despite the disparate treatment in Ealing Council's draft Development (or Core) Strategy, equal weight is given to the protection of both heritage assets and open spaces in the London Plan.

6. Policy 7.8 of the London Plan 2011 is very specific about the importance of heritage assets, including Conservation Areas.

7. London Plan Policies 7.17 and 7.18 deal, respectively and in a similar way, with Metropolitan Open Land and protecting Local Open Space.

8. Because of its significance, we quote Policy 7.8 of the London Plan below:

**London Plan Policy 7.8**  
**Heritage assets and archaeology**

**Strategic**

A London's heritage assets and historic environment, including listed buildings, registered historic parks and gardens and other natural and historic landscapes, conservation areas, World Heritage Sites, registered battlefields, scheduled monuments, archaeological remains and memorials should be identified, so that the desirability of sustaining and enhancing their significance and of utilising their positive role in place shaping can be taken into account.

B Development should incorporate measures that identify, record, interpret, protect and, where appropriate, present the site's archaeology.

**Planning decisions**

C Development should identify, value, conserve, restore, re-use and incorporate heritage assets, where appropriate.

D Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail.

E New development should make provision for the protection of archaeological resources, landscapes and significant memorials. The physical assets should, where possible, be made available to the public on-site. Where the archaeological asset or memorial cannot be preserved or managed on-site, provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset.

**LDF preparation**

F Boroughs should, in LDF policies, seek to maintain and enhance the contribution of built, landscaped and buried heritage to London's environmental quality, cultural identity and economy as part of managing London's ability to accommodate change and regeneration.

G Boroughs, in consultation with English Heritage, Natural England and other relevant statutory organisations, should include appropriate policies in their LDFs for identifying, protecting, enhancing and improving access to the historic environment and heritage assets and their settings where appropriate, and to archaeological assets, memorials and historic and natural landscape character within their area.

9. Other London Boroughs, in drafting their LDF documents, have found it appropriate to include the protection of heritage assets, including Conservation Areas and listed buildings, in their Development (or Core) Strategy document.

10. For example, the London Borough of Hammersmith and Fulham which - in common with Ealing - has many Conservation Areas, devotes Chapter 9 of its Submission Core strategy document KD1 dated January 2011 to Borough-wide Strategic Policies. One section of this chapter is devoted to Open Space and its improvement and protection (Strategic Policy OS1), while another - equally important - section is devoted to the Built Environment, including the preservation and enhancement of its heritage assets (Strategic Policy BE1).

11. The London Borough of Richmond has already adopted its Core Strategy. Section 6.2 is entitled "Protecting Local Character". Paragraph 6.2.1 is concerned with the protection and enhancement of the built environment, which includes Conservation Areas. Paragraph 6.2.2 is concerned with the protection of open spaces.

12. We consider it is essential that there is such a juxtaposition of policies in Ealing Council's Development (or Core) Strategy, and that the protection and enhancement of heritage assets - including Conservation Areas and listed buildings - should be mentioned alongside the protection and enhancement of open spaces, and be ascribed equal importance.

13. We consider Ealing Council's response to our original representation ("Conservation Areas will be defined on the Neighbourhood Profile maps") to be completely inadequate and thus unsound. We find Ealing Council's proposed action of "no change" to the Development (or Core) Strategy document in relation to Conservation Areas to be inconsistent with the approach adopted by other London Boroughs, and thus to be unsound.

14. From a purely practical point of view, we consider it is essential that Ealing's 29 Conservation Areas - and any areas under consideration for designation in the future - are mentioned in the Development (or Core) Strategy document, as that is where developers, planners and other people interested in the development of Ealing over the next 15 years will expect to find comprehensive information about all aspects of land use in Ealing, as part of Ealing Council's spatial vision. Any person or organisation involved in development or planning of any kind needs to be aware of the equal importance of heritage assets and open spaces, and for the significance of both heritage assets and open spaces to be set out in the same core document.

15. We consider the current lack of balance in Ealing Council's draft Development (or Core) Strategy to be unsound, especially as Conservation Areas are established in accordance with national policy guidelines as set out in Planning Policy Statement 5: Planning for the Historic Environment.

16. In terms of paragraph 4.52 of Planning Policy Statement 12 and the tests of soundness, we believe that the omission of heritage assets, including Conservation Areas and listed buildings, from Ealing Council's draft Development (or Core) Strategy cannot be justified, granted the importance ascribed to them in the London Plan and the Development (or Core) Strategy documents of other London Boroughs.

17. We also consider that Ealing Council's draft Development (or Core) Strategy will not be effective unless heritage assets are mentioned alongside open spaces, because those involved in development and planning need to find both sets of information in the same document.

18. Finally, we consider that Ealing Council's draft Development (or Core) Strategy will not be consistent with national policy because current national policy accords equal importance to the protection of both heritage assets and open spaces.

19. We consider that Ealing Council's draft Development (or Core) Strategy document can become sound if the changes we suggested in our original representation are included, namely:

As mentioned above, we propose that Policy 1.1 - the Spatial Vision for Ealing (pages 14 and 15) - should include a further sub-heading to balance Policy 1.1i, as follows:

"To protect Ealing's Conservation Areas and to ensure that all new development protects and enhances the character and appearance of Ealing's Conservation Areas and their settings."

Further, while we note that the whole of Chapter 5 of the Development (or Core) Strategy is devoted to protecting and enhancing Ealing's Green and Open Spaces, we believe that equal weight in this important overarching document should be given to Ealing's 29 Conservation Areas (and any further areas designated in future), and to statutorily listed buildings within Ealing's boundaries and to Ealing's locally listed buildings.

This means that developers, planners and others will be fully aware of the Conservation Areas and listed buildings, and that all the necessary high-level information will be contained within the same document.

We propose that there should be an extra chapter in the Development (or Core) Strategy which includes the following information:

1. An introduction which sets out the significance of the Conservation Areas, along the lines of the introduction to Chapter 5. It could start, for example, as follows: "Ealing's Conservation Areas are considered to be some of its many attractions. There are 29 Conservation Areas in the borough which cover a total of xxx square kilometres. Although the Conservation Areas are spread across the borough, there is a particular concentration of Conservation Areas in and around Ealing Town Centre."
2. A map showing all the Conservation Areas, and proposed Conservation Areas, together with an alphabetical list.
3. A cross-reference to the Conservation Area character appraisals and management plans.
4. A list of all heritage assets (within the meaning of PPS5) in the London Borough of Ealing, including statutorily listed buildings, locally listed buildings, and of buildings of facade or group value.
5. A statement setting out the reasons for designating heritage assets, especially Conservation Areas and listed buildings.
6. A statement setting out the reasons for valuing heritage assets, especially Conservation Areas and listed buildings.
7. A statement setting out ways of preserving and enhancing Conservation Areas.
8. A statement setting out ways of promoting Conservation Areas and addressing deficiencies within Conservation Areas.