



ENGLISH HERITAGE

WRITTEN REPRESENTATIONS

ON BEHALF OF

ENGLISH HERITAGE

**(HISTORIC BUILDINGS AND MONUMENTS COMMISSION FOR
ENGLAND)**

REPRESENTATION NUMBER: 317

London Borough of Ealing:

Development Management Development Management DPD

Matter 5: Development Management DPD

1. INTRODUCTION

- 1.1 The following statement has been prepared following the London Borough of Ealing's Development Management DPD.
- 1.2 English Heritage in its response to the Draft Development Management DPD raised concerns with regards to consideration of heritage matters in the DPD. The majority of the concerns raised have been addressed and are set out in the Statement of Common Ground (SCOG) between English Heritage and Ealing Council. An issue which has not been fully addressed and which has been set out in the SOCG relates to the development of a Borough-wide Characterisation study as a tool in which to identify and manage local character.

2. SCOPE OF WRITTEN REPRESENTATIONS

- 2.1 English Heritage will not be attending the Examination in Public for this Matter and, so as an aid to discussions, have prepared this statement which explains the role of English Heritage in the development plan process and further clarity on the points set out in our SOCG with Ealing Council.

3. THE ROLE OF ENGLISH HERITAGE

- 3.1 English Heritage is an independent grant-aided body governed by Commissioners. It was established with effect from 1st April 1984 under section 32 of the National Heritage Act 1983.
- 3.2 The general duties of English Heritage are prescribed in Section 33(1) of the Act and are as follows:
' ... So far as is practicable...,
 - a) to secure the preservation of ancient monuments and historic buildings situated in England;
 - b) to promote the preservation and enhancement of the character and appearance of conservation areas situated in England; and
 - c) to promote the public's enjoyment, and advance their knowledge, of ancient monuments and historic buildings situated in England and their preservation.'
- 3.3 English Heritage is a statutory consultee providing advice to local planning authorities on the formulation of the Development Plan Documents. This includes advice on the implementation of Development Management DPD. English Heritage is the lead body for the heritage sector and is the Government's principal adviser on the historic environment.

4. MATTERS ARISING AND RESPONSE OF ENGLISH HERITAGE

Context

- 4.1 The *National Planning Policy Framework* (NPPF) (2012) sets out the principles of achieving sustainable development through the delivery of economic, social and environmental gains jointly and simultaneously through the planning system. The government expects the planning system to play an active role in guiding development to sustainable solutions. This includes seeking positive improvements in the quality of the built and historic environment (NPPF paragraphs 8 and 9).
- 4.2 At the heart of the NPPF is the presumption in favour of sustainable development which is seen as a golden thread through both the plan-making and decision-making processes. This is supported by the application of the Core Planning Principles, which include the need for planning to conserve heritage assets in a manner appropriate to their significance (NPPF paragraph 17).
- 4.3 More specific design policy guidance is provided that relate to the need for local planning authorities to set out in their Local Plan robust and comprehensive policies that set out the quality of development that will be expected for the area, and which should be based on an understanding and evaluation of its defining characteristics. (NPPF paragraph 58) Policies and decisions should aim to ensure developments respond to the local character and history by reflecting the identify of the local surroundings. In addition policy guidance seeks developments to address the connections between people and places and ensure integration of new developments into the natural, built and historic environment. (NPPF paragraphs 58 and 61)
- 4.4 In case of heritage issues specific policy advises that local planning authorities should set out in their Local Plans a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This is achieved by taking into account amongst many other requirements, the desirability of new developments making a positive contribution to local and distinctiveness and drawing upon the contribution made by the historic environment to the character of a place (NPPF paragraph 126).

Case for a Borough Characterisation Study

- 4.5 It is recognised that the Development Management DPD through its policies Ealing Local Variation (ELV) to policy 7.4 Local Character, policy 7B Design amenity, policy 7C Heritage (as set out in the agreed SOCG) and include Community ELV to policy 7.7 Location and Design of Tall and Large Buildings, collectively seek to provide a framework in which to manage and deliver good design that is responsive to the local and historic character of a place. It is also noted that a number of

area based studies already exist, such as conservation area appraisals, area action plans and development framework, that provide some level of understanding of the character of parts of the Borough. However it is not clear from the evidence provided the extent of coverage provided by these studies and their value in helping to inform robust understanding of the character of the Borough and its component parts.

- 4.6 In response to, and to ensure compliance with the NPPF, English Heritage through its representation to the Development Management DPD has encouraged the Council to undertake a Borough-wide characterisation study. Ealing Council have responded by stating that they are unable to commit to a Borough-wide character study at this stage and the policies developed are designed to work well with a wide range of pre-existing evidence. English Heritage has noted this position but still encourage the Council to undertake a Borough-wide characterisation study. The SOCG sets out the position of both parties.
- 4.7 This Statement seeks to set out the reasons why English Heritage encourages Ealing Council to commit themselves to undertaking a Borough-wide characterisation study. These reasons are that this type of study:
- Would provide a strategic overview of the Borough and its component parts as a starting point in which to understand and value its local and historic character;
 - Could be developed by utilising existing studies and then identifying gaps where additional understanding needs to be developed;
 - Ensure that existing studies are accurate and understood within the wider context of Borough-wide character;
 - Highlight other buildings, areas, and townscape features that are of heritage interest and protection;
 - Be used to inform future policy development and appraisals of development proposals.
 - Provide a sound basis for developing principles of good design which are demonstrably based on local distinctiveness
 - Identify suitable areas for development and change management based on a thorough understanding of local character and context; and
 - Identify opportunities for enhancing and protecting heritage assets
- 4.8 These are all benefits which will enable the effective implementation of the Local Plan and ensure the delivery of sustainable development that responds to the local and historic character of Ealing. This approach

and its benefits are supported by the Mayor of London through the London Plan policy 7.4 part C – Local Character. The recently public consultation draft Supplementary Planning Guidance *Shaping Neighbourhoods: Character and Context* (2013) further emphasises the value of undertaking character studies, including those Borough-wide, as a tool in which to inform policy development, decision making or site design.

- 4.8 It should be noted that this approach of developing a Borough-wide characterisation study and using its findings, has been actively pursued by many of London's Boroughs. The majority have developed them as evidence to help provide an understanding of the local and historic character of their Boroughs as a valuable tool in which to inform plan and decision making purposes. Recognition of the value of undertaken a Borough-wide characterisation to aid in the development and implementation of policy was raised at the Examination In Public into the Hillingdon Local Plan part 1 Strategic Policies (PINS File Ref: PINS/R5510/429/7). The Inspector agreed with our comments that the Local Plan would benefit from a Borough wider character appraisal that would have provided at the time a comprehensive overview, which could inform more detailed assessments of the impacts of developments. Hillingdon Council at the time of the EIP agreed to undertake a Borough-wide characterisation study and to use it to inform work on the detailed part of the Local Plan to follow. The Inspector welcomed this approach (PINS/R5510/429/7 paragraph 47).

5. Conclusion

- 5.1 English Heritage support the development of a Borough-wide characterisation study as a valuable tool in which help meet the requirements of the NPPF by informing greater understanding of the local and historic character of an area. This understanding can then help provide a framework in which to develop strategic and area specific policy, appraise development proposals and identify development/design principles for area and site specific schemes.