



Historic England

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Mr Steve Austin
London Borough of Ealing
Perceval House
14-16 Uxbridge Road
London
W5 2HL

Direct Dial: 020 7973 3785

Our ref: P00494810

3 February 2015

Dear Mr Austin

**Arrangements for Handling Heritage Applications Direction 2015 & T&CP (Development Management Procedure) (England) Order 2015
ARCADIA, 9-42, THE BROADWAY, EALING, LONDON
Application No P/2015/3479**

Thank you for your letter of 14 January 2016 notifying Historic England of the above application.

Summary

Historic England objected to this application in its original form (attached), finding substantial harm to the historic environment as a result of the proposals to demolish an entire urban block at the heart of the Ealing Town Centre Conservation Area. The amended scheme retains one building from this block, and two street-facing facades. Despite these changes we continue to find that the complete demolition of eleven buildings which positively contribute to the character and appearance of the conservation area, and the wider impacts of the replacement buildings which will dominate the settings of surrounding designated heritage assets amounts to substantial harm. On this basis we maintain a strong objection to the proposals.

Historic England Advice

Further to our previous advice letter dated 16th September 2015, we note the amendments to the scheme. These are to partially retain three of the historic buildings that would previously have been demolished, and the reduction in height of part of the Broadway façade to reduce the impact of the scheme on views of the Grade II* listed church of Christ the Saviour.

While Historic England welcomes the modifications, these only go part way to responding to the fundamental concerns we initially raised. These remain:

- The demolition of almost the entire urban block, and with it a major part of Ealing's Edwardian and Victorian built heritage. The council's own conservation area appraisal clearly identifies eight of these buildings as making a positive contribution to the character and appearance of the area. Five of these will be



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demolished, two will have their facades retained, and only one building identified by the council as contributing positively to the conservation area will remain in tact.

- The impact on the setting of the Grade II* listed church of Christ the Saviour. This church, constructed in 1852 to the designs of Sir George Gilbert Scott, is a key landmark for the town centre. Its role as such was recognised in the 2009 inspector's report. The amended scheme continues to largely obscure the visibility of the clock and belfry in long views (view 23 in the Townscape and visual impact assessment addendum).
- The setting of the Grade II listed National Westminster Bank, which is located on the opposite side of The Broadway. Constructed as Ealing's first town hall, this building has increased local significance and is an important component of the Conservation Area. The construction opposite this building of a nine story structure remains a prominent harmful impact at this sensitive corner of the conservation area.
- The character and appearance of the Haven Green Conservation Area, the principal feature of which is Haven Green, a public park and open space that reflects Ealing's rural origins. The impact here is likewise unchanged by the amendments: in all views looking south the tower of the proposed development will be a dominating feature.

There will also be an impact on views from several neighbouring Conservation Areas: Montpelier Park, Manor Park, Mount Park, Ealing Common and Ealing Green. Further impacts will include the setting of Walpole Park, which is a Grade II registered Park and Garden of Special Historic Interest that is intrinsically linked to the Grade I listed Pitzhanger Manor.

Despite the modifications, Historic England considers that the impact of the proposal on the Ealing Town Centre Conservation Area would still be substantial harm. Paragraphs 131-133 of the National Planning Policy Framework set out the exceptional criteria required to justify such harm.

If this scheme is approved and built, the Council should undertake a review of the conservation area including a full public consultation. We are likely to advise that the Ealing Town Centre conservation area will no longer merit its status, as per paragraph 127 of the NPPF. This will directly result from the loss of buildings that make a positive contribution to the special historic and architectural character of the conservation area, and because of the scale and overbearing impact of recent developments. We note that this conservation area is already highlighted on our Conservation Area Management Survey as being 'At Risk', due to the threats to significance caused by the potential loss of historic buildings through redevelopment.



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To this end we would encourage the Council to consider the scheme very carefully, noting the requirements in the Town and Country Planning (Listed Buildings and Conservation Areas) Act 1990, for special attention to be paid to the desirability of preserving or enhancing the character or appearance of a conservation area.

In our view it would be possible to achieve many of the development aims without the requirement for such wide-scale demolition, or a contextual new design. This would however require several of the first-principles of the scheme to be adapted, such as the location of the passage through the development, the width of pavement required on the eastern side of the site, and the requirement for a flat frontage onto the Broadway.

Recommendation

We continue to recommend that Ealing Borough Council either seek significant amendments to avoid the harm outlined above, or, if the applicants do not wish to amend the scheme, to refuse planning permission.

Please note that this response relates to historic building and historic area matters only. If there are any archaeological implications to the proposals it is recommended that you contact the Greater London Archaeological Advisory Service for further advice (Tel: 020 7973 3712).

Yours sincerely

David English

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cc

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