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



austins@ealing.gov.uk
By email

19 February 2016

Dear Mr Austin,

Planning application: P/2015/3479 - Redevelopment and demolition of 9-42 The Broadway and 1-4 Haven Place (retaining No.9 and the front facades of No.14 and No.15-16 The Broadway) and erection of 8 new buildings (ranging from 2 storeys to 18 storeys)

SAVE Britain's Heritage writes to **strongly object** to this planning application, which proposes the almost complete demolition of an entire urban block within the Ealing Town Centre Conservation Area. We consider that both demolition of the existing buildings and the proposed replacement buildings would cause significant harm to the Conservation Area and surrounding listed and unlisted buildings. We therefore request that planning permission be **refused**.

We note the letters of objection submitted by Historic England (16 September 2015 and 3 February 2016) and the Victorian Society (9 February 2016), and our letter is in support of these. We also note the significant local opposition to the scheme, including a petition which, at the time of writing, contains over 900 signatures.

The site is located within the Ealing Town Centre Conservation Area, and contains eight buildings that are noted for making a positive contribution to it. The existing buildings are a mix of fine grain Victorian and Edwardian architecture (with a number of more recent additions), predominantly of red brick with stone dressings, gables and mouldings, no more than four storeys in height.

Within the site's setting are a number of designated and undesignated heritage assets, including the Grade II\* George Gilbert Scott church of Christ the Saviour, the Grade II listed former Natwest Bank building, and the Haven Green Conservation Area.

The application proposes to clear the entire site, save for No. 9 The Broadway, and the facades of Nos. 14-16. This will cause substantial harm to the undesignated heritage assets and the Conservation Area, and affect the setting of other heritage assets in the vicinity. The retention of the facade of No. 14 as an open archway is a particularly clumsy attempt to integrate it into the development.

The proposed new buildings are of a much larger bulk and height, including an 18 storey residential tower, which are incongruous to their surroundings. The proposals are entirely out of character with the Conservation Area and wider setting, and will cause substantial harm to designated and undesignated heritage assets. Historic England's letter of 16 September covers this harm in greater detail, and we agree with their assessment. We also agree that the proposed public benefits of this application are not enough to warrant such harm, and could be delivered as part of a scheme that retains more of the existing buildings.

The application in its current form fails to comply with NPPF paragraphs 131, 132, 133, 135, 137. The application in its current form also fails to comply with local policies, including 1.1 (h), and 1.2 (g) of the Development Strategy, and 7.7, and 7.12 of the Development Management Plan.

Historic England conclude that this scheme would cause such harm to the Conservation Area that it would call into question its very designation. This is a very serious point which must be given great consideration when the planning decision is made.

Should your council approve this application, it would set an extremely dangerous precedent for heritage protection within the borough, and potentially open the floodgates to inappropriate and damaging development in other Conservation Areas.

For these reasons we request that this application be **refused**. A more sensitive approach to this site is required, one which gives greater focus to heritage assets, both on site and in the surrounding area. This would result in a scheme which works with the grain of the area, enhancing the Conservation Area and making the development unique to Ealing, rather than being a piece of overscaled 'anywhere architecture' as is currently proposed.

Please notify me once a decision has been made.

Yours sincerely.

Mike Fox Caseworker