

Summary of Proof of Evidence

ANTHONY LEWIS

on behalf of the

EALING CONSERVATION AREA PANELS

Planning Inspectorate reference: APP/A5270/V/09/2097739

London Borough of Ealing reference: P/2007/4246

1. Over the years, the London Borough of Ealing has recognised the potential threats to the Victorian, Edwardian and Twentieth Century character of Ealing Town Centre and its surroundings by creating six contiguous Conservation Areas. This action acknowledges the significance of heritage in the appreciation of space and place which is so important to settled suburban communities. Development policy has therefore been directed towards relating proposals to the existing character of the area, to its historic and architectural quality, and to its green setting.
2. The Secretary of State is especially concerned about the preservation and enhancement of the Conservation Areas, and thus reflects the concerns of the Conservation Areas Panels about the proposed development.
3. We consider that much harm will be caused to the Conservation Areas by many aspects of the proposed development, as set out in this summary statement.
4. Both Conservation Areas in the centre of Ealing (Haven Green and Ealing Town Centre) have a mix of uses, as befits a town centre at the heart of a Borough of 300,000 people. Good quality residential provision is, and has always been, peripheral to the site. This development will introduce high density flats into far too small a footprint to support them. It will reduce a town centre facility to a housing development with some retail provision, which will downgrade Ealing town centre's current role and thus alter the character of the Conservation Areas.
5. The proposal will harm Haven Green's public open space because it will be used as amenity space by the more than 900 additional residents for whom no such facility will be provided within the development. The result will be over-use and overcrowding of this restricted space.

6. Trees are especially endangered. They are critical to the Conservation Areas and are intrinsic to the historical image of Ealing as a green suburb. Despite the conditions imposed, the trees are extremely vulnerable and their loss would harm the Conservation Areas irrevocably.
7. Ealing Council's acknowledgement that poor quality twentieth century developments have seriously threatened the character of the Conservation Areas should alert us to the possible harm of this development. Although "quality" is usually assessed in architectural terms, we widen the definition to include all aspects of the proposed development: the over-dominant use of the site for residential purposes, the over-development and over-densification, the lack of on-site infrastructure, and the impact on the views from the other Conservation Areas - all of which are damaging to the Conservation Areas.
8. Much higher buildings of up to 11 storeys, especially in The Broadway, will create cavernous shopping environments. The pavements will not reach the desirable New Broadway widths, resulting in shadowing and wind turbulence. This will fail to enhance the Conservation Areas.
9. Nearby listed buildings of considerable historic interest will be severely compromised by the overwhelming scale of Block F and the bulk of the other blocks, and their townscape value will be diminished.
10. Ignoring the low-rise domestic and commercial buildings, open spaces, and Victorian and Edwardian elegance will harm the Conservation Areas. The proposed development will impose bulk and mass appropriate to a city centre, and will harm the existing suburban character of Ealing. It will impose a commuter, landlord-rented, city centre population on a currently settled, owner-occupied suburb.
11. The enclosure and containment of Haven Green by means of blocks between 12 and 26 storeys high will be harmful to local residents and the public open space.
12. Rafting the railway line with tall buildings is not necessary to improve connectivity between Haven Green and the town centre. Instead of linking the two Conservation Areas, this will create a much larger barrier.
13. Ealing Council's policy precludes high buildings (over 20 metres high) in Conservation Areas.
14. The proposed development will have an adverse impact on the narrow Springbridge Road.

15. Lack of information about external finishes and details, and leaving this important matter to be determined later, is inappropriate for a planning application of this magnitude in a Conservation Area.

16. The regeneration justification ignores or dismisses the value of Conservation Areas. Ealing Council created the Conservation Areas to protect its valued heritage and historical environment, not for it to be subsumed by inappropriate overdevelopments such as this one. Conservation Areas define a significant part of Ealing and show respect for earlier developments.

17. This application should be refused because of the harm that it will cause to the Town Centre and Haven Green Conservation Areas. It is too big a development on too small a space and in the wrong place. Conservation Areas are extremely important in regeneration, but regeneration cannot be used as a justification for adverse impacts on Conservation Areas.