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# Planning Statement

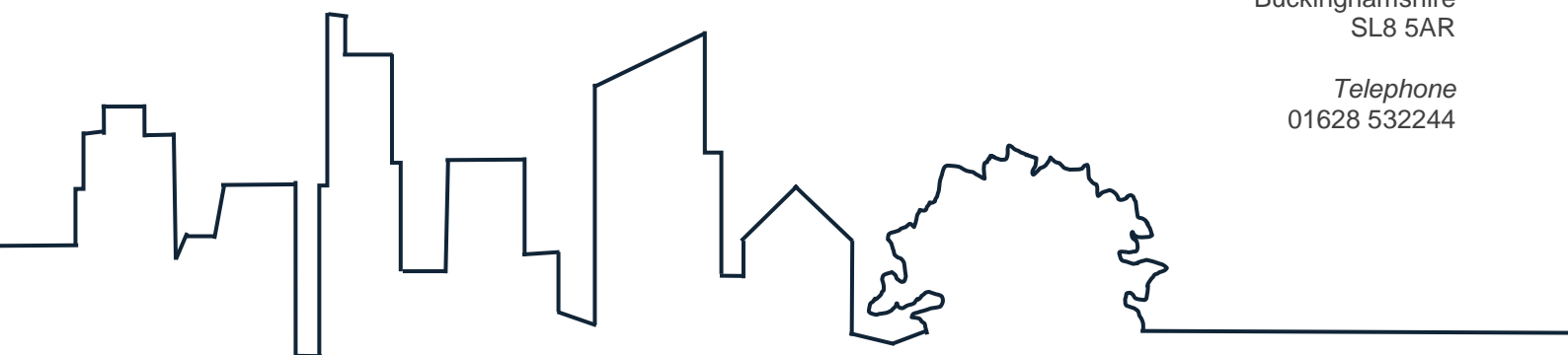
Ealing Town Hall  
Uxbridge Road, Ealing  
On behalf of Mastcraft Ltd

**January 2019**

## **Walsingham Planning**

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## **1.0 INTRODUCTION**

- 1.1 This Statement accompanies the full planning and Listed Building Consent applications made on behalf of Mastcraft Ltd seeking approval for conversion, alterations and extensions of Ealing Town Hall to retain publicly available facilities and provide a new hotel.
- 1.2 At the Cabinet Meeting in July 2016 Ealing Borough Council resolved to approve the selection of Mastcraft Ltd as the preferred bidder for the development and refurbishment of Ealing Town Hall. Bidders had been required to “provide a suitable mix of uses across the commercial/civic/public spectrum”. Four bidders from an original list of seven were shortlisted. Each of the four proposed a hotel use as the commercial element to underpin the restoration of the town hall and the long-term retention of the civic and public uses in the retained building.
- 1.3 The application is now submitted following an extended period of pre-application discussion and negotiation with the Council as local planning authority and with Historic England based upon draft schemes.
- 1.4 The application submission package comprises:
- Plans – both existing and proposed.
  - Completed application forms, CIL additional information forms , Certificate B, planning fee in the sum £25, 205.
  - Planning Statement – Walsingham Planning.
  - Design & Access Statement – ADZ.
  - Heritage Impact Assessment – Cotswold Archaeology.
  - Building Condition/Restoration Strategy – LSH.
  - Archaeological Desktop Assessment - Cotswold Archaeology.
  - Ecological (Bats) Assessment – Thornton Ecology.
  - Utilities & Services Report – Flatt.
  - Travel Plan & Access Statement – SWECO.
  - Drainage + SUDS Assessment – Clancy.
  - Hotel + Public Use Management Plan – ADZ (inc. in D+AS).
  - Car Parking Management Plan – SWECO.
  - Refuse Management Plan – ADZ (inc. in D+AS).

- Universal Access Statement – ADZ (inc. in D+AS).
- Sustainability & Energy Report – Flatt.
- Sunlight & Daylight Report – GVA.
- Air Quality Report – Air Quality Consultants.
- Fire Strategy – ADZ (inc. in D+AS).
- Secure by Design & Counter Terrorism Report – ADZ (inc. in D+AS).
- Noise Report – Hann Tucker.
- Construction Management Plan – Clancy.
- Air Quality Assessment
- Method Statement and Heritage Schedule - ADZ

## **2.0 BACKGROUND**

2.1 At the Cabinet Meeting in July 2016 Ealing Borough Council resolved to approve the selection of Mastcraft Ltd as the preferred bidder for the development and refurbishment of Ealing Town Hall. Bidders had been required to “provide a suitable mix of uses across the commercial/civic/public spectrum”. Four bidders from an original list of seven were shortlisted. Each of the four proposed a hotel use as the commercial element to underpin the restoration of the town hall and the long-term retention of the civic and public uses in the retained building.

2.2 The merits of the Mastcraft bid were recorded in the cabinet papers as:-

- It designated a greater range of commercial uses at ground and basement levels. These uses include a hospitality area, three meeting rooms, a health & fitness centre to include a pool, a restaurant with private dining area, cocktail bar and bistro which activates the frontage to Dickens Yard.
- The commercial uses proposed will draw additional people to the area and will aid town centre regeneration.
- The hotel would be similar in design and style to the Courthouse Hotel in Old Street, Shoreditch. This is a luxury, boutique hotel and the proposed development would bring regenerative benefits to Ealing.
- The uses are generally available to the public, restaurant, bar and space for hire.
- Mastcraft identify eight rooms in addition to the Victoria Hall that would be available for hire for public and community use. These eight rooms extend to 10,248 sq.ft (including the Victoria Hall).
- Mastcraft’s link to the DRP is considered a good design feature.

2.3 The design solution was held to be acceptable insofar as it included all of the following elements:-

- Demolition and rebuild of the rear central section of the property.
- Maximisation of the development potential of the building centred on a new hotel.
- Redevelopment that is broadly sympathetic to heritage and historic environment considerations and full retention of the existing façade of the building.
- Deliver varying levels of animation, active frontage and passive surveillance to both the front and, in particular, to the rear of the building.

- Provide a restaurant/bistro and lobby lounge/cocktail bar on the ground floor.
- Operate servicing to the building from the side and rear of the property.

- 2.4 While the Cabinet decision was not made as planning authority, certain land use and design parameters set by the Council as landowner were identified and were recognised as having been satisfied by the Mastcraft scheme.
- 2.5 There is no relevant planning history to the Town Hall itself that has a bearing on the current proposal, although the scheme can only be viewed in the context of the Dickens Yard development which in effect wraps around the older building, which is Grade II listed, and which sets a precedent as regards scale, height, materials and context.
- 2.6 As with any planning application, compliance with national and local policy is required. This Statement considers the relevant policies and concludes that the proposal satisfies each relevant element of planning guidance.

### **3.0 THE SITE & SURROUNDINGS**

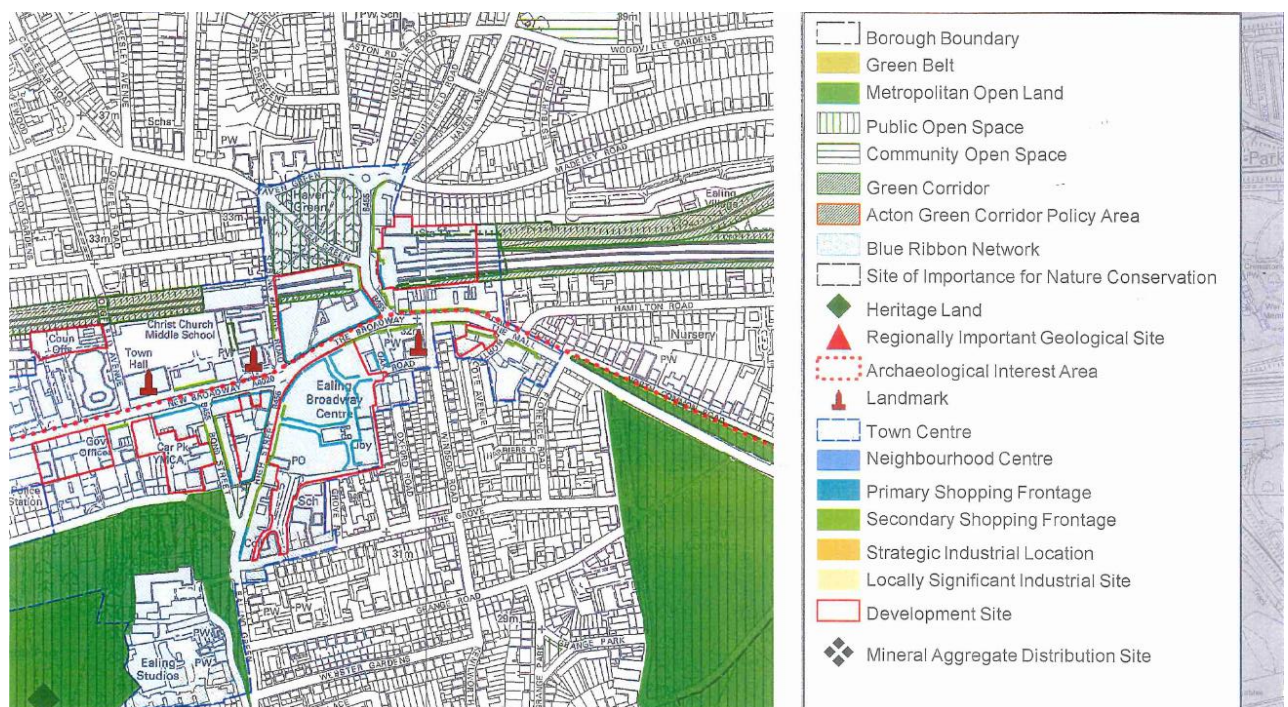
- 3.1 The site and surroundings are described and illustrated in far greater detail in the accompanying Design & Access Statement and Heritage Impact Assessment (HIA) which also provides an analysis of the evolution of the building. The accompanying “Gazetteer” prepared by Alan Baxter Associates provides a detailed room by room inventory of the building as a matter of record and as a basis for the detailed design and interior treatments of the scheme. The accompanying Archaeological Desktop Study sets out the historical context of the site.
- 3.2 For the purposes of this Statement, the building is a fine Listed Building (grade II, see Appendix I for listing entry) with a very imposing façade to New Broadway within the town centre Conservation Area.



**Ealing Town Hall frontage to New Broadway**

- 3.3 Important to this Statement and the consideration of the scheme for planning policy purposes is the assessment of significance of the Town Hall itself and the Conservation Area against which any harm can be measured.

- 3.4 Paragraph 4.54 in the HIA detail the town hall significance (in particular para 4.57) and at para 4.67 “In sum, evidentially, whilst Ealing Town Hall is undoubtedly a fine example of later neo-gothic architecture, later extended, it is not in the first rank of this class of building, many of which date wholly from the Victorian period”.
- 3.5 Paragraph 7.6 of the HIA sets out the reasons given for designation of the Conservation Area including “A Victorian and Edwardian architectural heritage, with most building relating to the expansion of Ealing as a desirable London suburb”.
- 3.6 The Town Hall site is identified as being within the town centre and the building itself is a local landmark, one of three in the vicinity.

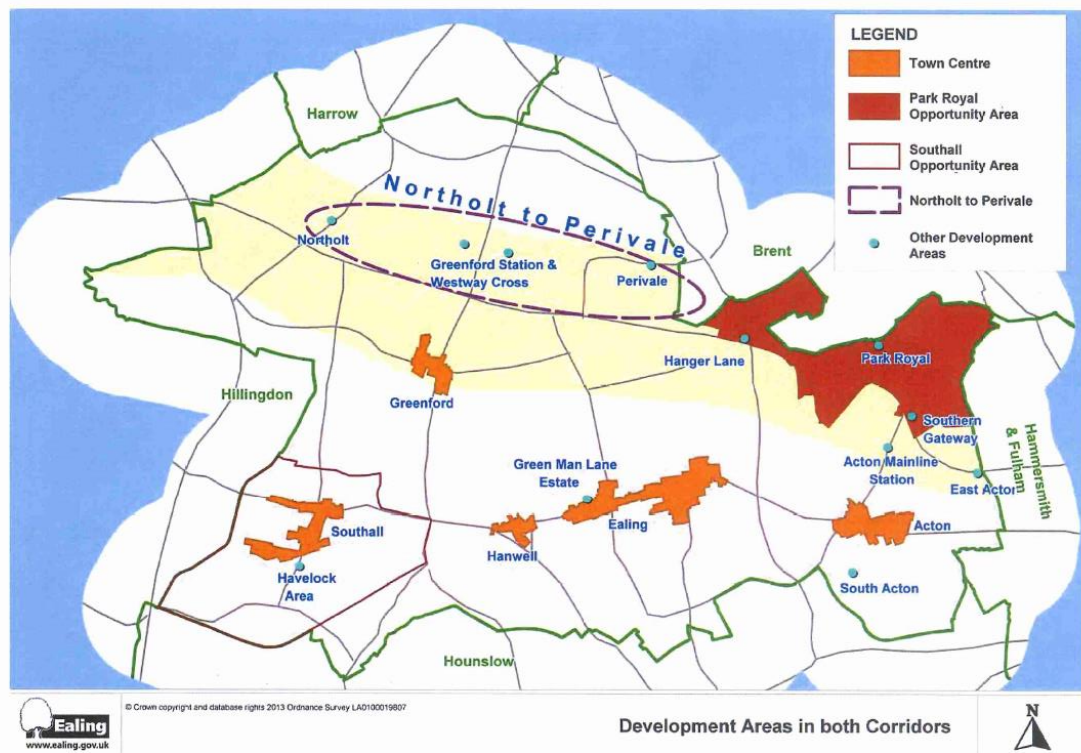


- 3.7 Ealing town centre is a very busy metropolitan hub with an extensive range of retail, cultural and employment activities together with excellent transportation links into central London and out to the Winterland to the west (to be significantly improved with the opening of Cross Rail).
- 3.8 The application site is within the Uxbridge Road corridor as set out in Policy I.1 Ealing Core Strategy. This establishes the growth principles to be applied in the borough over the



plan period to 2026. New commercial and residential development will be concentrated along the Uxbridge Road and A40 corridors, looking to ensure the viability and vitality of the town centres, principally Ealing, Acton, Southall and Greenford. The strategy looks to create a net increase of 10,600 new jobs across all sectors and to ensure that there is sufficient development land capacity to accommodate this growth. The Uxbridge Road corridor, in particular, coincides with the route of Crossrail.

**Map 5: Development Areas in Both Corridors**



L B Ealing's Development (Core) Strategy

Adopted 3rd April 2012

- 3.9 The Town Hall on the western edge of the main shopping area toward the extensive commercial/office development beyond to the west and with the modern 7 storey civic offices immediately to the west beyond Longfield Avenue. The 8 storey recent ground floor commercial with residential above development of Aspley House lies immediately to the north of the site across pedestrian/service access way. East of the site along New Broadway there are 4 storey Edwardian shops with residential flats above.



**Ealing Town Hall from the west with new Civic Centre in foreground**

- 3.10 South of New Broadway opposite the site work is underway on a 5-7 storey redevelopment of the Filmworks site. North east of the site there is the Dickens Yard redevelopment site with commercial and residential development rising to a maximum of 14 storeys.



**Ealing Town Hall from Uxbridge Road from West**





**Ealing Town Hall with Dickens Yard development to north**

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**Dickens Yard development from Ealing Town Hall roof**





**Dickens Yard development from east viewed beside  
Christ the Saviour Parish Church**

- 3.11 New Broadway has very wide footways and mature trees on the northern (application site) side of the road.
- 3.12 Photographs and illustrations of the site (interior and exterior) and surroundings are included in the accompanying Design & Access and HIA).

## **4.0 PLANNING HISTORY**

- 4.1 As set out at para 2.5 there is no planning history on the application site that is of direct relevance to the current proposal. The history and chronological development of the building pre-date modern planning controls so these are set out in detail in the accompanying HIA and Archaeological Desk Top Study.
- 4.2 It is of relevance to briefly examine the planning history of the nearby development site of Dickens Yard to the north of the site and Filmworks site to the south across New Broadway as these set a context for the current proposal.
- 4.3 Unsurprisingly, Dickens Yard has an immensely complicated planning history which stem from the 2009 permission (reference 2008/D156) for a very large scale mixed use scheme including residential flats, retail, (a small amount of offices) health spa and community uses in a range of buildings of up to 14 storeys in height.
- 4.4 The parts of Dickens Yard closest to the application site are complete whilst work continues to the east closer to The Christ the Saviour Parish Church.



**Relationship to Dickens Yard**



**Rear of Ealing Town Hall and Dickens Yard**





**Views of Dickens Yard development immediately to north of Ealing Town Hall**





**Views of Dickens Yard development from Ealing Town Hall roof**









## **5.0 PROPOSALS**

- 5.1 The application follows the brief approved by the Council as landowners to refurbish the retained parts of the building and provide a new 120 bedroom boutique hotel in the remainder together with a ground, mezzanine and up to 5 storey extension in the central part of the site to replace areas of the existing building be demolished.
- 5.2 As set out in the following section and Design & Access Statement the scheme has been reduced from the original draft of 140 rooms with an extension of up to 6 storeys to the current proposal of 120 rooms with a maximum extension height 5 storeys with significantly revised form to ensure that there is no visual impact to New Broadway and the Town Hall front façade.
- 5.3 The submitted demolition plans DEM01-09 show the central parts of the building that are to be demolished in order to create space for the hotel bedrooms extension. The HIA analyses and considers the parts of the building to be lost and concludes that this is acceptable as part of the overall scheme. The areas to be lost are shown in the HIA to be part of the original 1888 scheme but also a combination of later phased additions. There is no loss of the imposing front façade.
- 5.4 The Council is to retain the eastern part of the retained building at ground, first and second floor levels including the Marriage Room and Council Chamber together with other meeting and civic spaces. The scheme provides a new universal access arrangement into the building for users unable to negotiate the front steps gives lift access into the civic area reception.
- 5.5 The hotel utilises the basement (for fitness area, meeting rooms and back of house areas) and remainder of the retained ground floor (meeting rooms, dining and back of house).
- 5.6 The hotel extension takes approximately an “I” shape form behind the retained frontage building and in between retained wings up to the east and west. The extension starts at basement level with the front section of the “I” shape now reduced to only 3 floors above mezzanine level with the top floor only half the depth so that it is now both the same height as, and set back from the retained frontage range to New Broadway. The reduction to this level from the earlier schemes ensures that it is the historic frontage range that dominates views from New Broadway.
-

- 5.7 The rear section of the “I” shaped form fronts onto Dickens Yard at the rear and is opposite the much taller structures of Apsley House and Belgrave House (as shown on section BB, Plan A6.I30/P12). This section comprises 5 floors plus roof top plant enclosures above mezzanine level as befits it’s position opposite the much taller modern development to the north. The top of this rear section can only be glimpsed in some views from New Broadway as viewing angles and the separation of 15m mean that it is masked by the retained historic frontage range
- 5.8 As settled in the competition/selection proves the scheme combines refurbishment and restoration of the retained heritage buildings with sharp contemporary design for the extension. This allows the New Broadway and Longfield Avenue frontages to remain as existing whilst the new Dickens Yard frontage and ground floor treatment can complement the very different context to the north.
- 5.9 The proposal provides no on-site car parking but does provide a service bay off Longfield Avenue and also provides internal cycle storage for staff and external cycle storage for guests. The accompanying Car Park Management Plan and Travel Plan & Access Statement set out the accessibility credentials of the site, servicing and the availability of easily accessible nearby public parking.
- 5.10 The scheme provides 12 u/a adapted hotel bedrooms (ground, mezzanine 2, first 2, second 2, third, fourth and fifth 3.)
- 5.11 The hotel and its operation are described in greater detail in the accompanying Design & Access Statement and Hotel & Public Use Management Plan.

## 6.0 PLANNING POLICY

### Development Plan

6.1 The Development Plan consists of:

- The London Plan (2016) (LP)
- Ealing Development (Core) Strategy (2012) (DCS)
- Ealing Development Management Development Plan Document (2013) (DMDPD)
- Ealing Development Sites Development Plan Document (2015) (DSDPD); and
- Central Ealing Neighbourhood Plan (2017) (CENP)

6.2 As these documents are relatively recent, they should be accorded significant weight in determining the application.

6.3 As the Draft London Plan with minor suggested changes (2018) does not form part of the Development Plan and is subject to debate it should not be accorded any weight in determining this application.

6.4 The assessment below demonstrates how the scheme meets the provisions of the Development Plan. Section 8 deals with detailed considerations that are relevant to the determination of the application.

### Ealing Local Plans

#### Development Core Strategy (DCS)

Policy Test	Response	Compliance
1.1 – growth strategy for Borough, direct appropriate development to corridors inc. Uxbridge Road (inc. Ealing town centre)	Site is located within Ealing town centre with PTAL 6A, sustainable design, encourages multi-purpose trips, enhances vitality and viability, brings socio-economic benefits. See Air quality Assessment	Yes
2.5 – promotion of Ealing town centre, attract new businesses, enhance heritage assets, high quality buildings with coherent townscape.	Well designed, sustainable scheme, new facility for centre, enhances heritage assets, enhances & retains civic functions.	Yes

**Development Management DPD (DMDPD)**

<b>Policy Test</b>	<b>Response</b>	<b>Compliance</b>
4.5 – new hotel schemes directed to town centres.	Site located in Ealing town centre, site has PTAL 6A.	Yes
5.2 – non-commercial development to achieve BREEAM “very good” or better.	As set out in the Energy Report the hotel will perform well in terms of carbon saving but the nature of the scheme with retention and redevelopment of the heritage structure make application of BREEAM inappropriate	N/A
7B –high quality design, “coherent” development	The scheme provides a very high quality of design using carefully considered materials and detailing to successfully integrate with the retained heritage asset, sits comfortably in the Broadway and longer view streetscenes with minimal impact whilst complementing the contrasting character of Dickens Yard.	Yes
7C – protection of heritage assets	The scheme was selected in a competition process and has then been adapted following extensive engagement with the Council and Historic England to an agreed design solution that minimises impact on the heritage assets.	Yes



7.7 - tall buildings	The proposal is less than 30m in height, is significantly lower than new development to the north and “steps down” on a transition between Dickens Yard and New Broadway.	Yes
7.12 – identifies the Town Hall as a heritage asset not to be compromised or detracted from.	As set out in the D+AS the scheme has been the subject of design review to achieve agreement with Historic England. The illustrations also show the carefully designed setting back and reduced scale of the southern part of the extension have successfully achieved very limited impact of the scheme in identified critical views. The illustrations also show how the Dickens Yard development is already visible from many viewpoints setting a contemporary context for the Town Hall in a thriving modern town centre.	Yes

### Development Sites DPD (DSDPD)

Policy Test	Response	Compliance
Strategy for Ealing – The Town Hall site is not identified, but need for investment and the need to widen and enhance vitality of the centre is recognised including the need to provide new leisure facilities.	Availability of the site was not anticipated at the time DSDPD was written but it is clear that the site has the potential to meet some of the objectives and aspirations for the town centre.	Yes

## Central Ealing Neighbourhood Plan (CENP)

Policy Test	Response	Compliance
Vision – desire to create “distinctive, welcoming place ....” provides opportunities afforded by Cross Rail.	A new hotel offer has obvious potential to welcome and attract people, the development of the Town Hall site offers a very distinctive facility and the opportunity to make the most of Cross Rail links into Ealing and onto Central London for hotel users are obvious.	Yes
E3 – encourage mixed use in large scale schemes.	The proposal is a mixed use scheme as it refurbishes the retained areas for civic uses as part of the Council’s own reorganisation of its facilities as well as the mixed nature of facilities provided in the hotel with accommodation, restaurant, leisure and meetings.	Yes
E4 – encourage new business	The applicant’s hotel will be a new business to the town centre.	Yes
HBE1 – protection of heritage assets	The scheme has been carefully and sensitively designed to respect and protect the character and interest of the Listed Building and Conservation Area, as now accepted by Historic England.	Yes
HBE2 – complement the townscape and Conservation Area and protect/enhance key views.	The D+AS includes illustrations of the proposal in identified key views to demonstrate that there is no adverse impact, indeed no impact at all in some instances as the scheme	Yes

	is masked by existing buildings, in other instances visible parts are viewed against the backdrop of taller development in Dickens Yard.	
HBE3 - building heights in The Conservation Area buildings in excess of 6 storeys to be set back.	The proposal only comprises ground, mezzanine and 2 storeys (above basement) in the frontage to New Broadway even then this is set back behind and masked by the retained Listed Building, the taller ground, mezzanine and 5 storeys part of the extension is set even further back into Dickens Yard where it is significantly lower than the adjoining new flat developments.	Yes

### London Plan 2016

Policy Test	Response	Compliance
3.2 – Health Impact..	See Air quality Assessment. The proposal would not result in any harm to air quality.	Yes
4.5 – Encourage new hotels in appropriate locations, 10% of rooms to be u/a adapted.	Ealing town centre location, PTAL 6A, 10% u/a rooms provided.	Yes
5.1/5.2 – reduce carbon emissions, Be Lean, Be Clean, Be Green.	See Energy Report, 37% carbon reduction exceeds 35% target without inclusion of renewables (Be Lean, Be Clean, Be Green all analysed).	Yes
5.3 – Sustainable design & construction.	See Energy Report, 37% carbon reduction exceeds 35% target without inclusion of renewables	Yes

	(Be Lean, Be Clean, Be Green all analysed). See Air quality Assessment	
5.11 – green roofs	Green roof included.	Yes
6.1 – uses with high level of trips to locate in good public transport locations, discourage private car use.	See Travel Plan and Access Statement Ealing town centre PTAL 6A, no site parking provided.	Yes
6.5 – cross rail funding	The site is within the Ealing town centre zone.	Yes
6.9 – cycle parking	Public (external) and staff (internal) cycle parking provided.	Yes
Table 6.2 – parking provision	PTAL 6A – no on-site parking provision.	Yes
7.1 – contribute to sense of place, design to respect context reinforce & enhance character etc.	See Design & Access Statement. Well considered design for the context that enhances the retained civic use and provides a new facility including interaction with Dickens Yard.	Yes
7.2 – good design and provide positive contribution to area.	See Design & Access Statement. Overall design approach follows lead approved by Council in selection process, detail of the design has been negotiated, reviewed and agreed with Historic England.	Yes
7.7 – tall buildings	The proposal does not exceed 30m in height and is substantially lower than adjoining new developments.	Yes
7.8 – protection of heritage assets	The scheme provides new investment to refurbish and revitalise the retained heritage	Yes

	asset and the scheme has been generally agreed by Historic England. These conclusions are supported by the accompanying HIA.	
7.9 – assessment & reuse of heritage assets.	The HIA and Archaeological report fully assess the Heritage assets, supported by the Gazetteer prepared by ABA. The scheme respects the assets and results in “less than substantial harm” which is outweighed by the recognised public benefits of the scheme.	Yes

## National Planning Policy Framework

### Sustainable Development

- 6.5 The National Planning Policy Framework (NPPF) was first published in March 2012, and revised in July 2018. It sets out the Government’s intention for the planning system to contribute to the achievement of sustainable development, performing an economic, social and environmental role. Paragraph 11 states the presumption in favour of sustainable development which means that Councils should:
- Approve development that accords with an up-to-date development plan without delay; or
  - Grant permission where the development plan is absent, silent or relevant policies are out-of-date unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits when assessed against the Framework as a whole or specific policies in the Framework indicate that development should be restricted.
- 6.6 At the heart of the NPPF is a presumption in favour of sustainable development. There are three dimensions to sustainable development which are; economic, social and environmental. With regard to the economic role, there is a need for planning to

contribute to building a strong, responsive and competitive economy. Investment in business should not be over-burdened by planning policy expectations.

### **Strong Economy**

- 6.7 Section 6 of the NPPF addresses the role that planning has in building a strong and competitive economy. Paragraph 80 states that both planning policies and decisions should ‘help create the conditions in which businesses can invest, expand and adapt’ and that significant weight should be placed on the need to support both economic growth and productivity.
- 6.8 Paragraph 92 of the NPPF supports the development of social, recreational and cultural facilities that serve the needs of the community. Planning policies and decisions should plan positively to allow for community facilities and services that ‘enhance the sustainability of communities and residential environments’.

### **Town Centre Uses**

- 6.9 Hotels are identified as a “main town centre use”, such uses are strongly encouraged to locate within town centres and locations that enjoy good levels of accessibility. Proposals located outside of town centres on allocated sites are required to pass a Sequential test.
- 6.10 Main town centre uses are recognised as being able to contribute toward the vitality viability of town centres and Councils are encouraged to allocate appropriately identified sites.
- 6.11 It is recognised that any application of parking standards needs to take account of individual site circumstances and the general desire to reduce reliance upon the private car as a mode of transport. New proposals should be located to minimise reliance upon the private car and maximise opportunities to use other modes of transport.

### **Design**

- 6.12 Good design is encouraged and acknowledged as a key aspect of sustainable development and extends beyond visual attractiveness to also include sustainability measures, sense of place, integration into context and many other factors. Whilst good design is encouraged, controls should not take the form of simply imposing one stylistic form over an alternative.

## **Conserving and enhancing the historic environment**

- 6.13 This Planning Statement refers to the Heritage Impact Statement that has been prepared by Cotswold Archaeology in accordance with paragraph 189 of the National Planning Policy Framework. This States:

“In determining applications, local planning authorities should require an applicant to describe the significance of any heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets’ importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.”

- 6.14 The concept of the setting of a heritage asset is defined in Annex 2 of the ‘Framework’ in the following way: ‘Significance’ (for heritage policy)’ is defined as: “The value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic or historic. Significance derives not only from a heritage asset’s physical presence, but also from its setting”
- 6.15 Paragraphs 195 and 196 make a distinction between proposed developments that will lead to ‘... substantial harm to or total loss of significance ....’ of a designated heritage asset (paragraph 195) and proposals which will have ‘... less than substantial harm ....’ (Paragraph 196). Both of these paragraphs require that any harm should be weighed against the public benefits of the proposed development (or, in the case of paragraph 195) that other criteria apply.

## **Positive Discussions**

- 6.16 Paragraph 38 of the NPPF sets out that local planning authorities should approach all decisions in a ‘positive and create way’. Where possible decisions at all levels should ‘seek to approve applications for sustainable development’.

- 6.17 Planning obligations should only be used where necessary controls cannot be exercised through conditions and where the requirements imposed are necessary, directly related and proportionate to the proposal.

### Summary

Policy Test	Response	Compliance
Main town centre use, locate in town centre.	Town centre location.	Yes
Para 134 “less than substantial harm” weigh against public benefits	Limited extent of harm acknowledged by Historic England. Council agrees that harm is less than substantial therefore the substantial benefits to public – new use for buildings, investment in refurbishment, increased accessibility, socio economic benefits and enhanced civil facility should be weighed favourably	Yes



## **7.0 INVOLVEMENT**

- 7.1 The scheme is unusual as it has been selected in competition process by the Council themselves, hence there has been close dialogue from the very earliest stages of the scheme.
- 7.2 Following selection of the applicants as developers for the site discussions with the Council switched to their planning function role together with independent heritage expertise provided by Historic England.
- 7.3 Early drafts of the scheme were not agreed by the Council as planning authority as there was concern about the scale/height of the southern frontage section of the “I” form extension, some of the detailing and the level of detail to be included in the submission package.
- 7.4 The applicants have worked with the Council as planning authority and with Historic England to agree revisions to the early draft and the currently submitted scheme comprises a scheme including those revisions. A copy of the Historic England letter is attached as Appendix 2. Historic England recognises that there is some inevitable harm to the significance of the Listed Building and Conservation Area they go on ... “we do not consider this harm to be sufficient to raise an objection to these proposals..... we also recognise that the proposal uses for the building will allow many of the highly significant interior spaces to remain largely unaltered and in active”. Subject to some refinement and provision of additional detail it is advised that there is no further need for pre-application consultation. On that basis it is taken that Historic England regard the correct NPPF test to be para 134, i.e. that the proposal results in “less than substantial harm”.
- 7.5 A copy of the final pre-application advice that has been provided by the Council in October 2018 is attached in Appendix 3. The executive summary states:

“London Borough of Ealing (LBE) Cabinet resolved to seek alternative uses and developer procurement for Ealing Town Hall (ETH) and to select your Client Mastcraft, an established hotel operator, as the preferred bidder, who will provide this development. The conversion of ETH, a Grade II listed Landmark building in the Ealing Town Centre Conservation Area, to provide a hotel with shared community facilities and Democratic

Services for LBE is therefore agreed in principle but is still subject to assessment by the planning process in the normal way. The Town Hall is also an Asset of Community Value (ACV)

In conjunction with the new use, works of demolition, alteration and extension are proposed, that have been the subject of extensive discussion including with Historic England (HE), who have no objection in principle. Further, you have conducted a community consultation during the currency of this pre-application process. The outcomes of that process have been incorporated into scheme refinements and are referred to in your Statement of Community Involvement (SCI).

The design ethos and scale of development overall, including its' height, is considered to be generally sympathetic and appropriate to the location. The harm to heritage assets is deemed to be less than substantial. In applying the Planning Balance in accordance with statute, policy and case law, the public benefits of the development are considered to outweigh the harm.

The development of the Landmark Town Hall building in this key Civic Quarter location, so close to the Filmworks and music/theatre heritage of Ealing centre, provides a unique and exciting opportunity for your Client to fully integrate into this vibrant community. It is hoped that Mastcraft will want to make best use of the synergy it will inevitably draw and become an active participant and supporter in local activities and the facilities it will be able to offer in order to promote this cultural heritage."

- 7.6 The pre-application advice of October 2018 also included a number of minor concerns. These have been addressed in detail within the application submission. The detail of how these issues have been addressed are included in a letter to the Council dated November 2018. This letter is reproduced in full in Appendix H of the Design and Access Statement.

## **8.0 ASSESSMENT**

8.1 The main determining issues are:

- a) Principle of the Proposed Hotel Use;
- b) Impact on the Character and Appearance of Heritage Assets (see section 9.0);
- c) Impact on the character and appearance of the area; and
- d) Impact on the amenity of adjoining Neighbours.

8.2 All of these issues are considered in detail below except for the Impact on the character and appearance of Heritage Assets which is considered in section 9. Also of relevance, to the determination is section 10 which sets out the planning balance and public benefits which are significant and clearly outweigh any harm that results.

### **Principle of the Proposed Hotel Use**

8.3 The proposed hotel is a “main town centre use” as defined in NPPF. The site is located within the town centre as defined in The Local Plan.

8.4 Policy 4.5 of the London Plan supports London’s visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision especially in outer London and ensure that new visitor accommodation is in appropriate locations.

8.5 Core Strategy Policy 2.5 seeks to Revitalise Ealing Metropolitan Town Centre with two criteria relevant to the application: first, that development must protect and enhance the existing townscape and historic character; and second that revitalisation should include a comprehensive range of cultural, heritage, social, sport and leisure facilities, including refurbishment of Ealing Town Hall to provide a new landmark focus for civic, community and cultural activities with a boutique hotel.

8.6 Not only is the site within a town centre it is in a location with excellent public transport accessibility and it is recognised as one of London’s Metropolitan Centres.

8.7 Hotels are widely recognised to bring significant economic benefits by creating (usually locally based) employment, capturing visitor spend and assisting local business by accommodating visitors. As in the current instance hotels provide further benefits by

providing restaurant and meeting facilities of value to the local community including the business community.

- 8.8 In seeking a development “partner” for the site the Council invited interest; all of the short listed parties proposed hotel uses to operate alongside the retained civic functions. The Council (albeit not as local planning authority) recognised the suitability of the site and its compatibility with hotel use in accepting the applicant’s proposal.
- 8.9 The proposed use as a boutique hotel would be in accordance with the Council’s policies for the revitalisation of Ealing Town Centre and therefore the proposed use of the site would be acceptable in principle.
- 8.10 As set out elsewhere, the proposal meets sustainability criteria, furthermore, it takes the highly sustainable approach of adapting and re-using the existing building so far as possible.
- 8.11 The proposal comprises appropriately located sustainable economic development and benefits from the presumption in favour of approval set out in NPPF.

#### **Impact on the character and appearance of the area**

- 8.12 Separate to the impact on heritage assets (that is considered in detail in section 9), the development should not result in harm to the character and appearance of the area such that it responds positively to the character of the surrounding area (London Plan policies 7-1 to 7.6) and to contribute to a sense of place and in their design to reinforce and enhance the main Town Centre and civic character (DCS policy 2.5).
- 8.13 The proposed scheme would enhance the local area as indicated by the Council’s pre-application response. This states:
- “The provision of a secondary DDA access on the east side of the building to Dickens Walk, giving access to the retained Democratic Services area, is a welcomed addition. Providing active frontages to Dickens Yard and Uxbridge Road will help to integrate the hotel use better in the town centre but careful attention will be needed in relation to external furniture, lighting and signage.”

- 8.14 Also of relevance is the issue of whether the proposed development would significantly change the skyline as set out by DMD policy 7.6 and CENP policy HBE3. As the development would be screened by surrounding development it is considered that it would not have a significant impact on the skyline in accordance with the development plan.
- 8.15 The Council supports the design and scale of development. Further details have been provided that provide clarity regarding the design approach. Overall, the pre-application advice states:

“The principle of a hotel here complies with spatial policy objectives of the development plan. An extension to provide the bulk of the hotel guest rooms is the optimal approach to incorporate this fundamental component with the protection of this heritage asset. DMD para. E7.7.1 requires therefore the primary consideration for any scheme is that it makes a positive contribution to the urban environment.”

“..the new building form overall demonstrates the capacity to secure a high quality, exemplary design that responds well to its location, enabling the scheme to achieve the level of quality and a sustainable development required by the NPPF and Development Plan.”

### **Impact on the amenity of adjoining Neighbours**

- 8.16 The main impact of the development on the amenity of adjoining neighbours would be from the extension to Ealing Town Hall and the residential properties at Belgravia House and Aspley House. Policy 7B of the Ealing DMD seeks that new development must achieve a high standard of amenity for users and for adjacent uses. Development plan policies and guidelines promote high standards of design that minimise loss of privacy mainly in relation to opposing dwellings.
- 8.17 In terms of Belgravia House and Aspley House, the Council’s pre-application advice states:

“In this case they are hotel room windows facing flats and the separation distance will be generally 11m to the flank of Belgravia House and the podium amenity space. I have no feedback to date from your community consultation how much of an issue this is for residents. However this separation is similar to other residential blocks on Dickens Yard and is therefore considered acceptable in principle.”

8.18 In terms of the impact on the privacy of other residential properties including Fitzroy Apartments and 18-36 Uxbridge Road, the Council's pre-application advice states:

“Overall however it is not considered the extension will give rise to an unacceptable loss, or the perception of loss, of privacy or amenity between existing residential accommodation and upper floor hotel guest rooms.”

8.19 To support the application a detailed Daylight, Sunlight and Shadow assessment has been submitted. This concludes that the proposed development would not give rise to any significant impact on adjoining residents.

8.20 Overall, given the distance to adjoining properties the proposed development would not result in any significant harm to the amenity of adjoining residents by reason of a loss of privacy, sunlight or daylight. On this basis the proposal would be in accordance with policy 7B of the Ealing DMD.

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## **9.0 IMPACT ON CHARACTER AND APPEARANCE OF HERITAGE ASSETS**

- 9.1 In assessing the impact on the character and appearance of Heritage Assets, the relevant policy is 7C from the Development Management DPD (2013). This states that development of heritage assets: should be based on an assessment of the significance and the impact on that significance, should conserve significance, should protect and where appropriate restore original or historic fabric. A similar approach applies to development within or affecting the setting of Conservation Areas.
- 9.2 In assessing the impact on significance, the NPPF in paragraphs 193 to 202 provides a three-tiered approach to summarise the ‘scale of the harm’.
- Substantial harm: defined as a serious change that from its alteration or destruction, or from development within its setting’ (paragraph 194)
  - Less than substantial harm (paragraph 195); and
  - No harm (or ‘preservation’), such that the attributes identified within the Statement of Significance of a heritage asset have not been harmed.
- 9.3 The Heritage Impact Statement defines the significance of the building as follows:
- “The heritage significance of Ealing Town Hall (including its special ‘architectural and historic interest’, as per the 1990 [Listed Buildings and Conservation Areas] Act) can be summarised as follows:
- The multi-phase façade of the building (see Fig 3) including the initial 1888 phase, as well as the later two elements dating to the earlier 20th-century (1913 and 1930);
  - Its west-facing façade (e.g. including Victoria Hall) is largely as Jones designed it, and was intended to be viewed from the adjacent road and pavement;
  - It is arguable that Jones’ original 1888 building is the most significant, the later extensions essentially copying or continuing the earliest phase, and of less architectural interest as a consequence (e.g. later dates);
  - Its later phases reflect the need for rapid expansion as a result of a rapidly growing local authority area, but also greater legal responsibilities;

- It is a striking example of later Victorian neo-Gothic Town Hall design, but is not architecturally notable when contrasted with earlier, more lavishly decorated examples elsewhere in the country;
- Historic building development to the centre, rear of the Town Hall itself is of several phases and quite erratic in execution, but spatially explicable given the need to maximize both space and daylight within a constrained footprint, as council functions developed and more space was required;
- The internal historic and architectural fabric is of mixed evidential value, partly because of the original nature of the detailing and décor, but also because of later additions and alterations;
- Key rooms and areas of architectural interest includes the Victoria Hall, the Council Chamber, the Nelson Room, and the lobby, staircase and upper landings associated with the 1888 main entrance, and those same stair-hall elements in the 1930s extension; and
- The Town Hall frontage contributes to the character and appearance of the Ealing Town Hall Conservation Area principally through its neo-Gothic design, mass and position on Ealing Broadway (see Section 6 and 7).” (paragraph 4.57)

9.4 The proposed development comprises four main elements:

- The demolition of earlier structure, rooms and areas to the centre, rear of the Town Hall, to allow for new work in this part of the existing building;
- The enhancement of interior décor and interfaces between existing and proposed new work, as part of the new hotel development;
- The alteration of existing rooms and areas to allow for new functions as part of the hotel and related development; and
- The insertion of discrete new facilities to allow for disabled access, and the better functioning of areas within the hotel and Town Hall – e.g. the incorporation of service lifts between kitchens and restaurant areas

9.5 The development therefore has an impact on Ealing Town Hall by reason of both the external and internal works but also has a wider impact on other Heritage Assets such as the Ealing Town Conservation Area, and adjoining/ adjacent Listed Buildings/ Locally Listed Buildings.



## **On Ealing Town Hall of the: External Works, Internal Works and Extension**

### **Lift**

- 9.6 The insertion of a disability compliant Equality Act (EA) access entrance in the eastern flank of the current entrance lobby, will require the construction of a chair lift. The Council's pre-application advice indicates that:

“This will likely cause harm to the historic fabric, although drawings P19 and P20 indicate an appropriately sympathetic approach will be taken to the creation of the EA compliant access entrance. These alterations have been provisionally agreed to by Historic England and LB Ealing Officers. The applicant will need to provide more detailed drawings of the interior and exterior alterations which this change will entail, given the significance of the eastern elevation and entrance lobby which will be affected. Whilst accepted in principle, the acceptability of the scheme will rely in part on the detailed design of these interventions. (paragraph 6.2 of the advice from Alan Baxter Ltd)”

- 9.7 Further detailed drawings have now been provided on drawings P19.A and P20.B which now also show the existing and proposed internal elevations. The platform lift is shown with ironwork to match the railings. Given this, it is considered that the harm will be less than substantial.

### **Victoria Hall**

- 9.8 The impact on the Victoria Hall is primarily from the demolition of the easternmost bay, currently forming part of the stage area and concealed behind a later proscenium arch and the construction of a two-storey range in the place currently occupied by the stairway on the north exterior elevation of the Hall.

- 9.9 The Council's pre-application advice indicates that:

“The demolition of the easternmost bay, ..... has been agreed in principle by Historic England and LB Ealing Officers, but one element of this alteration that requires detailed consideration is the relocation of the eastern rose window. The proposal, which sees the window dismantled and relocated more prominently and with artificial backlighting within the Hall, will require a method statement detailing the method for

dismantlement and the process by which this relocation would take place to provide evidence that this can be done appropriately and successfully. This method statement should be provided as part of the Listed Building Consent (LBC) application.

(Paragraph 6.3 of the advice from Alan Baxter Ltd)”

- 9.10 Paye Stonework confirm that the rose window can be successfully relocated. A method statement is submitted as part of the application. It is difficult to provide significant detail as the method will need to take account of the condition of the stone once work commences. The method can be conditioned if necessary. Given this, the harm would be less than significant.
- 9.11 The Council’s pre-application advice indicates that:
- “This would conceal a decorative terracotta relief panel in the third window bay in from the east elevation. It is necessary to clarify whether this terracotta panel will be reinstated in the blank space further along the Hall’s north elevation, as indicated in drawing P17, or if it will become an internal feature and a new panel inserted in the blank space. (Paragraph 6.4 of the advice from Alan Baxter Ltd)”
- 9.12 The decorative terracotta panel from the third bay will be relocated to the blank bay and the new terracotta panels will be decorative to match. This is now indicated on drawing P17 revision C. Drawing P16 revision B amended to show decorative terracotta panel on western return wall. Given this, the harm would be less than significant.

### **Internal Works**

- 9.13 The proposal involves the alteration of existing rooms and areas to allow for new functions as part of the hotel and related development. The building has a number of important fixtures and fittings that will be retained as part of the conversion. These were originally identified in Alan Baxter Ltd’s Heritage Gazetteer (March 2018). The Council in the pre-application advice (paragraphs 6.6 to 6.9 of the advice from Alan Baxter Ltd) has raised concerns regarding the level of detail including the new partition in the Queens Hall.
- 9.14 Details of the works to the Queens Hall are now shown on drawing P22B and a comprehensive Method Statement & Heritage Schedule has been produced by ADZ Architects comprising the following documents;

- i) Existing floor plans highlighting Heritage items with cross reference to Inventory prepared by London Borough of Ealing
- ii) Town Hall Inventory identifying items to be decided, to be recycled, retained fixtures and items to be kept. This is accompanied by cross referenced photographs
- iii) Town Hall Inventory- Democratic Wing, identifying items to be decided, to be recycled, retained fixtures and items to be kept. This is accompanied by cross referenced photographs.

9.15 It is considered that enough detail has now been provided to demonstrate that the proposal would only have less than significant impact.

#### **Extension**

9.16 The concerns regarding the impact of the new building on the retained listed building are considered in detail in the pre-application advice from Alan Baxter Ltd in paragraphs 7.5 to 7.10. Revised drawings P10B and P23B address these concerns.

9.17 Overall, the HIA concludes in relation to the impact of the extension:

“In terms of impact upon historic fabric it is considered that whilst the proposed remodelling is extensive, the affected historic fabric is of mostly modest significance which does not contribute to the special interest of the Listed Building. Detailed attention has been focused upon the eastern-most bay of the Victoria Hall, and also the staircase to what was the original south-eastern corner of Jones’ initial design. (paragraph 9.2 of the HIA by Cotswold Archaeology)”

#### **On Ealing Town Hall and on Ealing Town Centre Conservation Area of the: New Extension**

9.18 The Town Hall within the Ealing Town Centre Conservation Area is extremely important. Policy 7.12 of LB Ealing’s Development Management DPD, ‘Ealing Local Variation – Implementing the London View Management Framework’, identifies Ealing Town Hall as one of fifteen borough-wide ‘Landmarks’ and states that ‘Proposals for the development of designated Landmarks should not compromise or detract from those elements that make them important as landmarks’ (LB Ealing, December 2013)

- 9.19 To support the application various visualisations have been submitted. These show how the changes to the building will be seen from within the Conservation Area. Pre-Application advice from Alan Baxter Ltd comments as follows:

“The visualisations of the proposed development indicate that the new extension is generally concealed from view behind the retained listed building. Where it is visible, its impact is significantly lessened by its setting seen against the taller Dickens Yard development to the north of the Town Hall.” (Paragraph 8.2).

- 9.20 In addition, concerns are raised regarding the view from New Broadway including northerly views of the clock tower. The analysis concludes that:

“However, northern views of the Town Hall and its clock tower have always been less significant, secondary views compared to views from the south, in particular from New Broadway. Furthermore, northerly views of the clock tower are not defined as key views in the Conservation Area Appraisal (LB Ealing, 2007). Therefore, although the loss of this view would harm the significance of the building, this harm appears to be less than substantial given the historic context of northern views as subordinate to the key views from New Broadway.” (Paragraph 8.4)

### **On Other Heritage Assets**

- 9.21 In assessing the impact of the proposal it is necessary to assess the impact of the development on adjoining/ adjacent Listed Buildings/ Locally Listed Buildings. The map below shows how the site relates to several Locally Listed and Listed Buildings.



Extract from Ealing Town Conservation Appraisal – dots indicate Locally Listed Buildings and Stars indicate Listed Buildings

9.22 The important buildings are:

- Numbers 14-36 New Broadway are a locally listed parade of Edwardian shops directly to the east of the Town Hall;
- The former Empire Cinema, opposite the Town Hall (Filmworks development);
- The Parish Church of Christ the Saviour (Grade II\*) lies to the east of the Site along New Broadway;
- Ealing's locally listed Victorian fire station lies to the north of the Site; and
- Numbers 15-31 New Broadway are a locally listed parade of Edwardian shops that lie to the southeast of the Town Hall.

9.23 Given that the impact arises from the extension to the rear of the town hall, there would be very limited impact on the above heritage assets. Alan Baxter Ltd states that he considers there to be no harm.

## Conclusion

- 9.24 The Council's concerns at pre-application have been addressed through updated drawings and information. Based on the information that was submitted the Council concluded that the harm would be "less than substantial". The agrees with the conclusions of the HIA that are set out below:

"Externally, the historic fabric of the important facades of the Town Hall, namely those to the south and west, will remain unaltered. These elevations are important as the building was designed so that the southern and western-elevation would be highly visible. Whilst the proposed development will alter part of the street scene within Ealing Town Centre Conservation Area, it will appear subservient to the historic elements of the building. The proposals are not considered to harm any of the important elements of the setting of the Listed Building, and the character and appearance of the Conservation Area will be preserved.

The proposed development is considered to equate to 'less than substantial harm' to the Grade II Listed Building, and this should be weighed against the public benefits of the proposals. It is considered that the elements of the Listed Building which contribute to its special interest are preserved, and therefore Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 is not triggered. (paragraphs 9.3 and 9.4)"

- 9.25 As the harm is less than substantial, the public benefits must therefore be weighed against this limited harm in accordance with paragraph 196 of the NPPF. The issue of public benefits and the planning balance is considered in detail in section 9. This concludes that the public benefits are clearly enough to outweigh any harm and therefore the proposal would not harm the character and appearance of heritage assets.

## **10.0 PLANNING BALANCE AND PUBLIC BENEFITS**

### **Introduction**

- 10.1 All Planning applications must be determined in accordance with sections 38(6) Planning and Compulsory Purchase Act 2004 which states: ‘..the determination must be made in accordance with the plan unless material considerations dictate otherwise’. The duty is therefore for the Council to exercise its judgement and consider many (sometimes) conflicting issues to decide whether planning permission should be granted. This will mean examining the development plan and taking material considerations which apply to the proposal into account. These things must be properly considered otherwise the decision of whether or not to grant permission may be unlawful. This process is often termed the “Planning Balance”.
- 10.2 Separate to the “Planning Balance” that applies to the overall determination of the application, paragraph 196 of the NPPF also has a “balance” when assessing whether a proposal would result in harm to heritage assets. In the analysis above in section 9, the harm on heritage assets is defined as less than substantial. The harm should therefore be balanced by “public benefits”. These are not as wide as the definition of “material considerations” so therefore not all material considerations will be public benefits.

### **Heritage Balance**

- 10.3 National Planning Policy Guidance states in relation to the harm to heritage assets that: ‘Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework.... Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. Public benefits may include heritage benefits, such as:
- sustaining or enhancing the significance of a heritage asset and the contribution of its setting
  - reducing or removing risks to a heritage asset
  - securing the optimum viable use of a heritage asset in support of its long term conservation.’

10.4 The public benefits that outweigh any harm to the heritage asset in terms of paragraph 196 of the NPPF, are considered to consist of:

- Fully developed and revitalised Town Hall will cater for a wide range of activities making it a real community hub, surrounded by Dickens Yard, Filmworks and Perceval House,
- Revitalised Town Hall will continue to accommodate all the Civic functions in a newly refurbished eastern wing, new DDA access and community-related functions in the remaining public areas of the high-quality hotel,
- The ground floor is re-planned to make it more permeable as a community hub, with access front-to-rear to a bistro fronting Dickens Yard,
- Victoria Hall will become a health and fitness club available to the community as well as hotel guests as well as for business or social functions, the Nelson Room available as a restaurant for hotel or visiting customers, the Telfer Room as a function room on the ground floor in conjunction with the main kitchen,
- Provision of a bistro,
- Cocktail bar in the hotel for guest and visitor use,
- Conservatory and roof terrace bar for hire,
- Hotel extension to replace haphazard low-level buildings,
- Public areas to incorporate state of the art technology,
- High quality hotel that will assure the long-term future of the Town Hall; and

10.6 The public benefits set out above clearly outweigh the impact. The proposal would therefore be in accordance with paragraph 196 of the NPPF.

### **Planning Balance**

10.7 The analysis in sections 6, 7 and 8 clearly demonstrates that the proposed development would be in accordance with the Development Plan in terms of Section 38 (6) of the Planning and Compulsory Purchase Act 2004. However, if any harm is identified this can be



balanced against other material considerations which as set out above are wider than the test in paragraph 196 of the NPPF.

10.8 In considering the planning balance, it is useful to set out how the proposal would achieve sustainable development. Sustainable development is defined in paragraphs 1 to 14 of the NPPF.

10.9 The proposed development would be sustainable development in the following ways:

- Economic objective - The proposed development involves significant investment that would create a viable business for an important building in Ealing. The development would support the growth of Ealing Town Centre with a use that is needed to support the wider economy of the area. The development would create 120 jobs.
- Social objective – The proposed development will provide facilities for the local community in the long term. In addition the hotel facilities will be available for the local community. This will support the health and cultural well-being of the local area.
- Environmental objective - The historic Ealing Town Hall will have a viable use and will provide significant community facilities. The proposed conversion is an efficient use of this building.

10.10 In addition to the benefits set out above, the benefits set out in paragraph 10.4 also apply when applying the planning balance. On this basis, planning permission should be granted.

## **Conclusion**

10.11 It is considered that the proposal meets the three dimensions of sustainable development in the ways set out above and in accordance with section 38 (6) of the Planning and Compulsory Purchase Act 2004 and would generate public benefits which should be balanced against any harm that is identified. Given that no harm if any results from the development, permission should be granted.

## **11.0 CONCLUSION**

- 11.1 The proposed development to this important Listed Building would support Ealing Town Centre and the wider local economy by providing for a successful hotel in this important building. One hundred and twenty staff will be generated by this development.
- 11.2 The scheme follows a Cabinet decision in 2016 where the proposed development was considered to generate significant benefits for the Council and community.
- 11.3 The proposal has been through extensive consultation with the community, the Council, and English Heritage. The result of this has been that the scale of development has been reduced and further detail has been provided to support the scheme.
- 11.4 The proposal would have less than substantial harm to Heritage Assets as demonstrated by the submitted HIA.
- 11.5 Overall, the proposals would accord with the Development Plan and the provisions of the NPPF such that planning permission and listed building consent should be granted.

## **Appendix 1 - English Heritage Listing**

You are here: [Home](#) > [More Detailed Search](#) > [Gateway Results](#) > [The National Heritage List for England Results](#)

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## List Entry Summary

This building is listed under the Planning (Listed Buildings and Conservation Areas) Act 1990 as being of special architectural or historic interest.

**Name: EALING TOWN HALL**

**List Entry Number: 1358791**

### Location

EALING TOWN HALL, NEW BROADWAY W5

The building may lie within the boundary of more than one authority.

**County:** Greater London Authority

**District:** Ealing

**District Type:** London Borough

**Parish:**

**National Park: Not applicable to this List entry.**

**Grade: II**

**Date first listed: 19-Jan-1981**

**Date of most recent amendment: Not applicable to this entry.**

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## Legacy System Information

The contents of this record have been generated from a legacy data system.

**Legacy System: LBS**

**UID: 200973**

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## Asset Groupings

This List entry does not comprise part of an Asset Grouping. Asset Groupings are not part of the official list and are added later for information.

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## List Entry Description

### Summary of Building

Legacy Record - This information may be included in the List Entry Details.

## Reasons for Designation

Legacy Record - This information may be included in the List Entry Details.

## History

Legacy Record - This information may be included in the List Entry Details.

## Details

NEW BROADWAY 1, 5010 W5 Ealing Town Hall TQ 18 SE 2/57 II 2, 1888 by C Jones in neo-Gothic style. Asymmetrical, faced in ragstone under a slate roof. Generally 2 storeys with 3 storey gabled entrance. Hipped centre bay. Off-centre tower with lancet windows setting back and terminating in a spirelet. Heavily towered entrance right added in 1930. Both sections of the building have good stairhalls with contemporary decoration.

Listing NGR: TQ1753880716

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## Selected Sources

Legacy Record - This information may be included in the List Entry Details

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## Map

### National Grid Reference: TQ 17538 80716

The below map is for quick reference purposes only and may not be to scale. For a copy of the full scale map see the attached PDF - [1358791.pdf](#) - Please be aware that it may take a few minutes for the download.



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This copy shows the entry on 19-Mar-2018 at 09:15:26.

## **Appendix 2 - Historic England letter dated 28th February 2018**



Historic England

LONDON OFFICE

Mr Nathan Blick  
Cotswold Archaeology  
41 Burners Lane South  
Kiln Farm  
Milton Keynes  
MK11 3HA

Direct Dial: 0207 973 3777

Our ref: PA00523866

Your ref: NOT FILED

28 February 2018

Dear Mr Blick

**Pre-application Advice**

**EALING TOWN HALL, NEW BROADWAY, LONDON W5 2BY**

Thank you for meeting with me on the 14th February 2018 and for sending through meeting notes and revised drawings relating to your proposals for part conversion of Ealing Town Hall to hotel use, retention of the 1930s range in Council use, and associated alterations and extensions. This letter follows on from our previous letters of advice dated 12th October 2017 and 13th December 2017.

We welcome the revisions to the proposals, which have been made as a result of pre-application discussions with ourselves and the LB Ealing. Whilst we still consider the proposals to cause some harm to the significance of the listed building and the surrounding conservation area, by virtue of the loss or alteration of historic fabric and the impact of what is still a large extension on the surrounding conservation area, we do not consider this harm to be sufficient to raise an objection to these proposals, if they were formally submitted for planning permission and listed building consent. We also recognise that the proposed uses for the building will allow many of the highly significant interior spaces to remain largely unaltered and in active use.

We would encourage you to further refine your proposals before submitting them for planning permission and listed building consent, including compiling an audit of heritage features, further details of associated alterations to historic fabric, including servicing and riser locations and further details on the design and materials for the proposed extension.

You do not need to consult us again on these proposals at pre-application stage unless, as the scheme develops, there are material changes to the proposals which would have an impact on the historic environment.

If you have questions regarding any of the above, please do contact me.



4TH FLOOR, CANNON BRIDGE HOUSE, 25 DOWGATE HILL, LONDON EC4R 2YA

Telephone 020 7973 3700  
[HistoricEngland.org.uk](http://HistoricEngland.org.uk)



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*Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.*



Historic England

LONDON OFFICE

Yours sincerely

Claire Brady  
Inspector of Historic Buildings and Areas  
E-mail: [claire.brady@HistoricEngland.org.uk](mailto:claire.brady@HistoricEngland.org.uk)

cc  
Henry Kennedy-Skipton, LB Ealing  
Zsolt Moldan, ADZ Architects  
Rosemarie Wakelin, LB Ealing  
Gregory Gray, LB Ealing  
Girish Sanger, Mastcraft

**EALING TOWN HALL, NEW BROADWAY, LONDON W5 2BY**  
**Pre-application Advice**



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*Historic England will use the information provided by you to evaluate any applications you make for statutory or quasi-statutory consent, or for grant or other funding. Information provided by you and any information obtained from other sources will be retained in all cases in hard copy form and/or on computer for administration purposes and future consideration where applicable.*



## **Appendix 3 - Ealing Council Pre-Application Advice**

# **Ealing Town Hall Hotel Proposal Pre-Application Response**

**Prepared for London Borough of  
Ealing**

**October 2018**

## **Ealing Town Hall Hotel Proposal**

### **Pre-Application Response**

#### **1.0 Introduction**

1.1 Alan Baxter Ltd have been appointed to provide independent pre-application advice on the proposed conversion, alterations and extensions of the Grade II listed Ealing Town Hall. The scheme seeks to provide a new hotel, whilst retaining democratic services and publically available facilities, on behalf of the London Borough of Ealing. The building is well-known to ABA, having previously been the subject of two pieces of conservation work for the firm – namely, a Heritage Audit in 2008 and a Heritage Gazetteer in 2018.

1.2 These notes have been prepared for LB Ealing. They provide comments in relation to pre-application proposals by ADZ Architects on behalf of Mastcraft, the proposed hotel developer. All references to drawings are those prepared by ADZ Architects.

#### **2.0 Pre-Application Site**

2.1 The application addresses a rectangular site occupied by Ealing Town Hall and bounded by New Broadway to the south, Longfield Avenue to the west, the Dickens Yard development to the north and a pedestrian footpath to the east. The present building is largely the result of three building phases of 1888, 1913 and 1930, with alterations of 1902-1911 and after 1945 completing the extent of works. The original phase of 1888, comprising much of the western section of the Site, was designed by the celebrated local architect, Charles Jones, who served for 50 years as Ealing local authority's engineer and surveyor.

2.2 The application Site's west, south and east elevations are unified in style and form, and have recently been identified as significant or highly significant elevations (Alan Baxter Heritage Gazetteer, 2018), while the north side is a far less unified conglomeration of both original buildings and recent extensions, comprising a mix of significant and detracting elements. The Site generally rises to two or three stories above ground level, with the exception of a large off-centre clock tower. The combination of the long, unified and uninterrupted frontage onto New Broadway and the prominent clock tower make the Town Hall an important local Landmark, as designated by LB Ealing Policy 7.12 – Ealing Local Variation: Implementing the London View Management Framework (LB Ealing, Development Management DPD, December 2013).

2.3 Ealing Town Hall is a Grade II listed building which occupies a prominent location within the Ealing Town Centre Conservation Area. There are also other heritage assets in the local vicinity, namely: the Church of Christ the Saviour (Grade II\*); the former Ealing Fire Station; nos. 14-36 and nos. 15-31 New Broadway; and the façade of the former Empire Cinema (all locally listed). Therefore heritage considerations are a material consideration in planning decisions relating to the proposed development.

### **3.0 Planning Policy Context**

3.1 This advice relates the current proposals to policy concerning heritage assets at local, strategic and national levels set out in the following documents:

- National Planning Policy Framework (NPPF), July 2018
- Greater London Authority's London Plan (LP), 2011 with minor alterations 2016
- Great London Authority's Draft London Plan (of emerging weight), August 2018
- The London Borough of Ealing's Development Management DPD, December 2013

3.2 The NPPF makes it clear that 'great weight' should be given to the conservation of a designated heritage asset, 'no matter what degree of harm is proposed', and that 'substantial harm to or loss of grade II listed buildings...should be exceptional'.

3.3 The current proposal entails a series of alterations and additions to Ealing Town Hall which impact upon the building's historic fabric, the Ealing Town Centre Conservation Area, and the setting of nearby heritage assets. Some of these changes are considered harmful to the Town Hall's significance. In this context it is relevant to note that ADZ Architects have carried out consultation with Heritage England (HE), who deemed the current proposals to be acceptable, although acknowledged that there will be harm to the building's significance (HE letter to LB Ealing, 28 February 2018).

### **4.0 Pre-Application Proposal**

4.1 The proposal entails the demolition of the central rear parts of the existing building and construction in its place of a six to eight-storey hotel of approximately "I" shape which will be integrated into the existing building with associated internal alterations. The proposed areas of demolition include part of the initial 1888 building phase, along with a combination of later phases of extension and alteration dating from 1902-11 and after 1945. The retained parts of the listed building will be used in two ways:

- a. The Council will retain occupancy of the eastern wing of the retained building, which includes the Council Chamber, for democratic services. This area is referred to as the Democratic Retained Property (DRP).
- b. The remainder of the retained building will be incorporated into the hotel design and its interior altered through a combination of refurbishment and restoration, as well as the relocation of historic fixtures. Public access will be maintained to a large proportion of the ground floor, including Victoria Hall, and to some spaces on the first floor, either by way of pre-arranged community booking of civic spaces or general public use of hotel facilities such as the restaurants and bars.

### **5.0 Documents Examined for Pre-Application Submission**

5.1 Pre-application Planning Policy and Background Statement (Walsingham Planning, April 2018)

- Architects Drawings (ADZ, September 2018)
- Built Heritage Impact Assessment (Cotswold Archaeology, March 2018)
- Gazetteer of Historic Building (Alan Baxter Ltd, March 2018)
- Design & Access Statement (ADZ, n.d.)
- Refinement of Proposals (ADZ, October 2018)
- Statement of Community Involvement (forty shillings, October 2018) – received on the date of issue of this response

## **6.0 Impact upon historic fabric**

### **a. External Works**

6.1 Externally, the proposals are to retain and refurbish the most significant elements and to replace the less significant rear portion. In terms of the treatment of the retained fabric, the proposals are, in general, sympathetic. The design positively addresses Ealing Local Policy 7C – Heritage by retaining ‘characteristic features’ of the Ealing Town Centre Conservation Area (as identified in Ealing Town Centre Conservation Area Appraisal, 2007), as the proposal will retain the highly significant west, south and east elevations.

6.2 The most prominent intervention in these areas will be the insertion of a disability compliant Equality Act (EA) access entrance in the eastern flank of the current entrance lobby, which will require the construction of a chair lift. This will likely cause harm to the historic fabric, although drawings P19 and P20 indicate an appropriately sympathetic approach will be taken to the creation of the EA compliant access entrance. These alterations have been provisionally agreed to by Historic England and LB Ealing Officers. The applicant will need to provide more detailed drawings of the interior and exterior alterations which this change will entail, given the significance of the eastern elevation and entrance lobby which will be affected. Whilst accepted in principle, the acceptability of the scheme will rely in part on the detailed design of these interventions.

6.3 Several changes are being proposed to one area of great significance, namely Victoria Hall. The demolition of the easternmost bay, currently forming part of the stage area and concealed behind a later proscenium arch, has been agreed in principle by Historic England and LB Ealing Officers, but one element of this alteration that requires detailed consideration is the relocation of the eastern rose window. The proposal, which sees the window dismantled and relocated more prominently and with artificial backlighting within the Hall, will require a method statement detailing the method for dismantlement and the process by which this relocation would take place to provide evidence that this can be done appropriately and successfully. This method statement should be provided as part of the Listed Building Consent (LBC) application.

6.4 A further change proposed to Victoria Hall is the construction of a two-storey range in the place currently occupied by the stairway on the north exterior elevation of the Hall. This would conceal a decorative terracotta relief panel in the third window bay in from the east elevation. It is necessary to clarify whether this terracotta panel will be reinstated in the blank space further along the Hall’s north elevation, as indicated in drawing P17, or if it will become an internal feature and a new panel inserted in the blank space.

6.5 Furthermore, the visualisation of this extension (PROPOSED VIEW 06) suggests that the new building will replicate these panels in its design but with no detailing presently depicted. These panels should be seen as an opportunity to recover an element of the Hall’s exterior detailing previously removed or concealed behind the later staircase and as such more information regarding these panels’ nature will be required for the full planning application.

### **b. Internal Works**

6.6 Internally, the proposals envisage the refurbishment of the historic interiors to support the proposed new uses. This includes the insertion of a full-height, folding partition in the Queen’s Hall. The current drawing illustrating this, Drawing P22, indicates that the design of the partition will be sympathetic to the existing timber wall panelling, but does not show enough detail with regards to how the partition will fold and how it will be attached to the existing timber panelling while minimising harm. Further information regarding this element of the design is required.

6.7 It is clear from the plans that a large programme of reorganisation of significant fixtures and fittings identified in Alan Baxter Ltd's Heritage Gazetteer (March 2018) will be carried out to enable the conversion of the retained building to be put to hotel and DRP use. The current suite of drawings note a small number of fixtures to be retained or relocated, such as the timber panelled screen on the south side of the axial ground floor corridor, but there is no information in the pre-application pack of documents regarding how these items will be treated during the work, for example if they are to be moved then reinstated.

6.8 Given the difficulty of illustrating the entire collection of relocated or retained fixtures in plan form, it is necessary to produce a comprehensive method statement, detailing the fate of significant fixtures identified in the Heritage Gazetteer. This will provide much-needed clarity regarding the extent of change within rooms of significance, such as the Nelson Room.

6.9 Similarly, more detail should be provided regarding the non-fixed elements identified in the Gazetteer, such as historic plaques. Drawing number P22 indicates that a memorial plaque in the DRP entrance lobby is to be placed above a new door and provided with a picture light. This will potentially be appropriate provided that this plaque's font style and size are readable at the proposed height.

6.10 A key element of this project will be the interfaces between the retained and new buildings, in particular from the eastern and western entrance lobbies, both significant spaces. Drawing number P21 deals with the transition from the retained axial corridor into the new hotel lobby, but there is insufficient information regarding whether the distinctive round-arched entrance to the corridor and the larger shallow-arched entrance to the current lift area are to be retained. This part of the design should be treated with care as the opening up of the space beyond these arches into the hotel reception should not distract from the key elements of the main entrance lobby, one of the architecturally richest parts of the retained building.

## **7.0 Impact of the new building upon the retained listed building**

7.1 Ealing Town Centre Conservation Area Appraisal (2007) states: 'The Town Hall is doubtlessly the most significant building in the western section of the CA and strongly defines its character and identity.' It identifies primarily its palette of materials and position as a landmark created by the clock tower as key elements of this significance. The statutory list description (NGR ref. TQ1753880716) makes reference to the original 1888 hall and the 1930 additions and observes that 'both sections of the building have good stairhalls with contemporary decoration.'

7.2 The history of extensions to Ealing Town Hall is one of sympathetic additions, typified by the southern elevation, which appears almost as a single phase, rather than the three phases between 1888 and 1930. The present building is the result of gradual accretions, each phase bearing individual characteristics but without changing the overall character of the building, although some elements in the central section of the rear elevation detract from the building's significance (Heritage Audit, Alan Baxter Ltd, 2008).

7.3 The London Plan's paragraph 7.31 states that 'Development affecting heritage assets and their settings should conserve their significance, by being sympathetic to their form, scale, materials and architectural detail'. By virtue of its height and massing, the proposed extension will be readily identifiable as a new addition to the listed building. Although it will be a substantial addition in its own right, it will not be so dominant as to obscure the significance of the listed building, owing partly to its location at the rear of the site.

7.4 As paragraph 3.18 of the ADZ Design and Access Statement notes, the new construction will have an important relationship to the Dickens Yard development to the north of the Town Hall, contributing to the creation of a new public space to the rear of the Town Hall, an area which has previously been underutilised. This is a positive element of the design which would be welcomed.

7.5 One element that would benefit from further consideration is the apparent lack of relief in the proposed extension's north elevation, facing Dicken's Yard. The retained listed building is characterised by elevations which vary in depth and the configuration of openings, in contrast to the proposed extension. Increasing the depth of window reveals would help the north elevation to better relate to the character of the listed building.

7.6 Drawings VIEW 06 and P 17 of the refined proposals (ADZ, October 2018) depict the north elevation of the new extension. The junction of the second and third storey floor slabs with the large glazed areas is depicted differently. Further clarity regarding this element is needed as it is currently unclear how this feature will be resolved.

7.7 The reduction of the rooftop plantroom's proposed size (Refined Proposals, ADZ, October 2018) is welcomed, although the present plans and visualisations are generally lacking in detail. For the submission, the application should set out how its size and shape have been influenced by known plant requirements of the building and should refine the plantroom's design accordingly, in order to avoid later redesign of this element.

7.8 An element requiring clarification is the junction between the new porcelain-clad extension and the retained Victoria Hall and associated new brick extension to the Hall's north elevation. Drawing VIEW 06 of the refined proposals (ADZ, October 2018) shows the latter extension's pitched roof cutting across two first-floor windows on the larger new extension which would appear awkward both externally and internally. Further information is also needed regarding whether a flashing will be employed between the new extension and the retained brick building, or if an alternative approach will be adopted.

7.9 Concerning the palette of materials, we believe that the predominating beige and grey porcelain tiles are an appropriately sympathetic choice, considering Ealing Local Policy 7C (Heritage), and to some degree helps to resolve the difference in character between the old and new buildings.

7.10 The replacement of the existing staircase and outbuildings on the north elevation of Victoria Hall with a sympathetic new construction in brick, plate glass and terracotta is a successful aspect of the design which would potentially enhance an area of the site previously deemed to detract from the listed building's significance.

7.11 A further positive element of the proposal is the retained public access to the building and the increased permeability of the Town Hall. Paragraph 7.32 of the current London Plan states that 'Every opportunity to bring the story of London to people and ensure the accessibility and good maintenance of London's heritage should be exploited'. The proposal goes some way in addressing this point by keeping historically significant civic spaces open to the public, with the Victoria Hall remaining a publically accessible space and the Nelson and Telfer Rooms being converted into restaurants.

7.12 Moreover, the retention of democratic services in the East Wing of the Town Hall will keep a series of historically significant spaces open to the public. It will be important in the formal application to clearly outline the extent of public access to bookable areas such as the Victoria Room.

## **8.0 Impact of the new building upon key views within the Ealing Town Centre Conservation Area**

8.1 The importance of the Town Hall to the Ealing Town Centre Conservation Area has previously stated in paragraph 23. Policy 7.12 of LB Ealing's Development Management DPD, 'Ealing Local Variation – Implementing the London View Management Framework', identifies Ealing Town Hall as one of fifteen borough-wide 'Landmarks' and states that 'Proposals for the development of designated Landmarks should not compromise or detract from those elements that make them important as landmarks' (LB Ealing, December 2013).

8.2 The visualisations of the proposed development indicate that the new extension is generally concealed from view behind the retained listed building. Where it is visible, its impact is significantly lessened by its setting seen against the taller Dickens Yard development to the north of the Town Hall.

8.3 VIEW 04B illustrates a key view of the building within the Conservation Area, as identified by the Heritage Impact Assessment (Cotswold Archaeology, 2018) and the Conservation Area Appraisal (LB Ealing, 2007) shows that the new extension will be visible from opposite the Town Hall on New Broadway. Its flat roof and largely glazed facades contrast with the existing roofscape, characterised by steep tiled gables, elaborate brick chimney stacks and iron finials. This change in roofscape has been agreed in principle but detailed design is necessary to minimize harm and evidence should be provided that this building height is necessary for the successful conversion of the building to hotel use.

8.4 VIEW 07A illustrates another view of the clock tower, from the northeast, which will be lost as a result of the new extension. It is a rare remaining view of the clock tower from the north, after the blocking of nearly all northerly views of the clock tower after the construction of Dickens Yard and the site's previously low accessibility as the Council offices' car park. However, northern views of the Town Hall and its clock tower have always been less significant, secondary views compared to views from the south, in particular from New Broadway. Furthermore, northerly views of the clock tower are not defined as key views in the Conservation Area Appraisal (LB Ealing, 2007). Therefore, although the loss of this view would harm the significance of the building, this harm appears to be less than substantial given the historic context of northern views as subordinate to the key views from New Broadway.

## **9.0 Impact of the new building upon the setting of nearby heritage assets**

9.1 Numbers 14-36 New Broadway are a locally listed parade of Edwardian shops directly to the east of the Town Hall, and are of a complementary architectural style to the Town Hall. The key view of this parade is from the opposite side of New Broadway, from where one also views the complete, highly significant southern elevation of the Town Hall. The elevations of the two heritage assets are of complementary architectural styles and massing and materiality. As View 04A demonstrates, the new building will be visible from opposite Nos. 14-36 New Broadway, but does not seem to detract from the locally listed parade's setting.

9.2 The former Empire Cinema, opposite the Town Hall, is currently being redeveloped into the Filmworks residential and commercial development. The building is locally listed, although only the façade has been retained during the redevelopment and it is not yet known whether this local listing will be maintained. Although it is clear that the new extension will be visible from the Filmworks development's north elevation, illustrated to some degree by drawing P 15 (Revised Proposals, ADZ, October 2018), the new extension will be seen against the backdrop of the larger Dickens Yard development and therefore does not seem to detract from the setting of the former cinema.

9.3 The Parish Church of Christ the Saviour (Grade II\*) lies to the east of the Site along New Broadway. STRATEGIC VIEW 01 illustrates clearly that the scale of the Dickens Yard development has created a permanent visual break between the two listed buildings and as such, the addition of the new extension, which is smaller in scale than the surrounding new buildings, will not detract from the setting of the Grade II\* listed church.

9.4 Ealing's locally listed Victorian fire station lies to the north of the Site. It was constructed in 1888, at the same time as the Town Hall, but its historic visual connection with the Site was severed with the construction of the Dickens Yard development and as such, any changes to the Town Hall will no longer impact upon the Fire Station's setting.

9.5 Numbers 15-31 New Broadway are a locally listed parade of Edwardian shops that lie to the southeast of the Town Hall. PROPOSED VIEW 03 indicates that the new extension will not be visible



from this parade of shops and there will be no impact upon their setting, aside from the wider impact of the addition of a new building to the Town Centre CA.

## **10. Summary of level of impact of the proposal upon relevant heritage assets**

10.1 The following table summarises the likely level of harm of the proposal upon relevant heritage features, based on the information provided at pre-application stage:

<b>Heritage feature</b>	<b>Likely level of harm</b>
Historic fabric of the Ealing Town Hall (Grade II)	Less than substantial harm
Ealing Town Centre Conservation Area	Less than substantial harm
Key views of the Town Hall	Less than substantial harm
The setting of nearby heritage assets	No harm

## **11.0 Feedback on pre-application documents**

11.1 The client's engagement from an early stage with Historic England has been of benefit to the project, but it is important to note that not all points raised by HE have been addressed in the pre-application material provided. Firstly, there are currently no drawings that detail how servicing and riser locations will impact upon the building's historic fabric. Further, while a heritage gazetteer has now been produced in accordance with Historic England's wishes (Alan Baxter, March 2018), the Heritage Impact Assessment and Design and Access Statement do not currently make reference to the Gazetteer. This is a core document in the application process that provides much needed information regarding the location of affected heritage features within the building and would help to inform their removal, relocation or retention. It should be extensively utilised during the refinement of proposals relating to the building's historic features and fabric and the creation of a comprehensive method statement regarding heritage features.

11.2 The Heritage Impact Assessment produced by Cotswold Archaeology (March 2018) provides some useful information but would benefit from greater clarity as to the significance of individual rooms and areas. In particular, Figures 7 and 8 (ground and first-floor plans mapping significance) only provide information on the significance of certain areas, with the majority of the floor plans left white possibly to indicate a neutral contribution. Given the extent of works, it would be useful to clarify these areas' contribution to the building's significance.

11.3 Additional significance maps should be produced for the basement, lower ground and second floors as works in these areas will affect significant spaces identified in the Heritage Gazetteer (Alan Baxter Ltd, March 2018).

11.4 It would be helpful for Figure CA7 of the Heritage Impact Assessment to identify locally listed buildings in order to clarify which nearby heritage assets will potentially be impacted by the development.

11.5 It is recommended that prior to formal submission of the planning and LBC applications, the visualisations are rendered to a higher quality than at present. In addition, the quality of the historic photographs and building plans should be improved as at present they are pixelated.

11.6 The suite of documents will generally require updating and refinement prior to the submission of the LBC and full planning applications, as many of the images and descriptions are now out of date,

given recent amendments to the design. In particular, the following aforementioned areas should be addressed:

- a. Detail designs and method statement for the installation of a new EA access entrance in the retained building's eastern elevation (see paragraph 6.2)
- b. Method statement for the relocation of the Victoria Hall's eastern rose window (see paragraph 6.3)
- c. Method statement for the reinstatement of a terracotta panel in the Victoria Hall's north elevation and exterior detailing of new brick extension (see paragraphs 6.4 and 6.5)
- d. Detailed designs of the proposed Queen's Hall partition (see paragraph 6.6)
- e. Comprehensive method statement regarding changes to heritage features identified in the Heritage Gazetteer (Alan Baxter, 2018) (see paragraph 11.1)
- f. Details and sections of the floor slabs, glazing and cladding in the new extension's north elevation (see paragraph 7.6)
- g. Refinement of the design of the rooftop plant room (see paragraph 7.7)
- h. Details of the junction between the new extension and Victoria Hall (see paragraph 7.8)
- i. Drawings illustrating the position of servicing and risers, as requested by Historic England (see paragraph 11.1)

## **12.0 Conclusion**

12.1 The current proposals are acceptable in principle and we believe that they have the potential to cause less than substantial harm to the heritage significance of the Town Hall while securing its future, but there are aspects of the design that still need to be confirmed or refined.

12.2 Although the demolition work will be extensive, it is mainly limited to areas identified to be of lesser or no significance. Where areas of demolition will be harmful to the significance of the historic building (the eastern bay of Victoria Hall), the application must justify this as part of the necessary work to convert the building to a viable new use. Moreover, it is important that steps are taken to mitigate this harm as much as possible. Method statements and additional drawings are advised in a number of specific cases identified above.

12.3 An important issue in conservation terms is the scale, massing and architectural character of the new extension in relation to the listed building. Taking into account discussions with Historic England, the scale and massing appear acceptable in terms of their relationship to this less significant rear elevation. In terms of design and materiality, the use of porcelain tile cladding is welcomed as a 'natural' material that relates to the brickwork.

12.4 However, based on the drawings and visualisations provided, the modelling of the façades is lacking in depth and relief. Therefore, further consideration should be given to details such as the depth of window reveals. There is an opportunity to provide greater surface relief, which may help the extension relate more successfully to the character of the historic façades.

12.5 The impact on nearby heritage assets currently appear to be minimal, largely due to the fact that the Dickens Yard development has cut off several historic relationships between nearby heritage assets and the Town Hall, but also because the new extension's location at the rear of the building largely screens it from view from the locally listed buildings on New Broadway.

12.6 The suite of documents requires refinement in order to be representative of the current proposals, and more information is necessary regarding the areas addressed in this pre-app response.

**Prepared by** John Willans  
**Reviewed by** Robert Hradsky  
**Issued** 26 October 2018

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Your ref: **ZM/AM/A.16.130.2A**      Our ref: **182461PAC**

Date:  
**26th October 2018**

Dear Zsolt,

**Town and Country Planning Act 1990 (as amended)**

**Development: Partial demolition, conversion, alterations and extensions of Ealing Town Hall to provide a new hotel and retain community, publicly-available facilities and Democratic Services, with associated development.**

**Ealing Town Hall, Uxbridge Road, Ealing**

Please find below the Council's pre-application advice in respect of the above development. Please note that this advice represents officer opinion and is given without prejudice to the formal outcome of any future planning application.

**Executive Summary**

London Borough of Ealing (LBE) Cabinet resolved to seek alternative uses and developer procurement for Ealing Town Hall (ETH) and to select your Client Mastcraft, an established hotel operator, as the preferred bidder, who will provide this development. The conversion of ETH, a Grade II listed Landmark building in the Ealing Town Centre Conservation Area, to provide a hotel with shared community facilities and Democratic Services for LBE is therefore agreed in principle but is still subject to assessment by the planning process in the normal way. The Town Hall is also an Asset of Community Value (ACV)

In conjunction with the new use, works of demolition, alteration and extension are proposed, that have been the subject of extensive discussion including with Historic England (HE), who have no objection in principle. Further, you have conducted a community consultation during the currency of this pre-application process. The outcomes of that process have been incorporated into scheme refinements and are referred to in your Statement of Community Involvement (SCI).

The design ethos and scale of development overall, including its' height, is considered to be generally sympathetic and appropriate to the location. The harm to heritage assets is deemed to be less than substantial. In applying the Planning Balance in accordance with statute, policy and case law, the public benefits of the development are considered to outweigh the harm.

The development of the Landmark Town Hall building in this key Civic Quarter location, so close to the Filmworks and music/theatre heritage of Ealing centre, provides a unique and exciting opportunity for your Client to fully integrate into this vibrant community. It is hoped

that Mastcraft will want to make best use of the synergy it will inevitably draw and become an active participant and supporter in local activities and the facilities it will be able to offer in order to promote this cultural heritage.

Subject to you satisfactorily addressing the remaining consultee comments it is appropriate for you to finalise preparation of the application for planning permission and listed building consent.

#### **Submitted Plans / Documents**

1. Air Quality
2. Planning Statement
3. Heritage
4. Building Condition Survey and Repair and Restoration Strategy
5. Acoustics
6. Car Parking
7. Travel Plan
8. Ecology
9. Drainage
10. Refuse Management Statement
11. Sunlight/Daylight/Shadow
12. Archaeology
13. Construction Management
14. Design & Access
15. D & A Appendices
16. Statement of Community Involvement
17. Amended Drawings following Community Consultation and Refinement of Proposals

#### **Site Description**

The site is located adjacent to the western boundary of the Ealing Town Centre Conservation Area. It is bounded to the south by Uxbridge Road/New Broadway and to the west by Longfield Avenue. It adjoins or is close to a number of locally listed buildings including 18-36 New Broadway. To the east is the Grade II\* listed Parish Church of Christ the Saviour. To the north and north east Apsley House, Belgravia House and Fitzroy Apartments, forming part of the Dickens Yard re-development.

The character of the area typifies the Metropolitan Centre designation with a range of retail, commercial, leisure and other uses. The Empire Cinema on the opposite side has begun its reconstruction. The locality has a Public Transport Accessibility Level (PTAL) rating of 6A, and is within a controlled parking zone (CPZ). There is no existing on-site parking. Servicing is normally from Longfield Road.

The site contains the Ealing Town Hall (ETH) within the freehold ownership of LBE. It provides a collection of community, civic and leisure uses within the town centre. It is currently under-occupied and considered to no longer meet the modern needs of users. It requires extensive repair and on-going maintenance.

Perceval House is intended to be developed as a new Civic Offices for LBE, library and community uses. Along with Dickens Yard it is expected to see a significant expansion of residential land use, whilst adding to civic, cultural and commercial vibrancy of Ealing centre.

In brief, ETH is a Grade II listed building (19<sup>th</sup> January 1981) with a fine, imposing façade principally in the neo-Gothic style facing Uxbridge Road to the south. It was built between 1886 and 1888 for the purposes of a town hall, library and memorial hall and includes the Victoria Hall built in 1887 for use by local groups and societies.

Later infil dating from 1945-1956 is visible on the north elevation. The morphology of the building is reflected in the visual qualities and heritage value of its principal elevations to Uxbridge Road, with elements of lesser heritage and historic value visible on the north elevation viewed from Dickens Yard.

The List Entry states:

*'Ealing Town Hall. 1888 by C Jones in neo-Gothic style. Asymmetrical, faced in ragstone under a slate roof. Generally 2 storeys with 3 storey gabled entrance and a 3 storey hipped centre bay. Off-centre tower with lancet windows setting back and terminating in a spirelet. Heavy octagonally towered entrance right added in 1930. Both sections of the building have good stairhalls with contemporary decoration.'*

## Proposal

The proposed development is described in detail in the consultation documentation. It comprises in summary:

1. demolition, alteration and replacement - mainly within the core of the building - to form a 120 guestroom hotel with associated facilities, health and fitness club, bars and bistro, conference and meeting rooms,
2. 5-7 storey above ground extensions (and associated works in the existing lower ground level) for hotel use,
3. retention of the eastern wing for Democratic Retained Property (DRP) purposes by LBE, Committee rooms, weddings and community groups,
4. community accessible space and meeting rooms (totalling 8 areas) including in the Victoria Hall,
5. associated external works including a new DDA compliant platform access on the eastern elevation and re-opening the existing, secondary, pedestrian entrance fronting Uxbridge Road,
6. enhanced 'animation' of the Uxbridge Road and Dickens Yard frontages to include external seating and additional cycle racks,
7. remodelling of the external staircase, substation and bin store on the north side of the Victoria Hall.

The scheme has developed during a process of consultation with Officers and HE, resulting in a reduction in heights by 1.5 and 2.5 storeys and consequent reduction in the number of guestrooms from 140 to 120. by Your Client has carried out a community consultation, the form of which is considered to comply with the Council's Statement of Community Involvement, July 2015, which is not prescriptive. The SCI outlines your engagement with public bodies, community groups and individuals.

Following conclusion of the consultation, in your Refinement of Proposals documents received on 15<sup>th</sup> and 22<sup>nd</sup> October 2018 you list, with plans, the following changes to the scheme in response to comments received, which I quote from your SCI:

*'The principal design development stages resulted in a number of refinements to the design, including:*

- *Reduction in height to ground, mezzanine and five upper storeys in relation to Dickens Yard*

context as well as the wider context of strategic views in the Conservation Area.

- *Reduction in width to provide a gap between the new block and the eastern buildings of the Civic wing and introduction of fenestration into the eastern and western flank walls.*
  - *A rationale for the composition and constituent materials for the new façades with an emphasis on lightweight treatment to contrast with the traditional brickwork of what was originally the less important rear elevations of the Town Hall*
  - *Reduction in the width of the roof plant enclosure from 10x10m to 8x10m to benefit the residents in the upper floors of the Dickens Yard residential development. The height of the roof enclosure screening is 1.5m, less than half of a normal full storey height of 3.2m.'*
- These changes have been taken into account in preparing this letter.

### **Relevant Planning History**

P/2012/2157-ET Replacement of external fire escape staircase and door to the rear of Town Hall (following removal of existing external staircases); repair and restoration of the rear elevation windows, doors and brickwork; and bin store enclosure to rear of building (Deemed Consent) granted 17/10/12. The permission was implemented and is intended to be modified as part of your scheme.

The above permission was granted in association with the Dickens Yard mixed use residential-led and commercial/retail development granted permission (ref 2008/D156) in 2009 (and nearing completion), up to 8 storeys adjacent to ETH and elsewhere rising to 15 storeys in height, that has brought about a new setting to the Town Hall and the adjacent Conservation Area.

On 12th July 2016 LBE resolved to approve the selection of your Client Mastcraft as the preferred bidder for the development and refurbishment of ETH and disposal by way of a long lease for up to 250 years in accordance with the following objectives:

*'3.1 Ealing Council is seeking to redevelop Ealing Town Hall. This will help transform the town centre and save millions of pounds over the coming years. The redevelopment will ensure the Town Hall continues to be accessible to the public, offers affordably priced and improved space to hire and retains its civic functions including council meetings and marriage rooms. It will allow a more efficient use of space for civic use in an improved building which is old and in need of costly repair and improvement. This will help protect this important Council building's heritage and future.'*

*'3.2 The Council has four strategic objectives for the project, namely–*

- 1. To ensure the successful and beneficial use of all parts of Ealing Town Hall, compatible with its iconic status within the borough.*
- 2. To secure commercially successful uses for those parts of the Town Hall no longer required for continuing council use, on attractive financial terms that are sustainable in the long term.*
- 3. To secure, at no cost to the council, the future repair, maintenance and upkeep of the exterior of the Town Hall and those part of the interior which are no longer required by the council.*
- 4. To secure suitable long-term accommodation for the ongoing democratic requirements of the council within the Town Hall, on attractive terms for the council.'*

These objectives form the basis of the Council's approach to the delivery of a successful scheme and are relevant to assessment of the merits of your Client's proposals although not all are expressly material planning considerations.



In considering the merits of your Client's proposals The Cabinet Report further noted:

*'Mastcraft:*

- ☐ *It designated a greater range of commercial uses at ground and basement levels. These uses include a hospitality area, three meeting rooms, a health & fitness centre to include a pool, a restaurant with private dining area, cocktail bar and bistro which activates the frontage to Dickens Yard.*
- ☐ *The commercial uses proposed will draw additional people to the area and will aid the town centre regeneration.*
- ☐ *The hotel would be similar in design and style to the Courthouse Hotel in Old Street, Shoreditch. This is a luxury, boutique hotel and the proposed development would bring regenerative benefits to Ealing.*
- ☐ *The uses are generally available to the public, restaurant, bar and space for hire.*
- ☐ *Mastcraft identify eight rooms in addition to the Victoria Hall that would be available for hire for public and community use. These eight rooms extend to 10,248 sq.ft (including the Victoria Hall).*
- ☐ *Mastcraft's link to the DRP is considered a good design feature.'*

ETH was designated an ACV on 10<sup>th</sup> August 2016, which is subject to separate consideration by LBE as is the evaluation of the status of the Victoria Hall.

### **Local Plan designation**

The site lies within the Metropolitan Centre, Central Ealing Neighbourhood Plan area, Town Centre Conservation Area, is a designated Landmark and adjoins an Archaeological Interest Area on the Ealing Council Adopted Policies Map (December 2013).

### **Relevant National, Regional and Local Planning Policies**

The assessment of the proposal has had regard to the following planning policy documents and guidance:

- National Planning Policy Framework (2018)
- The London Plan with Modifications (2016)
- Draft London Plan with minor suggested changes (2018)
- Ealing Development (Core) Strategy (2012)
- Ealing Development Management Development Plan Document (2013)
- Ealing Town Centre Conservation Character Appraisal and Management Plan (2007)
- Ealing Supplementary Planning Guidance/Documents.

Details of the relevant policies and guidance to the pre-application submission are set out in **Appendix 1** to this letter. You are requested to ensure that all relevant application submission documents are reviewed to make sure they include references to up to date policy and guidance.

### **Planning Considerations**

#### **Principle of Development**

The NPPF, 2018 para.85 states that planning decisions should support the role that town centres play at the heart of local communities, by taking a positive approach to their growth, management and adaptation. Hotels are included in the definition of Main Town Centre use.

London Plan Policy 4.5 support London's visitor economy and stimulate its growth, taking into account the needs of business as well as leisure visitors and seeking to improve the range and quality of provision especially in outer London and ensure that new visitor accommodation is in appropriate locations. Beyond the Central Activities Zone (CAZ) it should be focussed in town centres and opportunity and intensification areas, where there is good public transport access to central London and international and national transport termini. Plainly Ealing centre is well-located for this use in strategic terms. All of this is consistent with the London's Tourism Strategy.

The Draft London Plan does not indicate any change in this policy objective. Policy SD6 Town centres and high streets sub-para. G supports tourist infrastructure, attractions and hotels in town centre locations, especially in outer London, and states that they should be enhanced and promoted. Sub-para. H supports the delivery of a barrier-free and inclusive town centre environment that meets the needs of all Londoners, including disabled and older Londoners and families with young children. The inclusion of a new disability access in the scheme will help promote this.

Core Strategy Policy 2.5 seeks to Revitalise Ealing Metropolitan Town Centre with two criteria relevant to ETH:

*'...(e) To protect and enhance the quality of the existing townscape and historic character including:*

*to enhance historic buildings and frontages that contributes to the character and appearance of the town centre including removing/mitigating aspects of the built form that have a negative impact;*

*to introduce new town squares and public spaces; ...*

*to use the form and height of new development to create a coherent townscape across the different quarters of the town centre, but recognise that taller elements that respond to surrounding scales and features are possible in defined key locations;*

*to introduce high quality buildings that are well designed, environmentally sustainable and which meet the needs of modern occupiers, in particular, to provide landmark buildings in gateway locations...'*

(g): *'To provide a comprehensive range of cultural, heritage, social, sport and leisure facilities, including:*

*'...to refurbish Ealing Town Hall... to provide a new landmark focus for civic, community and cultural activities;*

*• to provide for a boutique hotel;...' (my emphasis)*

A boutique hotel is defined in the Core Strategy Glossary as: *'A term with a generally acknowledged meaning in the hotel industry. It refers to a smaller, more upmarket hotel often with a more distinctive character than hotels run by the larger and more middle market chains.'* The definition is therefore applicable to the Mastcraft proposal.

Taking account of the strategic aims in Core Strategy Policy 1.1 and 2.5, DMD DPD Policy 4.5 directs Hotel development in Ealing toward, inter alia, Ealing Town Centre and to locations with good public transport accessibility to be read in conjunction with Policy 4C and with Central Ealing Neighbourhood Plan Policy CC2 Community and Cultural Facilities aimed at supporting provision of new facilities for community and related uses.

## Heritage Assets

In assessing the effects of the proposals upon heritage assets, independent advice has been obtained from Alan Baxter Ltd. Conservation Consultants, who also carried out for LBE a

Heritage Audit in 2007 and the Statement of Significance in 2018 (the Gazetteer) that has been used formulating and assessing the proposals.

Alan Baxter's Report is attached in **Appendix 2**. They raise no objections in principle to the scheme but make a number of comments. You are requested to have regard to their comments in formulating the application in due course.

In addition, your Client has carried out pre-application consultation with HE culminating in their Advice Letter of 28<sup>th</sup> February 2018, which concludes: *'We welcome the revisions to the proposals, which have been made as a result of pre-application discussions with ourselves and the LB Ealing. Whilst we still consider the proposals to cause some harm to the significance of the listed building and the surrounding conservation area, by virtue of the loss or alteration of historic fabric and the impact of what is still a large extension on the surrounding conservation area, we do not consider this harm to be sufficient to raise an objection to these proposals, if they were formally submitted for planning permission and listed building consent. We also recognise that the proposed uses for the building will allow many of the highly significant interior spaces to remain largely unaltered and in active use.'*

*We would encourage you to further refine your proposals before submitting them for planning permission and listed building consent, including compiling an audit of heritage features, further details of associated alterations to historic fabric, including servicing and riser locations and further details on the design and materials for the proposed extension.'*

Having regard to the heritage advice we have received from Alan Baxter Ltd. no need is seen to disagree with HE's conclusion. HE does not describe the harm as 'substantial'. No reason is seen to disagree with this conclusion for, having regard to the advice in the NPPG the works:

- a. do not involve the total demolition of the building,
- b. demolition is focussed primarily on removing later additions of low heritage value,
- c. individually and cumulatively, the works of alteration or demolition are moderate or minor in scale.

Accordingly, the 'less than substantial harm' test in NPPF para.196 is engaged in terms of whether there are clear public benefits of the proposals that would outweigh the less than substantial harm to the significance of a designated heritage asset. In assessing this harm I direct you to the Alan Baxter Report and the areas of greater detail and absent information that will need to be addressed in the application submission in due course.

I need also to forewarn you that absence of these requested details could affect the validation of the application and delay the consultation process while we await them so I strongly encourage you to pick them all up in the meantime.

NPPF guidance does not explain the concept of public benefits. The NPPG states: *'Public benefits may follow from many developments and could be anything that delivers economic, social or environmental progress as described in the National Planning Policy Framework.... Public benefits should flow from the proposed development. They should be of a nature or scale to be of benefit to the public at large and should not just be a private benefit. However, benefits do not always have to be visible or accessible to the public in order to be genuine public benefits. Public benefits may include heritage benefits, such as:*

- *sustaining or enhancing the significance of a heritage asset and the contribution of its setting*
- *reducing or removing risks to a heritage asset*
- *securing the optimum viable use of a heritage asset in support of its long term conservation.*

The public benefits you identify comprise, in summary:

- Fully developed and revitalised Town Hall will cater for a wide range of activities making it a real community hub, surrounded by Dickens Yard, Filmworks and Perceval House,
- Revitalised Town Hall will continue to accommodate all the Civic functions in a newly refurbished eastern wing, new DDA access and community-related functions in the remaining public areas of the high-quality hotel,
- The ground floor is re-planned to make it more permeable as a community hub, with access front-to-rear to a bistro fronting Dickens Yard,
- Victoria Hall will become a health and fitness club available to the community as well as hotel guests as well as for business or social functions, the Nelson Room available as a restaurant for hotel or visiting customers, the Telfer Room as a function room on the ground floor in conjunction with the main kitchen,
- Provision of a bistro,
- Cocktail bar in the hotel for guest and visitor use,
- Conservatory and roof terrace bar for hire,
- Hotel extension to replace haphazard low-level buildings,
- Public areas to incorporate state of the art technology,
- High quality hotel that will assure the long-term future of the Town Hall.

Your Drawing entitled 'Development for the Community' will be an important document to explain how the building will be used and incorporate space available for community activities as outlined in the SCI.

It requires amendment however to omit the salmon coloured shading in the void over the first floor of Victoria Hall (like other voids shown) as it incorrectly suggests this air space is available for community use. I question also whether halls and foyers should be coloured green - Areas Available for the Community - as they are available for all the uses that would be carried on in the building. Instead they should be uncoloured, as you have done for the rear fire escape and the courtyards on the lower ground floor. Lastly, and for completeness, the DRP refuse store should be coloured Blue – Council Areas.

Taking account of the NPPG guidance and development plan policy, the public benefits you identify are relevant considerations consistent with the Council's started objectives to secure an appropriate re-use of the Town Hall building that retains and enhances its long-term future as a key historic and cultural landmark of Ealing Centre. In addition, the wider accessibility to the building, for example by the re-opening of the secondary entrance to Uxbridge Road to the public by creating a north-south axis to Dickens Yard, will provide an opportunity appreciate more of the Town Hall interior.

However, even if less than substantial harm to the significance of a designated heritage is found, the decision maker still needs to give considerable weight to the desirability of preserving the setting of the asset.

In this case the Alan Baxter Ltd. Assessment has in summary and based on the submitted information, found less than substantial, or no, harm to the character and appearance of the Central Ealing Conservation Area, alongside the other identified heritage assets and their settings. This harm would not be sufficient to outweigh the public benefits of the proposals.

The proposals therefore comply with London Plan Policies 7.8 and 7.9 and DMD Policy 7.12 (8) in relation to the Town Hall as a designated Landmark and with Central Ealing Neighbourhood Plan (CENP) Policies HBE1 and Policy HBE2.

### **Urban Design and Development Management**

The proposed development should be designed (in accordance with London Plan Policies 7.1 – 7.6) to help ensure that a place is created that responds positively to the character of the surrounding area. The proposals overall are considered to contribute to a sense of place and in their design respect their context and help to reinforce and enhance the main Town Centre and civic character in accordance with Core Strategy Policy 2.5.

The provision of a secondary DDA access on the east side of the building to Dickens Walk, giving access to the retained Democratic Services area, is a welcomed addition. Providing active frontages to Dickens Yard and Uxbridge Road will help to integrate the hotel use better in the town centre but careful attention will be needed in relation to external furniture, lighting and signage.

Consideration has been given to whether this constitutes a 'tall building' in the context of development plan policy. DMD Policy 7.7 and CENP Policy HBE3 state that tall buildings are defined as those that are substantially taller than their immediate surroundings and/or neighbours and/or which significantly change the skyline. This is an objective judgement based upon local circumstances. Within this analysis is the assessment of impacts on ETH as a designated Landmark, in accordance with DMD Policy 7.12.

The proposal has two elements stepping back from Uxbridge Road. Facing Dickens Yard it reaches a maximum of 7 storeys above ground (excluding the roof plant) which, although taller than the Town Hall and the extensions it replaces, is lower than its 8-10 storey neighbours - Apsley House, Belgravia House and Fitzroy Apartments - on Dickens Yard that provide the backdrop to publicly accessible views of the Town Hall from the south, west and east. The second element reaches 5 storeys above ground and sits behind the main Town Hall roof ridge, with the upper most part - a light well - just 'crowning' the ridge in some views from Uxbridge Road.

The Townscape Analysis strategic viewpoints (agreed with HE) show that the backdrop provided by the new Dickens Yard buildings remain the dominant feature, whilst no part of the new hotel alters the current appearance, or views, of the front Town Hall façade or the clock tower. In this respect the proposal does not interrupt or impact on the Town Hall's Landmark status from the Uxbridge Road frontage or longer range views.

From the rear on Dickens Yard, the 'infil' replacement building is plainly taller than the 2-3 storeys existing to be replaced and the retained elements either side. These views are not the same Landmark views as from Uxbridge Road. Glimpses of the clock tower are no more than that. It is not apparent that this is or was intended to be an intended or designed view of the Town Hall. As such compromising or losing the view will not be significant or harmful in heritage or townscape terms.



It will be nevertheless be 1-2 storeys higher and therefore taller than the flanking Victoria Hall and 1930s Town Hall wing and certainly more prominent especially to short range views on Dickens Yard. Whilst visible from Uxbridge Road and viewpoints from the south, these views tend to be partial or interrupted (the new Filmworks building will obscure views from Barnes Pike), with tree cover on Ealing Green giving filtered or no views according the season. Ultimately, longer-range views are read in the context of the significantly taller Dickens Yard blocks behind and the clock tower.

The principle of a hotel here complies with spatial policy objectives of the development plan. An extension to provide the bulk of the hotel guest rooms is the optimal approach to incorporate this fundamental component with the protection of this heritage asset. DMD para. E7.7.1 requires therefore the primary consideration for any scheme is that it makes a positive contribution to the urban environment.

From Dickens Yard, the mass, bulk and height is clearly more substantial than existing and reduces the sky view albeit mainly at ground floor. You have supplied a Daylight, Sunlight and Overshadowing Report dated September 2017. As it stands it finds that the overall impact on residents of adjacent flats would not give rise to significant adverse harm and above typically expected standards in an urban location. However it should be updated to conform to current plans where they have changed and have express regard to how the scheme reconciles the SCI community consultation comments.

The extension is not expected to compete with the Town Hall in townscape terms, whilst that which it replaces is not generally regarded as having an over-riding significance in heritage or architectural terms. The building extension overall introduces a design code unique to the site, which is expected given the special character and quality of the host Town Hall building in the Conservation Area and protecting the key components of its Landmark status.

The extension uses light-coloured beige and grey facing tiles elevations relieving large areas of glass. Alan Baxter support this approach and the opportunity to enclose the emergency staircase. The replacement of a large section of the recent fire escape stair, sub-station and store with a new refuse enclosure for the hotel and DRP is also supported in design terms.

There are concerns however about the lack of clarity and detail in certain design elements. Drawing P23A is a case in point. It is not possible to understand how the floor plate relates to or is visible in the larger windows. In addition the shadow lines (which should be avoided generally except in CGI images) obscure proper understanding of window form and depth of recesses.

Detailed sections will therefore be required through all elements of the new-build and junctions with the existing buildings. Additional comments/concerns are made in the Alan Baxter letter attached.

Subject to the further details therefore, the new building form overall demonstrates the capacity to secure a high quality, exemplary design that responds well to its location, enabling the scheme to achieve the level of quality and a sustainable development required by the NPPF and Development Plan.

### **Impacts on Neighbours and the SCI**

Those residential properties and the podium amenity space most affected lie to the north at Belgravia House and Aspley House. DMD Policy 7B seeks that new development must

achieve a high standard of amenity for users and for adjacent uses. Development plan policies and guidelines promote high standards of design that minimise loss of privacy mainly in relation to opposing dwellings.

In this case they are hotel room windows facing flats and the separation distance will be generally 11m to the flank of Belgravia House and the podium amenity space. I have no feedback to date from your community consultation how much of an issue this is for residents. However this separation is similar to other residential blocks on Dickens Yard and is therefore considered acceptable in principle.

The submitted plans and elevations do not include sufficient, if any in some cases, information about their relationship to neighbouring buildings around the site perimeter (e.g. P02 - P06), making it difficult to understand what if any impacts they may be likely to have. Unlike P01, Drawings P14 - P17 for example omit Fitzroy Apartments and 18-36 Uxbridge Road.

Overall however it is not considered the extension will give rise to an unacceptable loss, or the perception of loss, of privacy or amenity between existing residential accommodation and upper floor hotel guest rooms.

You have provided a Daylight, Sunlight and Shadow assessment of the proposed development impacts on flats in Dickens Yard. The overall conclusion is that taking account of this urban location the assessments confirmed substantial compliance with the BRE recommendations that which would typically be expected in this urban location. I have requested that the Report be updated to reflect the current plans and specifically address what response you received to:

- *The impact of daylight and sunlight on the Dickens Yard development;*
- *The issue of privacy/overlooking in relation to the Dickens Yard development;*
- *The design and massing of the new block.'*

and how you intend to, or have dealt with it.

The hotel use also presents a potential but manageable conflict with adjacent residential uses. Sound insulation will be particularly important but it is also necessary to give full consideration to the management of uses including ventilation/cooling, use of smoking spaces etc. so that they do not adversely compromise sound insulation or general residential amenity.

The overall design of this scheme would therefore be, on its merits and development plan policy compliant in terms of urban design (sense of place, density, new public realm, landscaped areas and active frontages to Dickens Yard) residential amenity (so far as is clear from the submitted information), external and internal amenity space standard and respect the setting of heritage assets and optimise development potential.

The SCI in its present form lacks sufficient detail and clarity to enable me to assess the content of the representations you received to the leafletting, exhibitions and meetings and how they are all addressed. For example, other than the generalised description we have no indications what precisely each of the 5 stated 'issues' or 'reservations' concern. Presumably they were enunciated in the space given for further comments. If there are only 5 areas then each should be given a more detailed analysis in turn. I have already indicated that the sunlight/daylight/shadow report needs updating as necessary.

Lastly you indicate in the SCI your Client's commitment to ongoing engagement and dialogue with local residents as the planning and construction progresses. This is welcomed and your SCI accompanying the application should set out how you intend to deliver this.

### **Highways**

The London Plan requires that new development ensures highway safety and is designed to maximise the use of public transport and other non-car methods of travel and also requires that development provides adequate servicing capability and does not subject surrounding streets to parking stress or compromise traffic safety. Advice from LBE Transport Section is as follows.

London Plan (6A.9) requirement to provide one coach parking space per 50 rooms for hotels. This may not be possible due to site constraints but arrangements for coach drop-off and pick that do not cause obstruction on the public highway should be considered.

It is proposed to limit the maximum size of vehicle that can serve the site a 10m rigid vehicle. However, to further mitigate potential amenity and safety impact of the development, stronger restriction could be imposed at busier times of the day. For example, restricting loading and unloading during the morning and evening peak period when pedestrian activity is likely to be at its peak. A loading assessment has been carried out by the applicant and it suggests that there will be 18 LGV and 6 OGV two-way movements per day.

This equates to a total of 12 deliveries a day which a single a loading space can accommodate if it is well managed. Imposing a max stay limit to improve turnover is recommended. To help differentiate the servicing area/pad at the rear of the town hall, a different surface treatment and signage is recommended. Support proposals for parking enforcement and management as well as retaining the existing collapsible bollards.

Pedestrian and cycle access to the hotel is critical. Long-stay cycle parking at one end of the building (western side) and it would be useful to have a facility at both sides of the building. The possibility of locating some cycle parking at the eastern side of the town hall should be explored. The proposed egress points are acceptable. However, the width of the ramp leading to the main town hall entrance appears very tight particularly for hotel guests who may be carrying luggage. The applicant is asked to confirm that a secondary access have a goods lift and if so then, this should be signed.

Internal storage is proposed for long-stay cycle parking and it is recommended that parking for staff and hotel guest are provided in separate compartments. Also, short-stay visitor spaces should be provided in a covered, secure and lockable environment. The type of stands used must allow both wheels and the frame of the bicycle to be locked.

The quantum of cycle parking proposed is acceptable as it exceeds draft current London Plan standards. In total, 20 long stay, 12 existing stands and 9 cycle racks will be provided on site but, it is not clear where long stay cycle parking for Town Hall staff is proposed. The applicant is asked to confirm cycle parking for existing town hall staff. Locations for new cycling stands will need to be agreed. Extending the currently available area fronting Uxbridge Road is one area.

Accident analysis for an area 0.5km radius of the site needs to be undertaken. Trip generation is not expected to be a major issue.



An updated travel plan, delivery and servicing plan and construction management plan is required as the drafts submitted require further changes. S106 contributions would be sought for pedestrian, cycle and public realm improvements near the site.

### Servicing

The applicant will be expected to assess the impact of servicing both on and off street, particularly in relation to the use. Refuse collection arrangements will need to be agreed with the Council's Waste Management Department. You have made provision within the scheme for a new waste store to include the retained Democratic Services which meets the Council's requirements.

### Environmental Impacts

London Plan policies 3.2, 5.3 and 7.14 along with Local Plan Policy 7A are relevant considerations and it is recommended that acoustic and air quality consultants for the proposed scheme contact the Pollution Technical Team before carrying out any measurements, samples or calculations. The team email is [pollution-technical@ealing.gov.uk](mailto:pollution-technical@ealing.gov.uk).

#### a. Noise impact

Insulation of the building envelope is required to create acceptable conditions particularly in respect of the propose use. Details would need to be provided by the applicant to demonstrate that existing neighbouring residential units would not be unduly impacted by noise from the new development.

Advice from Pollution Technical is that given the unsatisfactory noise assessment so far and Construction Management Plan by Clancy Consulting, ref. 2/7903 dated 8 Sept.2017, I recommend conditions and informatives for full consideration and better details to be submitted for consultation.

#### b. Air quality

Ealing Borough was declared an Air Quality Management Area in 2000 and advice contained in the Air Quality Neutral Planning Support Update (Ref. GLA 80371) should be followed.

To enable implementation of the London Plan and the Mayor's Air Quality Strategy, emission benchmarks have been produced for building operation and transport based on the latest technology. Developments that do not exceed these benchmarks will be considered to avoid any increase in NOx and PM emissions across London as a whole and therefore 'air quality neutral'. Appendix 5 of the Sustainable Design and Construction (2014) Supplementary Planning Guidance defines Building Emission Benchmarks (BEBs) for NOx and PM10 for a series of land-use classes (see below). Not all of the land uses are applicable to your proposal.

Air quality neutral' emissions benchmarks for buildings

Land Use Class	NOx (g/m2)	PM10 (g/m2)
Class A1	14.4	1.57
Class A3-A5	47.9	5.23
Class A2 and Class B1	19.6	2.15
Class B2 - B7	29.6	4.29
Class B8	19.1	2.76

Class C1	45.2	4.93
Class C2	150	11.5
Class C3	57.3	4.38
D1 (a)	27.4	2.99
D1 (b)	47.8	5.22
Class D1 (c -h)	19.7	2.15
Class D2 (a-d)	57.5	6.28
Class D2 (e)	181	19.8

### c. Drainage

Advice from the Lead Local Flood Authority (Highway Services) Ealing Council is that the approach adopted is acceptable in principle.

### **Sustainability**

All proposed strategic developments in Ealing should demonstrate their compliance with London Plan Policy 5.2(C) and DMD Local Variation - Energy and Sustainability. In accordance with Policy 5.2(C), developers are required to submit an Energy Assessment showing how the relevant policy objectives are to be realised, particularly with regard to application of the Mayor's Energy Hierarchy. This should demonstrate the energy and associated carbon dioxide emission savings that could be achieved through the incorporation of energy efficiency measures and low / zero carbon technologies.

The advice from the Energy Officer is as follows. I have now reviewed the report and the energy solution the consultants propose is generally accepted. The methodology followed to demonstrate the CO2 savings is also in line with Ealing's approach. That is noted.

The fabric performance of the existing and new building has been improved beyond the minimum requirements of the Building Regulations Part L 2013. This is welcomed. With regards to the energy servicing strategy, the report states that the development will be heated and cooled by Air Source Heat Pumps (ASHPs) and energy efficient gas boilers with the hot water served by Combined Heat and Power (CHP). This is generally a solution recommended for this type of developments. The proposed onsite energy centre will be future proofed to connect to an offsite heat network when one becomes available.

The energy strategy demonstrates compliance with the London Plan policy 5.2 by achieving an overall percentage reduction of 37% in regulated CO2 emissions beyond the compliant Part L 2013 base case.

With regards to the use of gas CHP, the applicant following discussion with myself contacted St George, the developer, for Ealing Filmworks and Dickens Yard to ask them about potential connection of this development to their site wide CHP heat networks but they have got no response yet. They should continue liaising with St George so to explore the potential link of this development to their energy centres.

From an air quality and carbon emissions perspective, the installation of gas CHP units in such a close proximity to each other is not generally accepted. PTT may also need to comment on this aspect.

In terms of the efficiencies considered for the ASHP, I would advise the applicant to take a more conservative efficiency e.g. 2.5 instead of 4. This is because in practice ASHPs do not

achieve so high efficiencies as most manufacturers claim that these systems achieve. Moreover, it would be useful if the applicant clarified in what form the ASHPs will be installed, namely in communal or individual form.

Additional technical information for the CHP and ASHP in line with the Mayor's energy statement guidance, March 2016, and Appendix B of Ealing's energy statement guidance should be provided together with the planning application.

In addition, the cooling demand of the new building should be reduced. Measures should be identified in line with the Cooling Hierarchy.

The auxiliary demand should be also reduced as it seems quite high.

It would be also helpful if the BRUKL reports are split in different appendices which indicate which part of the development and stage of the Energy Hierarchy present.

Since according to the report, solar PV is feasible, I would strongly advise the applicant to consider the installation of solar PV regardless if the CO2 emissions reduction target has been achieved. This is in line with GLA and London Plan. Plainly in view of its heritage status, the location of PV panels will require careful consideration and should be located on the extension.

### **s106 Obligations**

A key component of the delivery of the four strategic objectives will be undertakings to secure:

*'...3. To secure, at no cost to the council, the future repair, maintenance and upkeep of the exterior of the Town Hall and those part of the interior which are no longer required by the council.'*

*'4. To secure suitable long-term accommodation for the ongoing democratic requirements of the council within the Town Hall, on attractive terms for the council.'*

Below is a brief list of potential s106 heads of terms relevant to the subject application (subject to pooling restrictions with any Adopted Ealing Community Infrastructure Levy):

- Management of maintenance and repair works to the ETH building fabric incorporating the Building Condition Survey and Repair and Restoration Strategy,
- Plans and undertakings to show the areas to be made available to the public, restaurant, bar and space for hire and Mastcraft to identify eight rooms including the Victoria Hall that would be maintained as available for hire for public and community use and suitable arrangements (N.B. I note that you indicate the form of the offer at page 5 of the SCI),
- Travel Plan with monitoring costs,
- Pedestrian, cycle and public realm improvements,
- Energy monitoring.

### **Community Safety**

London Plan Policy 7.3 and the associated Ealing local variation require the design and layout of new development to be based on the promotion of a safe and secure environment. Policy 7.13 further requires that new developments demonstrate safety, security and resilience to emergency.

The design and access statement should also explain how measures to improve emergency resilience have been incorporated into the proposed development - these include fire escape signage and infrastructure for back-up power generation.

### **Community Involvement**

In accordance with the LBE Statement of Community Involvement, the Council strongly encourages ongoing engagement with the local community, which you have so far undertaken during this consultation process.

Below is a non-exhaustive list of external bodies we recommend you consult with prior to submission of a formal planning application:

- Crossrail
- TfL
- The Environment Agency
- Thames Water
- Ward Members
- Met Police Design Officer
- Fire Brigade
- Ealing Civic Society
- Ealing Community Network (contact ECN on [www.ealingnetwork.org.uk](http://www.ealingnetwork.org.uk))

### **Community Infrastructure Levy**

The Mayor's Community Infrastructure Levy (CIL) was adopted on 01/04/2012. This has introduced a charging system within Ealing of £35 per sqm of gross internal area to be paid to the GLA. The calculation of the CIL charge will take account of the provision of affordable housing.

Your attention is also drawn to the Council's own CIL charging schedule which is currently subject to examination with the intent to begin charging CIL on liable development from mid-2015.

### **Information to be submitted with the Planning Application**

Below is a list of the information likely to be required as part of a future planning application:

- Planning Statement
- Transport Statement
- Heritage Assessment
- Travel Plan
- S106 Agreement
- Urban Design Statement
- Noise and air pollution survey and details of the necessary mitigation measures
- Design and Access Statement
- Sustainable Design, Construction and Renewable Energy Statement
- Statement of Community Involvement
- Drainage Assessment Form and Sustainable Urban Drainage statement
- Fire Safety

You are asked to ensure that you provide:

- a. Method Statement of Works as outlined in the Alan Baxter Report and detailed plans to an appropriate small scale to cover the points a.- i. in para.11.6 of their Report,

- b. Higher quality image representations/colour renderings of drawings to help improve understanding of scheme images,
- c. up to date townscape views with new buildings as they currently appear – your Strategic Views 01 and 02 and Oxford Archaeology Photos CA6 and CA11 are cases in point,
- d. Update Oxford Archaeology Figure CA7 to show all locally listed buildings adjacent to the site as they are clearly part of the Setting as well as the footprints of the completed buildings at Dickens Yard,
- e. With regard to Oxford Archaeology Photo CA7 a heritage assessment of the impact of the loss of views (View 07A) of the clock tower from Dickens Yard,
- f. All plans and elevations to include the locations and profiles of buildings adjoining the site perimeter sufficient to enable impacts on them to be assessed,
- g. ensure all Reports include and assess the scheme based on the submission plans, including the Refinement of Proposals,
- h. landscaping details for the enclosed courtyards,
- i. address comments from Energy, Transport and Pollution Technical,
- j. Draft agreement or Heads of Terms at least of a s106 agreement to deliver the restoration and improvements to the building (as outlined in the Building Condition Survey and Repair and Restoration Strategy) and delivery of the community access arrangement to the building (as outlined in the SCI),
- k. You indicate in the SCI your Client's commitment to ongoing engagement and dialogue with local residents as the planning and construction progresses. Your SCI accompanying the application should set out how you intend to deliver this as well as fully respond to the representations.

Please note failure to provide all of the above information with your planning application is likely to lead to delays in the application being validated.

### **Disclaimer**

The advice given by Council officers in response to pre-application enquiries does not bind the Council's decision making or constitute a formal decision by the Council as Local Planning Authority. Any views or opinions expressed are given in good faith and to the best of our ability without prejudice to the formal consideration of any planning application following statutory public consultation.

However the written advice provided will be considered as part of the assessment of a future related planning application, subject to the provision that circumstances and information may change or come to light that may alter that position. In this regard the weight given to pre-application advice will decline over time.

### **Conclusion**

Thank you for engaging with the Council to discuss the potential development of the above site. I trust the comments provided in this letter will assist you in developing an acceptable scheme.

The development of this Landmark Ealing Town Hall building in this key heritage and Civic Quarter location and so close to the Filmworks and music/theatre heritage of Ealing centre, provides a unique and exciting opportunity for your Client to fully integrate into this vibrant community and culture and we trust your Client will fully commit to engage with these wider benefits accordingly.

Yours sincerely,



**Gregory Gray**  
Strategic Planning  
London Borough of Ealing  
[grayg@ealing.gov.uk](mailto:grayg@ealing.gov.uk)

## **APPENDIX 1 – Planning Policy Documents**

### **National Planning Policy Framework**

- 2. Achieving sustainable development
- 4. Decision making
- 6. Building a strong, competitive economy
- 7. Ensuring the vitality of town centres
- 9. Promoting sustainable transport
- 12. Achieving well designed places
- 14. Meeting the challenge of climate change, flooding and coastal change
- 16. Conserving and enhancing the historic environment

### **The London Plan 2016 and modifications**

#### Town Centres

- 2.15 – Town centres

#### Economic sectors and workspaces

- 4.5 – London's visitor infrastructure
- 4.6 - Support for and enhancement of arts, culture, sport and entertainment
- 4.7 – Retail and town centre development
- 4.8 – Supporting a successful and diverse retail sector and related facilities and services

#### New and emerging economic sectors

- 4.12 – Improving opportunities for all

#### Climate change mitigation

- 5.1 – Climate change mitigation
- 5.2 – Minimising carbon dioxide emissions
- 5.3 – Sustainable design and construction
- 5.4A – Electricity and gas supply
- 5.6 - Decentralised energy in development proposals
- 5.7 – Renewable energy

#### Climate change adaptation

- 5.9 – Overheating and cooling
- 5.10 – Urban greening
- 5.11 – Green roofs and development site environs
- 5.12 – Flood risk management
- 5.13 – Sustainable drainage
- 5.14 – Water quality and wastewater infrastructure
- 5.15 – Water use and supplies
- 5.17 – Waste capacity
- 5.18 – Construction, excavation and demolition waste
- 5.19 – Hazardous waste

#### Integrating transport and development

- 6.1 – Strategic Approach
- 6.3 – Assessing effects of development on transport capacity

#### Connecting London

- 6.5 – Funding Crossrail and other strategically important transport infrastructure



- 6.9 – Cycling
- 6.10 – Walking
- 6.12 – Road network capacity
- 6.13 – Parking
- 6.14 – Freight

Place shaping

- 7.1 – Lifetime Neighbourhoods
- 7.2 – An inclusive environment
- 7.3 – Designing out crime
- 7.4 – Local character
- 7.5 – Public realm
- 7.6 – Architecture

Historic environment and landscapes

- 7.8 – Heritage assets and archaeology
- 7.9 – Heritage-led regeneration

Safety, security and resilience to emergency

- 7.13 – Safety, security and resilience to emergency

Air and noise pollution

- 7.14 – Improving air quality
- 7.15 – Reducing and managing noise, improving and enhancing the acoustic environment and promoting appropriate soundscapes

Protecting London's open and natural environment

- 7.21 – Trees and woodlands

Planning Obligations and the Community Infrastructure Levy

- 8.2 – Planning Obligations

**Draft London Plan, 2018**

- Policy SD6 Town centres and high streets
- Policy SD7 Town centres: development principles and Development Plan Documents
- Policy D1 London's form and characteristics
- Policy D2 Delivering good design
- Policy D3 Inclusive design
- Policy D7 Public realm
- Policy HC1 Heritage conservation and growth
- Policy HC6 Supporting the night-time economy

**London Tourism Strategy**

**London Tourism Action Plan 2009-13**

**Ealing Development (Core) Strategy 2026 (2012)**

- 1.1 – Spatial Vision for Ealing 2026
- 1.2 – Delivery of the vision for Ealing
- 2.1 – Realising the potential of the Uxbridge Road/ Crossrail Corridor
- 2.5 – Revitalise Ealing Metropolitan Town Centre



- 6.1 - Physical infrastructure
- 6.2 - Social infrastructure
- 6.3 - Green infrastructure
- 6.4 - Planning obligations and legal agreements

**Ealing Development Management Development Plan Document (2013)**

*Ealing local variations to the London Plan*

- 4.5 – London’s Visitor Infrastructure
- 5.2 - Minimising carbon dioxide emissions
- 5.11 - Green roofs and development site environs
- 5.12 - Flood risk management
- 7.3 - Designing out crime
- 7.4 - Local character
- 7.12 - London View Management Framework

*Local policy*

- 4C – Main town centre uses
- 7A - Amenity
- 7B - Design amenity
- 7C - Heritage
- EA - Presumption in favour of sustainable development

**Central Ealing Neighbourhood Plan (2017)**

- E3 Mixed use development
- HBE1 Quality of design
- HBE2 Protecting the townscape
- CC2 Community and Cultural Facilities

**Supplementary Planning Documents**

- Sustainable Transport for New Development (Adopted 2013)
- Legal Agreements, Planning Obligations and Planning Gain

**Supplementary Planning Guidance**

- SPG 3 – Air Quality
- SPG 4 – Refuse and recycling facilities
- SPG 9 – Trees and development guidelines
- SPG 10 – Noise and vibration

**Appendix 2 – Report by Alan Baxter Ltd.**

(See Attachment)

## **Appendix 4 - PAYE Stone Masons Advice**

## Zsolt Moldan

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**From:** David Manktelow [DavidManktelow@paye.net]  
**Sent:** 16 November 2018 11:26  
**To:** Zsolt Moldan  
**Subject:** RE: Ealing Town Hall rose window  
**Attachments:** Previous Experience.pdf

Zsolt,

Further to your recent email I am pleased to respond with initial thoughts on the proposed removal and relocation of the existing East elevation rose window.

In theory it should be possible to carefully remove the masonry that forms the window but this would be subject to the stones current structural condition, its integrity and that of any previous repairs to enable deconstruction without damage or need for replacement.

A detailed structural condition survey and development of a methodology for temporary support of associate brickwork and subsequent removal will be required. A similar approach will be required for the reinstatement of the window into the proposed new location to help ascertain the suitability of the structure. We would be pleased to help at this stage and provide costs accordingly.

We regularly provide early stage technical advice, survey reports, budgets and development of methodologies to assist with planning applications involving traditional and listed masonry buildings. I would be pleased to meet and discuss any requirements that you may have for the external and internal development and refurbishment of the building relating to existing masonry materials and finishes.

Please find attached examples of masonry deconstruction, salvage and re-use.

Regards

David Manktelow  
PAYE  
T: 020 8857 9111 | M: 07852 417747  
[www.PAYE.net](http://www.PAYE.net) | [www.PAYEconservation.net](http://www.PAYEconservation.net)

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**From:** Zsolt Moldan <ZsoltMoldan@adzarchitects.com>  
**Sent:** 31 October 2018 15:45  
**To:** David Manktelow <DavidManktelow@paye.net>  
**Subject:** FW: Ealing Town Hall rose window

Dear David

Further to my call to you I have attached photos of the rose window as well as a photo inside the Hall where we would wish to relocate the rose window with back lighting

I would be grateful for your thoughts/advice on this

Kind regards

Zsolt

**Zsolt Moldán**  
**Director**

**ADZ Architects**

One Bonny Street, London, NW1 9PE  
Tel: 020 7485 9029  
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Registered in England No. 4584971

Registered Office C/O Tuite Tang Wong, Alliance House, 2<sup>nd</sup> Floor, 29-30 High Holborn, WC1V 6AZ  
VAT Registered Vat No. 802487045

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**From:** [copier@goddardmanton.com](mailto:copier@goddardmanton.com) [<mailto:copier@goddardmanton.com>]

**Sent:** 31 October 2018 16:39

**To:** Zsolt Moldan

**Subject:** Ealing Town Hall rose window



Contract: Aston Webb Screen, V&A  
Client: V&A, Christina Bailey  
c.bailey@vam.ac.uk

Main Contractor: PAYE Limited

Value: £1 million  
Date: 2013— 2017

Scope: As part of the major re-development of the courtyard to provide additional exhibition space the Grade 1 listed Aston Webb screen was deconstructed to provide site access and excavation of the space.

Following a detailed photographic and dimensional survey PAYE's masons began the careful and meticulous process of dismantling the masonry screen using modern and traditional techniques to cut through joints and separate the solid sections of stone.





Each joint was carefully cut out to prevent the risk of damage to adjacent stones. Using traditional plug and feathers the stones were split apart breaking the mortar used to bond them together.

Some of the larger stones weighed up to 1 tonne, using a block and tackle fixed to a running rail and padded lifting straps the stones were lifted away and lowered to the ground onto pallets and transportation to PAYE's secure storage facility.





The completed re-constructed Grade 1 listed screen has been significantly altered removing the original rusticated wall and balustrade to provide new openings created through the columns providing a free flow access to the new courtyard and exhibition galleries.



## Previous Experience



Contract: Eagle Place, Piccadilly. Part of the Gateway Project  
Client: Crown Estate, Alistair Smart  
Tel: 020 7851 5000  
[alistair.smart@thecrownestate.co.uk](mailto:alistair.smart@thecrownestate.co.uk)

Value: £1.2 million  
Date: 2010—2012

Scope: This Grade 1 listed Portland stone façade was dismantled stone by stone and put into storage for 12 months. Following on site construction the masonry was returned and the facade re-constructed together with new stonework to the ground floor re-instating missing original detailing. Of the 1800 individual stones salvaged only 4 required replacement that were found to be too damaged for re-use.



## Previous Experience



The original façade has been re-built as single bonded construction. The masonry wall was restrained back to the new internal frame at each floor level with stainless steel brackets which allowed the two to move independently of each other.