

**Recreation Road  
Southall**  
London Borough of Ealing  
UB2 5PE

**RISK ASSESSMENT:  
Cultural Heritage**

**January 2025**



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Cultural Heritage**

**Sign-off history**

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Fig 1 Historic environment features map

Historic Ordnance Survey mapping has been appended to the report.

## Glossary

<b>Archaeological Desk Based Assessment</b>	A document which assesses, as far as is reasonably possible from existing records and site inspection, the nature and significance of buried heritage assets within a specified area, and which may be submitted as part of a planning application.
<b>Built heritage</b>	Upstanding structure of historic interest.
<b>Buried heritage</b>	Archaeological remains, usually below ground level and not visible.
<b>Curtilage</b>	Land and buildings which are 'part and parcel' of the land associated with a building. Buildings within the curtilage of a listed building that have been part of the land since before 1st July 1948 form part of the designation.
<b>Evaluation (archaeological)</b>	A limited programme of non-intrusive and/or intrusive fieldwork which aims to determine the presence or absence of archaeological features, structures, deposits, artefacts or ecofacts within a specified area.
<b>Excavation (archaeological)</b>	A programme of controlled, intrusive fieldwork with defined research objectives which examines, records and interprets archaeological remains, and retrieves artefacts, ecofacts and other remains within a specified area. The records made and objects gathered are studied and the results published in detail appropriate to the project design.
<b>Geotechnical</b>	Ground investigation, typically in the form of boreholes and/or trial/test pits, carried out for engineering purposes to determine the nature of the subsurface deposits. Archaeological monitoring of geotechnical works can be a cost effective means of carrying out two required investigations at the same time.
<b>Heritage asset</b>	A building, monument, site, place, area or landscape positively identified as having a degree of significance meriting consideration in planning decisions. Heritage assets are the valued components of the historic environment. They include designated heritage assets and assets identified by the local planning authority (including local listing).
<b>Heritage Statement</b>	A document which assesses the nature and significance of above ground (built) heritage assets within a specified area. This might be used to support an application for Listed Building Consent.
<b>Historic Environment Record (HER)</b>	Archaeological database held and maintained by the County authority. In some counties this is named the HER (Historic Environment Record), where the built heritage data has been incorporated.
<b>Made ground</b>	Artificial deposit. An archaeologist would differentiate between modern made ground, containing identifiably modern inclusions such as concrete or plastic, and undated made ground, which may potentially contain deposits of archaeological interest.
<b>Mitigation or offsetting</b>	Archaeological strategy where remains of heritage interest are fully investigated and recorded archaeologically and the results published at a level appropriate to the significance of the remains, to generate public benefits from the new knowledge. For remains of lesser significance, this might comprise an archaeological watching brief. For built heritage, this might comprise standing building recording (see below).
<b>Preservation in situ</b>	Mitigation strategy where nationally important (whether Scheduled or not) archaeological remains are preserved <i>in situ</i> for future generations, typically in a development context by design proposals which avoid damage or removal of such remains.
<b>Residual</b>	When used to describe archaeological artefacts, this means not <i>in situ</i> , i.e. found outside the context in which it was originally deposited, mixed with later remains.
<b>Site</b>	The area of proposed development
<b>Standing building recording</b>	A programme of work to establish the character, history, dating, form and archaeological development of an above ground heritage asset and its setting, including buried components. The purpose is to inform a strategy for its conservation, alteration, demolition, repair or management, and/or to enhance understanding and compile an accessible archival record and illustrated report.
<b>Study area</b>	Defined area surrounding the proposed development in which heritage data is collected and analysed in order to set the site into its archaeological and historical context.
<b>Truncate</b>	Partially remove. In archaeological terms remains may have been truncated by subsequent construction activity.
<b>Watching brief (archaeological)</b>	A formal programme of observation, investigation and recording conducted during any operation carried out for non-archaeological reasons.

# Results

*This **Heritage Risk Assessment** constitutes a preliminary desktop survey, outlining the likely risk to future development of the site in terms of heritage assets (archaeological remains and buildings or structures of heritage interest). It does not constitute an Archaeological Desk-Based Assessment/Heritage Statement or a Built Heritage Statement which may be required as part of a planning application and as such should not be submitted to the local planning authority.*

## **Above ground heritage: negligible risk.**

*There are no nationally or locally Listed buildings in the vicinity of the site, and it is therefore considered very unlikely that development of the site would have an impact on the setting of built heritage assets in the area. The site is not located within a Conservation Area. As such, development of the site poses a negligible risk to above ground heritage.*

## **Buried heritage: low risk.**

*The site is not located within an Archaeological Priority Area. The site area is less than 0.03ha and there is considered to be very limited archaeological potential other than for isolated prehistoric finds such as have been recovered elsewhere in the study area. The site was not built on until the 20th century and there is some potential for post-medieval agricultural remains reflecting its earlier history. No Roman or medieval remains have been identified within the study area.*

*It is nevertheless possible that an archaeological Desk-Based Assessment (DBA) would be required by Ealing Council as part of a planning application submitted for future development. Depending on the results, targeted archaeological field investigation may subsequently be requested, or archaeological monitoring during groundworks.*

## **Potential opportunities associated with archaeology**

*It may be possible to develop opportunities around archaeology for public engagement and Social Value, together with positive material for communication about the development. Examples of activities might include newsletters, 'pop-up presentations and/or presence at target local events, visits by archaeologists to local schools for sessions on the archaeology and history of the area, open days for the local community and local oral history projects, and digital engagement with local stakeholders.*

# 1 Introduction

## 1.1 Background

- 1.1.1 This Cultural Heritage Risk Assessment has been prepared by MOLA (Museum of London Archaeology) for the site at Recreation Road, Southall UB2 (National Grid Reference TQ121788) in the London Borough of Ealing.
- 1.1.2 The National Planning Policy Framework (Ministry of Housing, Communities & Local Government, December 2024) defines a heritage asset as “*a building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing)*”. Such assets might comprise below and above ground archaeological remains, buildings, structures, monuments or heritage landscape within or immediately around the site.
- 1.1.3 Provision for the safeguarding of heritage assets has been made at a national and local level (see section 6). For this reason, their presence or potential presence may affect the initial selection of development options on the client property (hereafter referred to as ‘the site’) and the subsequent design, planning and programming of any future development. This document therefore aims to provide a top-level appraisal of the known and likely heritage assets specific to the site and flag up potential issues so that they may be anticipated and planned for, and so that the opportunities and benefits which heritage can bring to a development can be realised.
- 1.1.4 This report can be used to inform pre-planning application discussions with the local planning authority (LPA). It does not constitute an Archaeological Heritage Statement or Desk-Based Assessment (DBA) or Built Heritage Statement (HS) often required by the LPA to accompany a planning application. It is a preliminary scoping of any predicted heritage constraints, as a commercial appraisal for the client. **The report should not be submitted to the LPA as part of a planning application.**
- 1.1.5 The assessment is made from key sources and information immediately available (see section 2). The report is indicative only and does not purport to be exhaustive. Information in this document is, to the best knowledge of the author and MOLA, correct at the time of writing. MOLA will not be responsible for any future use made of this document not related to its intended purpose. Under the ‘Copyright, Designs and Patents Act’ 1988 MOLA retains the copyright to this document.

## 1.2 Aims and objectives

- 1.2.1 The aim of the document is to provide an indication of:
- the presence of designated (i.e., protected through national or local planning policy) and known or likely non-designated upstanding or buried heritage assets within the site or its immediate vicinity;
  - the known or likely significance of such assets;
  - previous impacts which may have affected heritage asset survival;
  - the likely implications for any future development on the site in terms of constraints and possible time/cost issues; and
  - how heritage can deliver public benefit as part of development.

## 1.3 Types of heritage risk

- 1.3.1 Heritage risk is defined as follows:
- **High risk.** A site with one or more of the following: severe constraints on future development in terms of architectural or engineering design due to highly sensitive heritage assets, with the possibility of refusal of planning consent due to an unacceptable heritage impact; likely significant cost and time implications from heritage investigation and mitigation requirements (e.g., or standing building

recording, or full archaeological excavation). If planning consent is granted it will be with a heritage planning condition. In exceptional circumstances for remains of high enough significance (i.e. a Scheduled Monument or equivalent) adjustments to the design of a proposed development may be required to allow for preservation of archaeological remains *in situ*.

- **Moderate risk.** A site with one or more of the following: constraints on future development that would need careful consideration in terms of scheme design due to the presence of heritage assets; likely cost and time implications from heritage evaluation and mitigation requirements (e.g. standing building recording, limited archaeological investigation). Planning consent is likely to be granted but will probably include a heritage planning condition.
- **Low risk.** A site with few or no heritage constraints on future development. Limited archaeological investigation and/or standing building recording may be required but this is unlikely to have significant cost and time implications.

1.3.2 Although a site may be assessed as moderate or high risk, this may not be a barrier to planning consent where proposals for future development or use are likely to have no adverse impact on heritage assets.

## 1.4 Opportunities

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1.4.1 With careful planning, heritage can provide opportunities: sensitive sustainable development can enhance the significance of a heritage asset, contribute to place-making and engage the local community, with the benefit of increasing company profile and providing marketing material for promoting a development. Further details of the social value of archaeology is discussed in Section 5.3.

## 2 Scope

- 2.1.1 This survey reviews listed buildings within the site and a 300m-radius around it, and any other statutorily designated heritage assets and non-designated heritage assets recorded within the site and a 750m-radius study area around it in order to identify the key heritage issues for any future development.
- 2.1.2 For archaeology, an outline assessment is made of how past land use may have compromised the survival of any buried heritage assets which might be present on the site, along with an initial statement of likely potential for buried heritage assets to be present. Table 1 indicates those sources consulted for the survey.

*Table 1: Data sources consulted.*

Source	Data	Reason
Historic England publicly available data	World heritage sites Scheduled monuments Statutorily listed buildings Certificate of Immunity from Listing Registered battlefields Protected wrecks Registered parks and gardens	Statutory designations that can provide a significant constraint to development.
Greater London Archaeological Advisory Service/Historic England	Historic Environment Record (HER) database search for a 500 metre-radius study area around the site	Primary repository of archaeological information within the county. Includes information from past investigations, local knowledge, find spots, and documentary and cartographic sources.
Local Planning Authority	Archaeological priority area/zone	LPA designation of an area of archaeological priority or significance.
Local Planning Authority	Conservation area	LPA designation of an area of special architectural or historic interest the character or appearance of which it is desirable to preserve or enhance.
Local Planning Authority	Locally listed buildings	LPA designation that recognises local architectural or historic interest and is separate from national statutory listing by the Secretary of State.
British Geological Survey (BGS) online data	Geology data	Geology can provide an indication of suitability for early settlement, and potential depth of remains.
Groundsure	Ordnance Survey 25" / 2500/1250 6" / 10,000 scale maps from the 1st edition (1860s/70s) onwards	Historic maps can indicate past land use and impacts which may have compromised archaeological survival, and the possible date of any buildings on the site.

- 2.1.3 The following limitations to the report should be recognised:
- The assessment does not include the consultation of a comprehensive range of sources normally required for a DBA or HS to accompany a planning application (e.g. documentary, cartographic, air photographic, and geotechnical, architectural and engineering data).
  - No site walkover/inspection has been carried out. For this reason, it is possible that there are undesignated above ground assets within the site which have not been identified.
  - Archaeological remains are buried and not visible. In the absence of intrusive archaeological field investigation, it is possible that there are buried assets within the site that have not been identified.
  - Burial grounds have been identified from historic Ordnance Survey mapping and the sources set out above only. Where a site is close to a former burial ground,



consultation of a more comprehensive range of sources would be required to determine the likely presence or absence of human remains within the site.

## 3 Known heritage assets

### 3.1 Heritage assets within the study area

- 3.1.1 Fig 1 shows the location of recorded heritage assets, both designated and non-designated, within the 750m-radius study area. This data is held by the Greater London Historic Environment Record (GLHER), one of the primary sources of such information in London. The GLHER is managed by Historic England and includes information from past investigations, local knowledge, find spots, and documentary and cartographic sources. Conservation areas, archaeological priority areas and locally listed buildings are not shown on Fig 1, although they are discussed in the report where relevant.
- 3.1.2 Assets have been allocated a unique Risk Assessment reference number (**RA 1, 2**, etc) with a summary included in Table 2 and Table 3 below.

### 3.2 Designated heritage assets

- 3.2.1 Designation includes statutory protection for nationally significant assets, and other local designations identifying an asset which may be a material consideration in the planning process.
- 3.2.2 National planning policy<sup>1</sup> requires that the impact of proposed development on the setting of a designated asset should be taken into account in the determination of planning applications.
- 3.2.3 Nationally designated assets within the study area are described in Table 2 and shown on Fig 1.

Table 2: Nationally designated heritage assets within the study area.

RA No.	Description	NHL Reference
1	<b>Southall Manor House, The Green</b> <i>Grade II* Listed building</i> Late 16th century manor house with 18th, 19th and 20th century alterations.	1079419
2	<b>Featherstone Boys School War Memorial, Western Road</b> <i>Grade II Listed building</i> War memorial unveiled in 1921 to designs by W T Curtis.	1455366
3	<b>Southall War Memorial, Manor House Grounds</b> <i>Grade II Listed building</i> War memorial unveiled in 1922, and with Second World War additions.	1440943

- 3.2.4 There are no nationally designated heritage assets within the site, and the site is not located within a Conservation Area or an Archaeological Priority Area. The nearest listed building to the site is Southall Manor House (**RA 1**), approximately 680m north-east.

### 3.3 Non-designated heritage assets

- 3.3.1 Non-designated heritage assets, as recorded on the GLHER, are described in Table 3 and shown on Fig 1.

<sup>1</sup> Ministry of Housing, Communities and Local Government 2024 *National Planning Policy Framework*.

Table 3: Non-designated heritage assets.

RA No.	Description	GLHER Reference
4	<b>Florence Road / Montague Road</b> <i>Prehistoric findspot</i> A gold Gallo-Belgic B (Bellovaci) Stater (coin) from the early Iron Age was found in the vicinity of what is now Featherstone High School.	139060
5	<b>Southall Lane / The Common / M4 motorway</b> <i>Post medieval feature</i> The site of Heston Aerodrome, a pre-war civil airfield and World War Two military airfield, now mostly built over.	225238
6	<b>Wentworth Road / North Hyde Lane</b> <i>Prehistoric findspot</i> Lithic implements dated to the Lower Palaeolithic were recovered.	98879
7	<b>North Hyde Lane</b> <i>Medieval feature</i> The site of a medieval settlement on the edge of Heston, as shown on Glover's map.	105269
8	<b>Norwood Road</b> <i>Prehistoric findspot</i> Lower Palaeolithic implements including nine hand-axes, one roughout, one retouched flake and five flakes were found at Southall, Norwood Green, and vicinity. The objects were found in an area of Lynch Hill Gravel geology.	133743
9	<b>King Street / Western Road</b> <i>Post medieval feature</i> Burial ground of St John's Church, dating to the 19th century.	101793
10	<b>Havelock Road</b> <i>Post medieval feature</i> Site of Havelock Cemetery, which opened in 1883.	133152
11	<b>Manor House Grounds, The Green</b> <i>Post medieval feature</i> Elizabethan formal garden, now a public garden.	117876
12	<b>Featherstone Road</b> <i>Prehistoric findspot</i> A Lower Palaeolithic hand-axe was found in an area of brickearth on Lynch Hill Gravel geology.	132689

## 3.4 Past archaeological investigations

- 3.4.1 A search of the GLHER was returned on the 6th of January 2025 (licence ref. 18920). There have been no archaeological investigations undertaken within the site. Within the study area there have been five investigations across three sites, although none were within c 400m of the site: Southall Manor (**RA 13**, **RA 14**, **RA 15**, site codes: MNH16/SNX10/SOM05), Shree Ram Mandir Temple (**RA 16**, site code: KNU05), and Sri Guru Singh Sabha Gurdwara (**RA 17**, site code: HCK00).
- 3.4.2 These investigations revealed isolated prehistoric pottery and flint and post medieval refuse pits, drainage features, a levelling deposit and structural remains. No Roman or medieval finds were identified.

Table 4: Archaeological investigations in the study area.

RA No.	Description	Site code/GLHER reference
13	<b>Southall Manor House, The Green</b> <i>Evaluation by Museum of London Archaeology, 2016</i> A levelling deposit sealed beneath a Victorian floor was dated to 1580-1700, and the remains of a brick out building of a probably 19th century date were identified.	MNH16 161773
14	<b>Southall Manor Grounds, The Green</b> <i>Watching brief by Sutton Archaeological Services, 2010</i> The watching brief found a prehistoric pottery sherd, a possible waste flake and a piece of burnt flint along with 20th century building material.	SNX10 153082
15	<b>Southall Manor, The Green</b> <i>Watching brief by Northamptonshire Archaeology, 2005</i> No archaeological deposits or artefacts were observed.	SOM05 153553
16	<b>Shree Ram Mandir Temple, 22 King Street</b> <i>Watching brief by AOC Archaeology, 2005</i> No archaeological finds or features were recorded.	KNU05 161869
17	<b>Sri Guru Singh Sabha Gurdwara, Havelock Road</b> <i>Watching brief by Museum of London Archaeology Service, 2000</i> No archaeological deposits were observed in any of the test pits. An examination was made of underlying river terrace gravels for early human activity or faunal remains, but no evidence was found.	HCK00 152284

### 3.5 Archaeological background and potential

- 3.5.1 The site is located on brickearth, which would have been suitable land for early settlement and farming. However, very few archaeological investigations have taken place within the study area, and none close to the site, so there is limited information available to aid in assessing the archaeological potential of the site. In addition to isolated pottery and flint found during past investigations, a number of prehistoric findspots are recorded within the study area in the GLHER, including an early Iron Age coin and a number of Lower Palaeolithic stone implements. The Roman and medieval periods are not represented in the archaeological record within the study area.
- 3.5.2 The archaeological investigations that have been undertaken within the study area cluster in the north-east, at least 400m away. They identified post-medieval features, mostly related to water and waste management and small-scale construction. Given that the site was likely in fields until the 19th century, it is considered unlikely that any earlier post-medieval remains will be present within the site.
- 3.5.3 However, based on the HER data used for this survey, the potential for archaeological remains on the site is:
- A possibly moderate potential for isolated prehistoric finds;
  - A low potential for Roman remains;
  - A low potential for early medieval remains;
  - A low potential for later medieval remains;
  - A moderate potential for post-medieval agricultural remains.

## 4 Factors affecting archaeological survival

### 4.1 Geology

- 4.1.1 Table 5 indicates the geology type. Geology can provide an indication of suitability for early settlement, and of the potential depth of buried heritage assets. Archaeological features (pits, ditches) may be within the subsoils and cut into the top of the underlying geology, and also buried within deposits such as undated made ground. The results of geotechnical investigations within 300m of the site were obtained from the BGS GeoIndex and were used to indicate the geology of the site.

*Table 5: Geology and archaeological potential.*

Geology type	Comment	Present on site?
Made ground	Modern made ground will be archaeologically sterile. Undated made ground may contain archaeological remains.	There is likely to be made ground across the entire site overlying the brickearth (and possibly gravels), associated with former buildings. The depth of made ground on the site is not known.
Brickearth	Suitable land for early settlement and farming. In urban areas, brickearth was often extracted for building material, which will have entirely removed any earlier archaeological remains.	Yes, across the entirety of the site.
Gravel	Gravels provide well drained and fertile soils, and would have been conducive to early settlement and farming.	Moderate potential to be present, based on presence within nearby boreholes.
Clay	Clay would not have been a first choice for early settlement and farming and generally has lower archaeological potential prior to the post-medieval period.	Yes, underlying the brickearth (and possibly gravels) across the entirety of the site.

### 4.2 Past land use

- 4.2.1 Table 6 uses Ordnance Survey mapping from the 1st edition onwards to identify past land use and impacts which may have compromised the survival of any earlier archaeological remains, if present.

*Table 6: Factors affecting archaeological survival.*

Past impact	Description	Presence within site and approximate proportion of total site area
Standard strip/pad/raft foundations	Ordnance Survey maps show the presence on the site of buildings – likely garages or sheds – predating the mid-20th century. These are likely to have had very shallow foundations. It is possible that the buildings had strip or pad footings which will have removed any archaeological remains locally within the footprint of each construction, typically to a depth of 1.0–1.5 metres below ground level. Archaeological remains, if present, potentially survive between and beneath these localised impacts. Depending on the depth of brickearth and made ground deposits, archaeological remains may survive intact beneath these foundations. Footings of buildings pre-dating the early 20th century are potentially of archaeological interest.	c 30% of the site

Past impact	Description	Presence within site and approximate proportion of total site area
Services/ utilities trenches	Service/utilities/drainage trenches will have removed any archaeological remains locally within the footprint of each trench, typically to a depth of 1.0–2.0 metres below ground level. If made ground is present (see table 4), depending on the depth of these deposits in relation to the depth of the trench, archaeological remains may survive intact beneath.	Present
Open land (urban)	Ordnance Survey maps show that the majority of the site has never been built on. Hardstanding, in particular for the existing garages on the site, is unlikely to have caused a significant impact.  Archaeological survival potential is likely to be high (other than where there are services).	c 70% of the site

- 4.2.2 Early maps do not show the site in detail but indicate that in the 18th century, at least, the general area was mostly agricultural with settlement comprising small roadside villages or hamlets; the site is located on the outskirts of Norwood. Mid-19th century Ordnance Survey maps suggest the site was in an area where willows were grown, probably for use in basket work.
- 4.2.3 The first known development within the site occurred in the early 20th century and comprised three small garage or shed units in the backyard of terraces which fronted Regina Road. The structures have since been replaced with nine garages and a parking area.

## 5 Heritage constraints and opportunities

### 5.1 Designated heritage assets

- 5.1.1 The above ground heritage risk is **negligible**. The site does not fall within a Conservation Area (CA), nor does it contain any statutorily designated above ground heritage assets. The nearest Listed building to the site is c 680m to the north-east, and developments within the site would therefore not impact the setting of nearby heritage assets.
- 5.1.2 In view of this, it is unlikely that the LPA will require any further above ground heritage investigation, such as a Built Heritage Statement, to be completed prior to planning consent.

### 5.2 Non-designated buried heritage assets

- 5.2.1 The buried heritage risk is **low**. The main archaeological potential for the site is for isolated prehistoric finds such as pottery, flint, and coins such as those recovered in the study area and which may simply demonstrate a general 'background' potential for such finds. There is some potential for post-medieval agricultural remains.

### 5.3 What next?

#### *General planning considerations*

- 5.3.1 Where a site includes designated above ground heritage assets, is in an area considered by the statutory consultees (the LPA and their advisors) to have historic environment potential, and/or if the site covers a large area, the LPA is likely to require an Archaeological Desk-Based Assessment (DBA) and/or a Built Heritage Statement (HS) as part of a planning application. The aim would be to quantify the potential and significance of heritage assets within the site, and how such assets would be affected by future development. National planning policy encourages LPAs to take account of the desirability of sustaining and enhancing the significance of heritage assets when determining planning applications.
- 5.3.2 With very few exceptions, works (including extension, alteration and demolition in whole or in part) affecting the exterior or interior of a listed building of any grade, its curtilage and/or any artefacts/structures/elements affixed to it require listed building consent in addition to any other permissions or licences that might apply (e.g. Planning Permission, Building Regulations approval, etc.) Demolition, with few exceptions, of a building in a Conservation Area requires planning permission (the need for separate Conservation Area Consent was abolished in 2013), and failure to have such permissions is a criminal offence. The setting of a listed building is of heritage interest in its own right and is a material consideration in the determination of any planning application likely to affect it.
- 5.3.3 Where the DBA or HS is not able to establish with any confidence the presence, nature, extent, date, preservation or significance of heritage assets affected by the proposals, the LPA may require site-based archaeological field evaluation (trial trenches/pits/boreholes/standing building survey) in order to be able to make an informed decision in respect of an appropriate mitigation response to any heritage assets present.
- 5.3.4 Nationally significant assets, whether designated or not, normally require preservation *in situ*. This clearly has implications regarding the granting of planning permission and can represent a significant constraint to any proposed scheme design, which should respect, retain and protect the remains. If the site has the potential to affect suspected assets of national significance, the LPA and Historic England may require preliminary site-based evaluation prior to the determination of a planning application. This ensures that the LPA retains the option of preservation *in situ* if such assets are found to be present.
- 5.3.5 If the site is unlikely to contain any remains of national significance, for example because of the known or likely extent of past impact/truncation (which will have compromised asset survival and significance), then it is more usual for the LPA to request preliminary site-based evaluation under the terms of a standard planning condition. Depending on the results, this might require further work to offset the impact of the scheme on assets of lesser significance

which would be removed. This is likely to comprise archaeological investigation and recording (i.e. excavation and/or a watching brief and/or standing building recording), with appropriate dissemination of the results for public benefit.

### *Considerations for the site*

- 5.3.6 The site is not located within an Archaeological Priority Area and the site area is less than 0.03ha. If a planning application is submitted for future development, it is however possible that an archaeological Desk-Based Assessment (DBA) would be required as part of the application in order to determine fully the likely archaeological impact of the proposals. This would include a full assessment of available historic maps and a site visit to assess past impacts and land use. Depending on the results, targeted archaeological field investigation may subsequently be requested by the LPA, or archaeological monitoring during groundworks. The most appropriate mitigation strategy would be discussed as part of the conclusions of the DBA.

### *Potential opportunities associated with archaeology*

- 5.3.7 In some cases it may be possible to develop opportunities for public engagement and Social Value around archaeology, together with positive communication about the development. Examples of activities include:
- Information about the archaeology on site hoardings;
  - Visits by archaeologists to local schools for sessions on the archaeology and history of the area;
  - Open days for the local community.
- 5.3.8 Such events have been undertaken by MOLA as part of the archaeological works at a range of sites and locations.
- 5.3.9 An infographic showing how archaeology and Social Value fit into the development process has been appended to this report.

## **5.4 Further information**

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- 5.4.1 If you would like further information on our range of commercial services, and how we can help deliver Social Value, please contact [hello@mola.org.uk](mailto:hello@mola.org.uk) or call 0800 208 4015.



## 6 Appendix: Planning framework

### 6.1 National Planning Policy Framework

- 6.1.1 The National Planning Policy Framework (NPPF) was revised in response to the Proposed reforms to the National Planning Policy Framework and other changes to the Planning system consultation on 12 December 2024 and sets out the government's planning policies for England and how these are expected to be applied. This revised framework replaces the previous NPPF published in March 2012, revised in July 2018, updated in February 2012, revised in July 2021, updated in September 2023 and revised in December 2023.

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

- 6.1.2 The NPPF section 16, "Conserving and enhancing the historic environment" (NPPF paragraphs 202–221) is reproduced in full below:

**202.** Heritage assets range from sites and buildings of local historic value to those of the highest significance, such as World Heritage Sites which are internationally recognised to be of Outstanding Universal Value. These assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of existing and future generations.

**203.** Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:

- a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation;
- b) the wider social, cultural, economic and environmental benefits that conservation of the historic environment can bring;
- c) the desirability of new development making a positive contribution to local character and distinctiveness; and
- d) opportunities to draw on the contribution made by the historic environment to the character of a place.

**204.** When considering the designation of conservation areas, local planning authorities should ensure that an area justifies such status because of its special architectural or historic interest, and that the concept of conservation is not devalued through the designation of areas that lack special interest.

**205.** Local planning authorities should maintain or have access to a historic environment record. This should contain up-to-date evidence about the historic environment in their area and be used to:

- a) assess the significance of heritage assets and the contribution they make to their environment; and
- b) predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

**206.** Local planning authorities should make information about the historic environment, gathered as part of policy-making or development management, publicly accessible.

#### **Proposals affecting heritage assets**

**207.** 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.

**208.** Local planning authorities should identify and assess the particular significance of any heritage asset that may be affected by a proposal (including by development affecting the setting of a heritage asset) taking account of the available evidence and any necessary

expertise. They should take this into account when considering the impact of a proposal on a heritage asset, to avoid or minimise any conflict between the heritage asset's conservation and any aspect of the proposal.

**209.** Where there is evidence of deliberate neglect of, or damage to, a heritage asset, the deteriorated state of the heritage asset should not be taken into account in any decision.

**210.** In determining applications, local planning authorities should take account of:

- a) the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation;
- b) the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and
- c) the desirability of new development making a positive contribution to local character and distinctiveness.

**211.** In considering any applications to remove or alter a historic statue, plaque, memorial or monument (whether listed or not), local planning authorities should have regard to the importance of their retention in situ and, where appropriate, of explaining their historic and social context rather than removal.

### **Considering potential impacts**

**212.** When considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight should be). This is irrespective of whether any potential harm amounts to substantial harm, total loss or less than substantial harm to its significance.

**213.** Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. Substantial harm to or loss of:

- a) grade II listed buildings, or grade II registered parks or gardens, should be exceptional;
- b) assets of the highest significance, notably scheduled monuments, protected wreck sites, registered battlefields, grade I and II\* listed buildings, grade I and II\* registered parks and gardens, and World Heritage Sites, should be wholly exceptional.

**214.** Where a proposed development will lead to substantial harm to (or total loss of significance of) a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or total loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply:

- a) the nature of the heritage asset prevents all reasonable uses of the site; and
- b) no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and
- c) conservation by grant-funding or some form of not for profit, charitable or public ownership is demonstrably not possible; and
- d) the harm or loss is outweighed by the benefit of bringing the site back into use.

**215.** Where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal including, where appropriate, securing its optimum viable use.

**216.** The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

**217.** Local planning authorities should not permit the loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

**218.** Local planning authorities should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

**219.** Local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites, and within the setting of heritage assets, to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to the asset (or which better reveal its significance) should be treated favourably.

**220.** Not all elements of a Conservation Area or World Heritage Site will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area or World Heritage Site should be treated either as substantial harm under paragraph 214 or less than substantial harm under paragraph 215, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area or World Heritage Site as a whole.

**221.** Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.

## 6.2 Regional Planning Policy

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### *The London Plan*

6.2.1 The overarching strategies and policies for the whole of the Greater London area are contained within *The London Plan: The Spatial Development Strategy for Greater London* (GLA 2021), adopted in March 2021.

6.2.2 Policy HC1 “Heritage conservation and growth” of the *Publication London Plan* relates to London’s historic environment.

A Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London’s historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.

B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London’s heritage in regenerative change by:

- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making
- 2) utilising the heritage significance of a site or area in the planning and design process
- 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
- 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.

C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets’ significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings, should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.

D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

6.2.3 Para. 7.1.8 adds ‘Where there is evidence of **deliberate neglect** of and/or damage to a heritage asset to help justify a development proposal, the deteriorated state of that asset should not be taken into account when making a decision on a development proposal’.

6.2.4 Para 7.1.11 adds ‘Developments will be expected to avoid or minimise harm to significant archaeological assets. In some cases, remains can be incorporated into and/or interpreted in

new development. The physical assets should, where possible, be made available to the public on-site and opportunities taken to actively present the site's archaeology. Where the archaeological asset cannot be preserved or managed on-site, appropriate provision must be made for the investigation, understanding, recording, dissemination and archiving of that asset, and must be undertaken by suitably-qualified individuals or organisations.

## 6.3 Local Planning Policy

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- 6.3.1 Ealing's Development Strategy 2026 (also known as the Core Strategy DPD) was adopted on 3 April 2012 and sets out a vision for the future development of the borough and covers a 15-year plan period up to 2026.

**Policy 1.2: Delivery of the Vision for Ealing 2026**

1.2 (g) To support the proactive conservation and enjoyment of Ealing's heritage assets and their significance. In this regard the Council will continue to update and revise its evidence relating to the Borough's designated and undesignated heritage assets. In particular, we will regularly review our Conservation Area Appraisals and Management Plans and review and update our Register of Local Heritage Assets to ensure that local assets are identified and their significance properly understood during the planning process. In addition to promote heritage led regeneration, ensure a balanced approach to climate change measures, encourage greater understanding and access to heritage assets and reduce the number of assets at risk.

- 6.3.2 The Development Management Development Plan Document (also known as the Generic Development Control/Management DPD) seeks to guide decisions on planning applications where no provision has been made elsewhere (e.g. the London Plan) and where, because of the unique characteristics of Ealing we feel a more distinctive approach needs to be taken. The council adopted the Development Management DPD on 10 December 2013.

**Policy 7c: Ealing Local Policy – Heritage**

Planning Decisions

A Development of heritage assets and their settings should;

- a) be based on an analysis of their significance and the impact of proposals upon that significance.
- b) conserve the significance of the asset in question.
- c) protect and where appropriate restore original or historic fabric.
- d) enhance or better reveal the significance of assets.

B Development within or affecting the setting of Conservation Areas should;

- a) retain and enhance characteristic features and detailing and avoid the introduction of design and materials that undermine the significance of the conservation area.
- b) retain elements identified as contributing positively and seek to improve or replace elements identified as detracting from the Conservation Area

C The significance of heritage assets should be understood and conserved when applying sustainable and inclusive design principles and measures.

D Harm to any heritage asset should be avoided. Proposals that seek to cause harm should be exceptional in relation to the significance of the asset, and be clearly and convincingly justified in line with national policy.

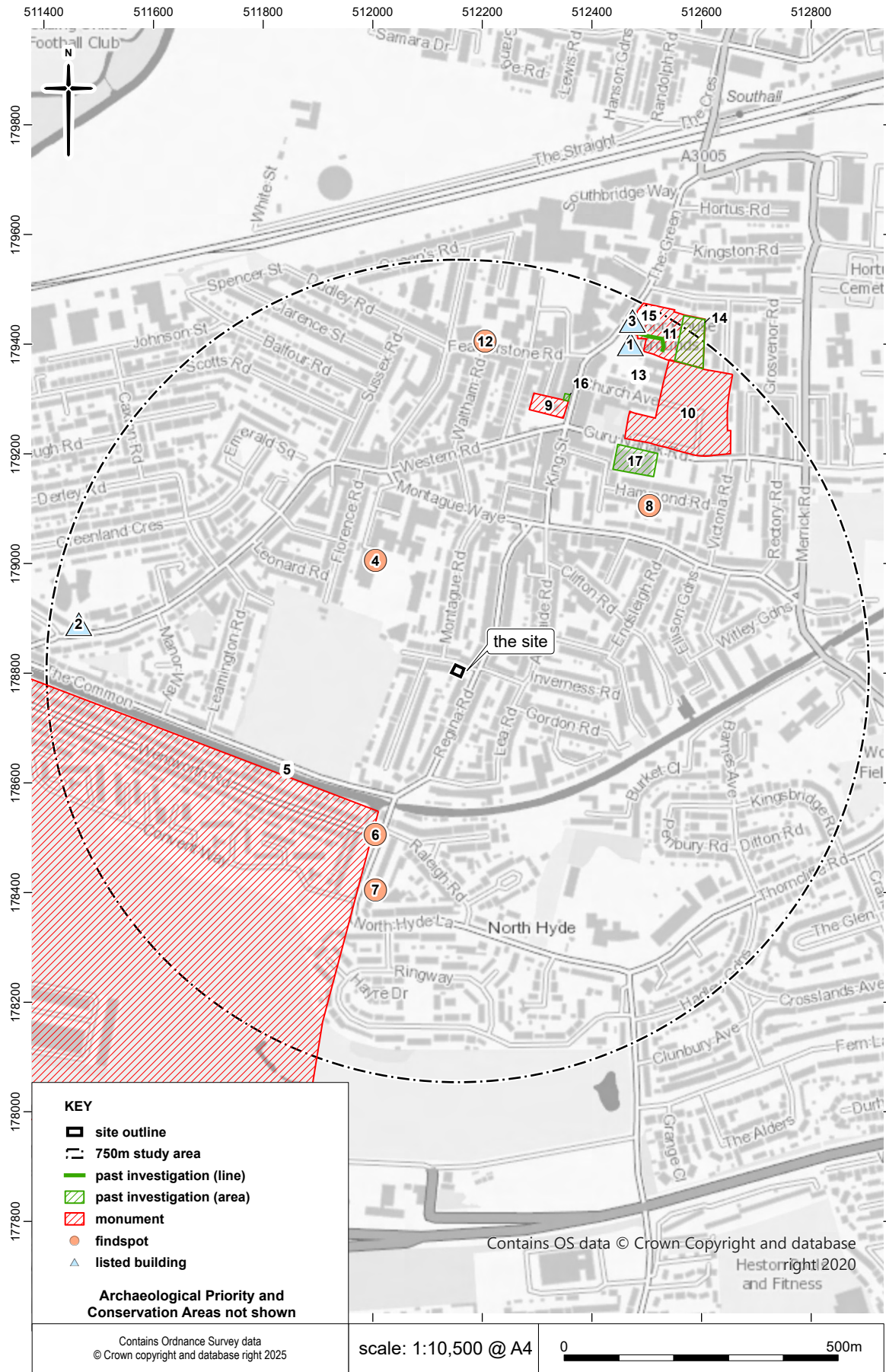


Fig 1 Historic environment features map



RIBA Stage	0	1	2	PLANNING CONSENT	3	4	5	6	7	
Community Benefits	Consultation, Empowerment, Participation			ENGAGEMENT WITH PLANNING PROCESS	Learning, Skills, Employment, Wellbeing			Identity, Cohesion, Environmental Awareness		
Project Benefits	Maximising value from archaeology and/or local heritage; informed design; community relationships; diversity; commitment to Social Value and sustainable development			DEMONSTRABLE PUBLIC BENEFIT	Marketing and Placemaking; Employment; Skills; Measurable Social Value			Unique developments; Continuing engagement & activity with occupiers and community; Positive impact on brand reputation		
Archaeological stage	Early appraisal	Desk-based assessment for planning	Evaluation/field testing	PLANNING CONSENT WITH CONDITIONS	Preparing the Written Scheme of Investigation	Excavation, watching brief, post-excavation research and reporting according to Written Scheme of Investigation		Promoting the archaeological story		
Developer/ Project Manager Actions	Ask a question about archaeological opportunities for Social Value generation	Identify design opportunities, community collaborators & audiences; Identify heritage-inspired Social Value goals, KPIs and evaluation strategy; Record baseline evaluation data; Ensure planning documents highlight pathways to Social Value production incorporating archaeological opportunities and community priorities		MAKE POSITIVE CONTRIBUTION TO APPLICATION	Engage project team in implementation; Incorporate archaeology training; Facilitate Social Value-led community programmes and engagement opportunities; Evaluate impact; Promote positive communication about the archaeology and history of the site			Archaeology contributes to the legacy of the project		
Archaeologist Actions	Identify archaeological or heritage-based opportunities for design, engagement and Social Value generation	Include opportunities and Social Value in Desk Based Assessments. Audience research and Community-identified Social Value objectives prioritised.		ADDING VALUE LOCALLY	Incorporate Social Value-led community programmes and objectives into the Written Scheme of Investigation and programme. Co-create, deliver and evaluate projects with a focus on maximising positive impact			Provide engaging, accessible, meaningful, and exciting outputs for different audiences		