

Mill Hill Park Conservation Area Management Plan

September 2007



MILL HILL PARK CONSERVATION AREA MANAGEMENT PLAN

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1. Introduction

This plan sets out the local authority's approach to managing the future of Mill Hill Park CA. It is based on an appraisal of the character of the CA, the statutory planning policies affecting the area, the role of other local authority services in the area, and the requirements and aspirations of local people – both residents and businesses.

It is very much a partnership document, 'owned' by all parties involved in producing it. This partnership approach means that the plan will be respected, and will be guided by the conduct of each partner.

2. Policy

This Management Plan indicates how the policies in the Local Development Framework (LDF), along with other matters, will figure in the on-going management of the Mill Hill Park CA. It is not a planning policy document itself however, and it does not form part of the Local Development Framework (LDF).

Ealing's Local Development Framework comprises a series of documents. The following documents have a bearing on the Conservation Management Plan:

- The 'unitary development plan' (UDP), also known as the Plan for the Environment, contains the statutory policies for development in the CA and elsewhere in the borough. Volume one of the UDP has policies for all types of development. There is a specific policy on conservation in Chapter Four on Design (policy 4.8). Volume two of the UDP shows sites and areas across the borough. Mill Hill Park CA is indicated in Table 10.12 and Map 8 in Volume Two. The UDP also has a "Proposals Map" which specifies the definitive boundary of the Mill Hill Park CA. It should also be noted that the UDP comprises the development plan for the borough along with the Mayor of London's London Plan. For most purposes, the London Plan policies are reflected in the UDP, and there are cross-references to them in the UDP.

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- The series of supplementary planning guidance and supplementary planning documents provide more detailed guidance on how the statutory policies should be applied. These cover topics, sites and areas.
- The Local Development Scheme sets out the programme of work on future planning policy. This includes reference to a Supplementary Planning Document on Conservation, which is currently being prepared, and which will be subject to formal consultation in the Spring of 2007. In May of 2007, the Council's preferred options for the planning of the borough will be published.
- The Statement of Community Involvement sets out the Council's commitments to community involvement in all aspects of town planning, including matters pertaining to the Mill Hill Park CA.
- There are also other documents providing background information and monitoring data in the LDF. All published information on the Local Development Framework is on the Council's web site at www.ealing.gov.uk/planpol

3. Conservation Area designation

Mill Hill Park CA is one of 29 (twenty-nine) of L.B. Ealing's CAs (CAs) and it is managed, like the others, by the legal regulations of the *Planning (Listed Buildings and Conservation Areas) Act, 1990*. The Council operates its responsibilities under the Act to "preserve and enhance" the character of the CA. The Council will also undertake regular reviews of the area to monitor the quality of development and the effectiveness of its policies and guidance.

3.1. Character appraisals

The Council has completed a Character Appraisal for Mill Hill Park CA, of which this Management Plan is a further part. The appraisal has been produced to describe and evaluate the special architectural and historic interest of the CA. The statement of character will provide a basis from which to evolve not only the making of development control decisions, but also for the informed framing of design guidance. The appraisal is the basis for the direction of this Management Plan, identifying the elements of special interest of Mill Hill Park CA that require attention or improvement. The appraisal also provides a valuable resource upon which to defend Appeals against refusal of planning permission.

3.2. Archives and the importance of the past

The CA contains a good deal of historic fabric and evidence of this has been included in the Appraisal to demonstrate the evolution of the area over the past 250 years or so.

The Appraisal deals especially with the period from the 18th century to the present day. In the late 19th century house construction intensified thanks to the work of the London developer William Willett and Mill Hill Park changed from a rural area into a suburban settlement. Archival material, taken from historic material provided by Ealing Local History Centre and Mill Hill Park Resident's Association has been included in the Appraisal to provide a sense of historical depth and to illustrate Mill Hill Park's development. Elements of this past may still be felt and understood, thus posing questions about protection and enhancement of the CA.

4. Development control

As a result of the demand for development, the character of the CA is under constant threat posed by unsympathetic, poorly designed and executed new buildings, extensions and alterations. The situation therefore highlights the role of development control in managing the future changes to the CA.

4.1. Principles for development control

Mill Hill Park and its immediate surroundings are under strong development pressure. Sensitive and responsive management is required in order to cope with this pressure and the following principles will be adopted to guide the Council in its control of development:

- 1) The Council will apply the principles, guidance and regulations outlined in the *Planning (Listed Buildings and Conservation Areas) Act 1990* and the broader guidance of *Planning Policy Guidance Note 15 (PPG15)* and any subsequent revisions or additions.
- 2) The Council will apply the policies outlined in its *Plan for the Environment, the Unitary Development Plan (UDP)* as adopted in October 2004, until such time as these policies are replaced by policies in the emerging *Local Development Framework*.
- 3) The Council will require all planning applications to be supported by a Design and Access Statement and PPG 15 Justification Statement where appropriate. The Design and Access Statement should be a brief but thorough guide to the reasons for the development and how the design fulfils, together with a statement concerning any access issues that may exist. Officers of the Council can provide assistance to applicants with more information and with examples on file of successful Design and Access Statement or PPG 15 statements.
- 4) A major requirement for any development proposal in a CA is quality, covering the design, materials, workmanship and execution.
- 5) The Council will not dictate on the choice of architectural styles of any proposed new buildings, extensions or alterations but the position may be simply put as follows:

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- Contemporary and Modernist styles are entirely acceptable if they are high in quality and provided that they remain sympathetic in the context and towards the host building and/or other neighbouring buildings

OR

- Replicas of good, older buildings may be preferred provided that they are properly researched and high in quality. The design, scale, massing and detailing of such Traditionalist schemes should accurately replicate the contextual, local materials.
- 6) The drawings through which proposals are submitted should clearly and competently demonstrate the intentions of the development, preferably being accompanied by photographs and anything else that can demonstrate the project's aims.
 - 7) The Council will make use of technically experienced and qualified Officers in guiding the assessment and determination of all applications received.
 - 8) Applications for work in CAs must be accompanied by clear indications of the materials to be used in producing the external finish and architectural details of the proposed buildings. Actual samples of the materials should be submitted as part of the preparations of the scheme and/or in the course of beginning on-site building operations.
 - 9) Where possible, the Council recommends pre-application consultation. Planning Services and applicants may thus work jointly to produce schemes that are successful and high in quality. Experience has demonstrated that advance work of this sort is the most effective and efficient way of preparing applications.

5. Preservation and enhancement

5.1. *Understanding the asset*

The Character Appraisal of which this Management Plan forms a part is central to understanding Mill Hill Park CA and its future needs. As a result of the appraisal process, the aspects of the area that are under the most threat have been identified. The threats include the removal of boundary walls, hedges or fences; the replacement of boundaries by unsympathetic gates and brick and metal enclosures; unsuitable and out-of-scale extensions including dormer windows and garish front porches; the conversion of green-space front or side gardens to hard-standings; unsuitable window and door replacements or other features that affect the parts of houses fronting a highway.

Bulky extensions to the side and rear of properties erode the traditional spatial relationship between buildings in the CA. Additions to this list are buildings of poor design and/or poor presentation. Negative contributions to the setting of Mill Hill Park CA are also made by undistinguished development neighbouring the CA, empty sites producing unsightly gaps, and the incremental loss of spaciousness and openness due to relentless development demands.

5.2. *Maintaining quality*

The Council's attention to quality in Mill Hill Park CA will be maintained through its contribution to the following elements of development and alteration.

1) Quality of applications

In line with PPG15 the Council will not accept outline applications for proposals in CAs. Full applications will be required to be supported by properly drafted, accurate, scale drawings with plans, sections and elevations. In many cases for large schemes the Council will also expect analytical drawings, showing proposals in context, either through streetscape sections or three-dimensional images.

2) Quality of materials

The Council will, where possible, require that materials proposed are submitted as part of an application and not as a Condition.

3) Details

Where appropriate to aid in the assessment of an application, the Council may require the submission of large-scale construction detail drawings. This enables officers to check the quality of what is proposed and ensure that on site design is not left to the builder.

4) Experienced persons

The Council will always advise that applicants appoint both consultants and builders who have experience in historic building work.

5) Windows and doors

The Council has a well-founded preference for traditional, renewable materials and will therefore exercise its powers to advise and to insist, in cases where appropriate, against the use of architectural elements and fenestration details in PVC-U or other manufactured substitutes.

Plastic window frames and doors are not felt to be able to replicate the quality and appearance of original timber windows in CAs. Materials such as PVC-U are non-renewable and contribute to pollution. When used elsewhere on buildings, such as porches, barge-boards and conservatories it can have a negative effect upon visual appearance that should not be permitted in CAs. Depending on the individual circumstances, aluminium may not be considered an acceptable replacement for steel in window frames.

Generally, the Council believes that it is the attention to detail and the specific concern about quality at all levels that will help to preserve or enhance the character and appearance of Mill Hill Park CA.

5.3. *Preserve or enhance*

As outlined in Planning Policy Guidance Note 15 (PPG15) proposals for work within the historic environment and, in particular, within CAs must, as a minimum, preserve the character of the CA. The Council supports this standard as a basic requirement but will always encourage applicants and their agents to develop schemes that will actively enhance the character of the CA. In meeting these fundamental requirements the Council will require that proposals are demonstrably a faithful replication of the local historical precedent or a high quality contemporary building as described above.

5.4. *Elements at risk*

As previously described, the quality of any CA can be damaged to a significant degree by the loss of historic details whether 20th century in origin or earlier and the nature of this threat has led to the CA designation of Mill Hill Park and other parts of the Borough. The Council regards it as important to preserve certain details for the sake of the contribution they make to local architectural character.

Therefore, the protection of the following elements of the historic environment in Mill Hill Park CA will be of high priority:

1) Alterations and extensions to roofs and their covering materials.

The roofscape is an important element of the character of the CA. Any works whether for new buildings, extensions, alterations or the replacement of existing roof coverings, require planning permission to ensure that special care and attention is paid to the scale, the massing, the design and the materials employed.

- **Dormer windows**

Inset dormer windows will usually be accepted on the rear roof slopes but only rarely on the front or the side. They should not dominate the roof slope.

Dormer windows should be of traditional design. A roof shape in keeping with the original profile is preferred but a flat roofed dormer may be necessary in smaller or shallower roofs, to allow 500mm to the ridge, valleys and hips. All dormer windows should be finished with moulded eaves, cornices and timber fascias.

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Where possible the window(s) of the dormer should align with the windows of the main house.

There should be no tiling on the front elevation

- **Roof extensions**

Roof extensions should be built within the existing roof slope: they should not be wrapped around two roof slopes, exceed the height of the ridge, or form a continuation of the wall below. Changing a hipped roof to a gable should be avoided.

The ridge of the roof should not be raised to accommodate greater headroom: this will change the proportion of the house and may spoil the character and uniformity of the street scene.

- **Rooflights**

Rooflights will usually be acceptable on the rear roof slopes and on occasion on the sides. Any roof light should be “conservation roof light” which lie flat in the roof.

- **Tiles**

Tiles /slates should match the original in type, material and colour. Interlocking tiles are rarely appropriate.

- **Chimneys**

Chimneys are a particularly important element of the character of the Borough’s Conservation Areas and the Management Plan for Mill Hill Park CA incorporates clear preferences for the retention of existing chimneys where they contribute positively to local character and for ensuring that new proposals that include chimneys are high in quality of design, materials and execution.

2) Window frames and doors

Guidance will be given as part of the Mill Hill Park Management Plan for the retention of existing traditional windows and doors and will be specifically concerned to avoid and to advise against pollutants and non-renewable materials as replacements.

3) Brickwork

The management of brickwork and the pointing of walls is a critical issue in preserving detail in Mill Hill Park CA. Traditional finishes such as tuck-pointing should be

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respected and considered before works are carried out to buildings.

4) Front and side plots

Due to their impact on the visual amenity of Mill Hill Park CA, front and side plots are regarded as important for the preservation of the CA. The Council will ensure that the removal of existing traditional boundaries and gardens will be resisted and that proposals to replace or develop boundaries or front or side gardens will be appropriate in their materials and of high quality design that is compatible with the historic character of the CA. This is also consistent with Table 5H of the UDP, which encourages against the creation of hardstandings.

The removal of mature trees, unless dead, should not be permitted in order to create hardstandings.

5) Open spaces

The present condition of Mill Hill Park's principal open spaces, Mill Hill Gardens, could profit from better up keeping. The Council regards it as important to improve this situation and provide quality open public spaces across the Borough.

6) Extensions

The proliferation of unsightly and over-scale rear, side or roof extensions to dwelling houses are all regarded as detrimental to the historic environment of Mill Hill Park CA. For this reason, applications for extensions of this sort will be carefully considered and, where necessary for the preservation of local character, will be resisted.

In a CA it is highly desirable that buildings constructed separately retain their separateness rather than morph together in an unsightly jumble. Single storey rear extensions should not extend further back than 2 meters from the original building or further than either of the extended rear walls of the neighbouring houses.

7) Outbuildings

Garden buildings should be small-scale and sited discretely, taking care not to locate them too near trees. They should be for ancillary garden use and comprise a single, modest-sized room. Timber is the most appropriate material to ensure that they blend with the landscape.

8) Urban density

The generous plots in which houses are sited within Mill Hill Park Estate is considered to be one of the outstanding characteristics of the CA and all aspects of this openness will be protected.

All forms of over-development will be resisted; existing open spaces and gardens will preferably be maintained and their improvement will be sought. The future of existing gap-sites in Mill Hill Park CA will be given the most careful consideration in determining planning applications.

9) Shop fronts and signage

The Mill Hill Park CA does not include commercial use.

10) Traffic

Excessive volumes of traffic along Gunnersbury Lane and associated problems of speeding are detrimental to the setting of Mill Hill Park CA. Measures to address these problems will be sought and will be incorporated as the Management Plan develops. Existing traffic management measures will also be reconsidered.

11) Satellite Dishes and Telecommunication Installations.

Satellite dishes are a common problem in many CAs. They disfigure the fronts of historic buildings and also cause a loss of historic character when fixed in inappropriate locations. In Mill Hill Park CA satellite dishes are regarded by the Council as not being in character and therefore will only be acceptable when they cannot be easily seen from the streets or other public parts of the area. Telecommunication installations could potentially harm the historic character of Mill Hill Park.

12) Public Realm

The character appraisal for Mill Hill Park CA has identified that there are a number of improvements that could be made to improve the quality and coherent appearance of the public realm:

- Street signs;
- Landscaping improvements;
- Public seating;
- Street paving;

13) Trees.

The mature street trees in the CA provide an important part of Mill Hill Park CA special character. Their maintenance and any necessary replacement works are to be approached with sensitivity to this special character.

5.5. Monitoring and Review

The Council will review its CA Appraisals as part of a five-year programme of regular review and monitoring in compliance with policy reflecting the obligations imposed by the Planning (Listed Buildings and CAs) Act 1990.

5.6. Conservation Strategy and Practice

Ealing Council is in the process of reviewing its 29 designated CAs, some of which have in place Article 4 Directions (A4D) where these are appropriate. A4D means that some of the usual Permitted Development Rights of individual property owners (under the General Permitted Development Order, 1995) are withdrawn. Therefore, further significant changes or developments that would affect the special character of a certain CA would require planning permission. Although Mill Hill Park is not currently being proposed for widespread A4D measures, the Council will consider if it is appropriate to propose the application of A4D in parts of the CA.

To maintain all aspects of the “special character and appearance” of the 29 CAs, the Council will need to retain technical advisors specializing in the preservation and conservation of historic buildings, landscapes etc. A regular five-year cycle of study and review will need to be maintained to assess and monitor the CAs with the aim of the preservation of the areas in the long term. Overall, Mill Hill Park must be protected: firstly for its residents but also for the many non-residents who pass through this remarkable urban oasis on a daily basis.

5.7. A4D Considerations for Mill Hill Park CA

The CA appraisal of Mill Hill Park CA has shown the ongoing deterioration of the special character of the area due to a number of threats that include:

- building extensions disrupting the continuity of the streetscape
- bulky dormers windows disrupting the roofscape

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- loss of traditional fenestration patterns together with later doorways that offer material, design and decoration patterns which are not in keeping with the character of the CA
- loss of front garden trees and fences together with loss of garden walls to create parking for cars. Also, the insertion of tall railings and superfluous large brick gate piers
- clutter around buildings associated with the subdivision of large houses into flats: gas meters, waste bins, letterboxes and doorbells/ intercoms, satellite dishes.

The adoption of an Article 4(2) direction could result in the requirement for planning permission to be obtained for all extensions, porches, vehicle access and hardstandings, changes to wall surfaces and roof tiles, removal of chimney stacks and window replacements. Such controls would ensure a greater ability to manage changes to these elements that contribute to the character and if eroded will constitute a threat for the significance of the CA and for its setting. For this reason the Council will consider the application of A4(2) directions to parts of the CA. Any proposal would, of course, be subject to public consultation.

6. Consultation

The strength of Mill Hill Park CA Appraisal and Management Plan relies on the knowledge and commitment of residents and other key stakeholders. Both documents have been produced in partnership with members of Mill Hill Park Area Residents' Association and other interest groups across the wider Borough of Ealing community who have provided the authors of this work with the expert views and knowledge to help to positively shape the future of the CA. Wider views will be sought in the lead up to adoption of both the Appraisal and Management Plan, and thereafter in every five-year period of review.

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