



Appeal Decision

Hearing held on 20 January 2026

Site visit made on 21 January 2026

by F Cullen BA(Hons) MSc DipTP MRTPI IHBC

an Inspector appointed by the Secretary of State

Decision date: 19 May 2026

Appeal Ref: APP/A5270/W/25/3372230

21 Oldfield Lane South, Greenford UB6 9LQ

- The appeal is made under section 78 of the Town and Country Planning Act 1990 (as amended) against a refusal to grant planning permission.
 - The appeal is made by Mackenzie (South West) Homes Ltd against the decision of the Council of the London Borough of Ealing.
 - The application Ref is 223478FUL.
 - The development proposed is construction of two buildings, ranging in height from part 4 storeys to 6 storeys, to provide 36 residential units (Use Class C3), with disabled parking, cycle storage, resident amenity space and associated works (Following Demolition of existing Building).
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Decision

1. The appeal is dismissed.

Preliminary Matters

2. The description in the heading above is different to that in the application form¹ due to the scheme being revised during the determination of the application. This description is agreed by the parties. I have determined the appeal on this basis.
3. The Council is in the process of preparing a new local plan, the Ealing Draft Local Plan (Reg 22, 2024) (the Emerging Local Plan). Relevant to the proposed scheme is Site Allocation, Greenford – 01GR (SA 01GR)². The parties agree that SA 01GR should be given considerable weight. Given the Emerging Local Plan's advanced stage of preparation, and that there are no unresolved objections to SA 01GR, meaning it is likely to be formally adopted as part of the development plan in its current form³, I have no reason to disagree and attach considerable weight to this site allocation.
4. An updated Built Heritage Written Representation was submitted by the appellant as part of their Statement of Case⁴. Having regard to procedural guidance⁵ and settled caselaw⁶, the document does not amend the scheme, nor introduce any new issues for consideration. In addition, all parties have had the opportunity to comment on its contents as part of the appeal and hearing process. Given the

¹ The Demolition of existing building and construction of 51 residential units within two buildings of 5 and 9 stories, with disabled parking, cycle storage, resident amenity space and associated works.

² Greenford - 01GR: Greenford Hall, Methodist Church, former Police Station, former Clinic & Greenford Library.

³ With reference to Paragraph 49 of the National Planning Policy Framework.

⁴ Appendix A, Built Heritage Written Representation, by RPS. This updated the Built Heritage Statement by RPS, dated July 2022 which accompanied the original proposal.

⁵ Procedural Guide: Planning appeals – England. For appeals relating to applications dated on or before 31 March 2026, last updated 18 May 2026.

⁶ *Holborn Studios Ltd v The Council of the London Borough of Hackney* (2018), which refined the 'Wheatcroft principles' set out in *Bernard Wheatcroft v Secretary of State for the Environment* (1982).

above, and as confirmed at the hearing, I exceptionally accept it and have taken it into account in the determination of the appeal.

5. A 'Planning Obligation by way of Unilateral Undertaking under Section 106 of the Town & Country Planning Act 1990' (UU), not signed, dated or with a plan, was agreed by the parties and submitted as part of the appeal prior to the hearing⁷. The detail of the UU was discussed at the hearing. A copy of the UU was then signed, dated and a plan attached to it by the appellant⁸.
6. I am satisfied that the requirement for contributions is in line with the guidance as set out in the Council's Supplementary Planning Document 9: Legal Agreements, Planning Obligations & Planning Gain (Draft July 2007), and that the UU meets the provisions of the Community Infrastructure Levy Regulations 2010 and the tests in the National Planning Policy Framework (the Framework)⁹. Consequently, I have had regard to the UU and the agreed contributions in my determination of the appeal.
7. The Council's third reason for refusal cites perceived harmful effects of the scheme in respect of heritage assets, including a Grade II listed War Memorial and locally listed buildings/non-designated heritage assets (NDHAs). There are discrepancies between the Council's officer report and the reason for refusal in relation to the locally listed buildings cited as being affected by the proposal¹⁰. The Council confirmed at the hearing that the relevant NDHAs are, Greenford Police Station, 21 Oldfield Lane South; Greenford Library, 25 Oldfield Lane South; and Greenford Hall, Ruislip Road.
8. The loss of the Police Station as a NDHA is not included in the reason for refusal. However, I am mindful of the requirements of the Framework in respect of NDHAs¹¹. In addition, this matter has been addressed in the appellant's evidence and was discussed at the hearing. I am therefore satisfied that no prejudice would arise from me considering it as part of the determination of the appeal and have proceeded on this basis¹².
9. For the avoidance of doubt, the former Clinic is not a NDHA. At the hearing, the Council stated that the building's relevance is its contribution to the civic townscape of the area, rather than any heritage merit. I have therefore considered it on this basis.
10. At my site visit I was not able to see inside the Police Station due to health and safety reasons. I have been able to reach my decision on the evidence before me, including internal images and external views of the property.

Main Issues

11. The main issues are:

- Whether the proposed development would accord with the overall site allocation; and,

⁷ Submitted by email dated 7 January 2026.

⁸ A scanned copy was provided by the Council following the hearing in an email dated 22 January 2026.

⁹ Paragraph 58 of the National Planning Policy Framework.

¹⁰ In the reason for refusal The Council does not include Greenford Police Station, 21 Oldfield Lane South, but does include the Former Clinic (not a locally listed building). However, in the Officer Report the loss of Greenford Police Station, 21 Oldfield Lane South is highlighted, and does not reference any (heritage) effects on the former Clinic.

¹¹ Paragraph 216 of the National Planning Policy Framework.

¹² Including it as part of the second main issue.

- The effect of the proposed development on the character and appearance of the area, having regard to the significance of relevant heritage assets.

Reasons

Background

12. The appeal site (the site) is a rectangular shaped plot which measures circa 0.31 acres (0.13 hectares). It is located on the western side of Oldfield Lane South within Greenford District Centre. It is highly accessible in respect of services and facilities and well connected in terms of public transport¹³.
13. The site includes the vacant former Greenford Police Station at the front, and open space and hardstanding at the rear. It is bound to the front by a low brick wall and to the rear by tall, close-boarded, timber fencing. Immediately adjacent are the former Clinic and Greenford Library (now vacant); other properties in retail and residential uses; and the large public open space of Ravenor Park. To the south lies, what can reasonably be described as, the heart of Greenford District Centre along The Broadway, encompassing a more varied townscape of buildings in civic (including Greenford Hall and the Methodist Church), retail, commercial and residential uses, as well as the Grade II listed Greenford War Memorial. To the north is largely semi-detached suburban housing.
14. The scheme comprises the demolition of the Police Station and the construction of a four storey villa building with a hipped roof at the front of the site facing Oldfield Lane South (the Villa building); and a six storey building at the rear of the site overlooking Ravenor Park (the Parkside building).
15. The scheme was amended during the determination of the application, which has included a reduction in the number of units proposed from 51 to 42 and then to 36, the latter being the subject of the appeal. The units would provide a mix of one, two and three bedroom homes, three of which would be wheelchair accessible. Also proposed is associated landscaping and amenity areas, and refuse and cycle storage. The materials would be mainly facing brick in a range of red colours.

Overall site allocation

16. The site forms approximately a sixth of the land which is included in SA 01GR. It is located fairly centrally within the allocation and also includes Greenford Hall, the Methodist Church, the former Clinic and Greenford Library. SA 01GR sets out the contextual considerations and design principles for the allocation. It confirms that 'the site holds significant opportunity for a high-quality mixed-use scheme that sets an example for development in Greenford town centre by providing significantly improved public facilities within a unique setting of historic buildings and Ravenor Park.'
17. The supporting text to the site allocation confirms the 'proposed uses' of residential, leisure, community, health and place of worship. The proposed development would provide solely residential use, which the Council asserts would not be in keeping with the overall site allocation which seeks to have a mix of uses. Whilst, of itself, the proposal would not include a 'mix' of the uses set out in the site allocation, it is not specified in SA 01GR where, or in what combination, these uses are anticipated to be located within the site allocation as a whole.

¹³ The site has PTAL rating of 4.

18. Moreover, given the existing and former uses of buildings within the site allocation and their ownership, it is reasonable to conclude that the other uses envisaged could be provided on other plots within the site allocation without prejudicing the delivery of a 'mixed-use scheme'. I therefore find no direct conflict with the site allocation in this specific respect.
19. The supporting text also advises that the site allocation area is 'in principle suitable for a tall building', of a 'maximum height of 6 storeys (21m).' At the hearing the appellant confirmed that the tallest of the two buildings (the Parkside building) would be under the maximum envisaged (being 6 storeys, 20.8m), and therefore not a 'tall building'¹⁴. This is not challenged by the Council. On this particular basis, I also find no direct conflict with the site allocation.
20. However, crucially in terms of the overall site allocation, the proposed development relates to only one part of it and is not part of a 'heritage-led masterplan approach' as envisioned for SA 01GR. The Council confirmed at the hearing that a masterplan for the site allocation is not being progressed at present with any appointed consultants.
21. In this regard, I note the appellant's written and oral submissions that they have proactively engaged with the Council and neighbouring owners to ensure that other sites within SA 01GR can be brought forward mutually. I also note the work undertaken by the appellant in assessing future redevelopment scenarios and formulating an indicative masterplan for the allocation, which they submit illustrates that the proposed development would not prejudice the aspirations of SA 01GR¹⁵, with it being 'a first phase' and potential 'catalyst' for the wider delivery of development on adjacent plots.
22. Nonetheless, the formulated 'masterplan' is merely indicative and does not have the formal agreement and support of any relevant stakeholders. As such, I am not persuaded that the scheme would be a satisfactory starting point and/or stimulus to further development within the site allocation. Additionally, no substantive evidence is before me which confirms that, as sought by the design principles, the preparation of the scheme or the indicative masterplan has been 'heritage-led'.
23. The appellant has not satisfactorily demonstrated that a piecemeal approach to development within the site allocation which is not part of an agreed masterplan, such as that proposed, would still allow the wider aspirations of SA 01GR to be achieved, and ensure 'uses, buildings and spaces are repurposed or redeveloped and integrated into the town centre in a cohesive and sensitive manner'¹⁶. In reaching this conclusion, I have had regard to the comments of the Design Review Panel (DRP), in that the scheme would benefit from coordination with other sites as part of a holistically considered masterplan¹⁷.
24. In addition, whilst a building of up to 6 storeys (21 metres) within the site allocation is acceptable in principle, this is a 'maximum' and its positioning also needs to have regard to the other design principles of SA 01GR. In this respect, it would include locating residential development next to Ravenor Park to improve amenity and outlook. However, given that the Parkside building would be just 200mm under the

¹⁴ As defined in Policy D9: Tall Buildings London Plan – Ealing LPA – local variation of the Emerging Local Plan.

¹⁵ Section 4 Oldfield Lane South, Greenford Townscape and Visual Appraisal August 2022, GL Hearn; and Section 2 Oldfield Lane South, Greenford Townscape and Visual Appraisal June 2023, GL Hearn.

¹⁶ Design Principles SA 01GR.

¹⁷ Ealing Design Review Panel Comments, Dated March 2023, for scheme including 42 units.

height of a 'tall building' and that, in conjunction with the Villa building would be a comprehensive redevelopment of the site as a whole, it could not reasonably be described as being mid-rise' and/or mid-density. Moreover, I note that the design principles advise that taller elements should be situated along the street frontage of Oldfield Lane South and The Broadway, which this proposal would also not achieve.

25. In relation to other relevant design principles, whilst the scheme would provide connectivity to Ravenor Park, for security reasons, this would be for the private use of occupiers of the development and would not be publicly accessible.
26. I acknowledge that the site is located within an area with an 'emerging context'. However, as set out below, I am not convinced that the proposal would be a high-quality scheme that 'sets an example for development in Greenford town centre'.
27. The design principles do not require the retention of the Police Station as a NDHA. Although this was considered by the appellant, it was found to be neither practical nor viable¹⁸. This is not challenged by the Council, and I have no reason to dispute the reports' conclusions. Nevertheless, it remains that it would result in the loss of a NDHA and associated loss of its significance. This is considered further below.
28. To conclude on this issue, for the reasons set out above, I find that the proposed development would not accord with the overall site allocation, SA 01GR of the Emerging Local Plan. Additionally, it would conflict with Policy 7B of the Ealing Development Management Development Plan Document, 2013 (the Ealing DM DPD) which, amongst other things, requires new development to achieve a high standard of design amenity for users, including the coherent development of sites and appropriate levels of development on sites. It would also not comply with Policies GG2 and D3 of the London Plan, 2021 (the London Plan), in so far as they seek to make the best use of land and optimise the capacity of sites through a design-led approach. It would also conflict with Paragraphs 131, 135 and 139 of the Framework which seek to achieve well-designed places.
29. Policy 7A of the Ealing DM DPD is cited in the Council's reason for refusal relating to this issue. However, Policy 7A concerns 'Amenity', primarily with reference to emissions. The Council has raised no concerns regarding the scheme's impact on the amenity of surrounding residents or that of potential occupiers of the development. This policy is therefore not determinative in this instance.

The effect of the proposed development on the character and appearance of the area, having regard to the significance of relevant heritage assets

Character and appearance

30. The Ealing Character Study A2 Report¹⁹ provides a high level assessment of Greenford. It confirms that the District is characterised by a prevailing suburban character, mainly comprising the typologies of 'Suburban semi-detached' and 'Suburban terraces'. Greenford Town Centre is identified as a historic settlement which has expanded over the years. Under this classification, the site is

¹⁸ See Financial Viability Review by Gerald Eve LLP (February 2024) and Financial Viability Assessment by Redloft (July 2023).

¹⁹ Ealing Character Study A2 Report-Typologies and Scope for Growth, Allies and Morrison Urban Practitioners Solidspace Jan 2022, p104.

categorised as being within the 'Town centre' typology and adjacent to the 'Open space, Park' typology and 'Suburban semi-detached' typology²⁰.

31. The land within the site allocation SA 01GR is described as being slightly set back from the bustling shopping area of The Broadway and along Oldfield Lane South within an area characterised by a range of building forms and scales, predominantly low rise red brick; with the surrounding streets having wide pavements which are lined with mature trees and semi-detached houses. Additionally, the agreed Statement of Common Ground confirms that the site, and the Police Station, is in a historic civic cluster of buildings. This includes the former Clinic, the Library, the Hall and the Methodist Church.
32. The built form within and around the site exemplify these identified typologies and characteristics. To the south is the commercial heart of the District Centre along The Broadway which incorporates a varied mix of buildings of different sizes, scales, designs and materials, albeit predominantly red brick. The majority are 2-4 storeys, but some are up to 5-6 storeys. Immediately to the north is the low rise, red brick, former Clinic and Library, with beyond that being largely 20th century suburban residential development of 2-3 storeys. To the east is the large open public space of Ravenor Park.
33. The loss of the Police Station as a NDHA is considered below. In terms of general character and appearance, its removal would weaken the built civic presence on Oldfield Lane South. This was highlighted by the DRP in their comments.
34. Additionally, by virtue of its greater height, size, scale and massing in comparison to the existing Police Station and immediately adjacent buildings, the Villa building fronting Oldfield Lane South would appear unduly prominent within the townscape and out of keeping with the generally low rise built context on that side of the street. It would maintain the existing set back building line of the Police Station. However, I am not convinced that, as advanced by the appellant, this would 'soften the transition between the new development and the existing streetscape', particularly as the Villa building would sit noticeably forward of the building line of the former Clinic and Library to the north.
35. As set out above, it is common ground between the parties that the Parkside building would not be a 'tall building'. However, it would still be considerably taller than any building in the immediate locality. I recognise that the eastern edge of Ravenor Park has a different character in that it forms the edge of the District Centre. However, it remains that the buildings adjacent to this boundary are low density and low rise, and such a conspicuous increase in height of built form would result in it dominating the skyline when viewed from adjacent public routes and spaces, particularly Ravenor Park. Even though SA 01GR allows for mid-rise' and/or mid-density residential development adjacent to the Park, the proposed development could not reasonably be described as such.
36. The buildings would have moderately sized footprints relative to other buildings in the area, and I note the stepped form of the Parkside building to break up its mass. Even so, they would still be substantial structures within a fairly narrow plot, being positioned tight up against its boundaries, particularly to the south.

²⁰ Figure 4 Oldfield Lane South, Greenford Townscape and Visual Appraisal June 2023, GL Hearn.

37. Taken together, these factors would cause the scheme to be an overdevelopment of the site, which would disrupt the spatial hierarchy of the buildings and spaces which currently form the District Centre's distinctive townscape on this side of Oldfield Lane South.
38. The use of brick in a variety of tones and patterns on the elevations of both buildings would be consistent with the predominant materials in the area, reflect some of the design embellishments found in the locale, and provide some articulation and visual relief to the facades. Even so, from the plans provided, the buildings would read as large utilitarian blocks with quite flat monotonous fenestration. This characterless appearance would be even more pronounced on the blank southern facades, proposed to prevent prejudicing adjacent sites from coming forward. Given the fundamental need for high-quality design and materials in this context, I am not satisfied that it would be reasonable to seek to resolve this matter through the submission of further details secured by condition.
39. The incorporation of a hipped roof on the Villa building would echo the roofscape of adjacent properties. However, I am not convinced that its steep pitched form with what appears to be a box extension at the rear and a faux chimney stack to the side, sits comfortably on this four storey 'contemporary' Villa building.
40. Having regard to the appellant's Townscape and Visual Appraisal²¹ (TVA), the Council's comments and my observations on site, I am in general agreement that the scheme and its effects on the character and appearance of the area, including heritage assets as set out below, would be perceptible and keenly felt in the following character areas and viewpoints where the 'Magnitude of Effect' is concluded to be 'Large' or 'Medium': The site and surrounding area; Townscape Character Area 5 Greenford Town Centre (TCA5); and Viewpoints 2 View from Stanhope Park Road (VP2) and 5 View from the south east of Ravenor Park (VP5).
41. I acknowledge that the site and its immediate surroundings benefit from some screening due to intervening built form and mature street and parkland trees, and I note the additional landscaping proposed as part of the scheme. Additionally, as referred to earlier, the inclusion of the site within SA 01GR, means that it forms part of an 'emerging context' where additional development is acceptable in principle subject to contextual considerations and design principles, and I note the appellant's reference to other schemes in the centre of Greenford²².
42. Even so, I am not persuaded that, as concluded by the TVA, the 'Nature of Effect' in relation to the site and surrounding area, TCA5, VP2 and VP5 would be 'Neutral'. The harmful effects I have identified above would not be satisfactorily mitigated by the existing or proposed vegetative screening, particularly in the autumn and winter months when leaf cover would be reduced. Additionally, with no formal masterplan in place, it cannot be guaranteed that it would bring forward built form of a 'similar size and mass to the proposed development'²³. As such, it has not been demonstrated that the scheme would sit neatly or comfortably assimilate within the site, the site allocation and/or the District Centre as a whole. Moreover, of the other developments cited, their position within the District Centre, topographical context and/or immediate surroundings in terms of built form, designations and uses are not directly comparable to those before me, and do not justify allowing the appeal.

²¹ Table 5 – Appraisal Results Summary, Oldfield Lane South, Greenford Townscape and Visual Appraisal June 2023, GL Hearn.

²² Lidl and MacMillan Court; Central West Building; Red Lion Court; and Cardinal Wiseman Catholic School.

²³ Paragraph 9.4.2 Oldfield Lane South, Greenford Townscape and Visual Appraisal June 2023, by GL Hearn.

43. I recognise the positive amendments that have been made to the scheme from its initial submission. I also concur with the appellant that change and visibility, particularly within an urban context such as this, do not automatically equate to harm. However, the Framework is clear that 'Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities'²⁴. For all of the reasons set out above, and below in relation to relevant heritage assets, it has not been adequately demonstrated that the proposed development would add to the overall quality of the area, not just for the short term but over the lifetime of the development and would be sympathetic to local character and history, including the surrounding built environment and landscape setting²⁵.
44. Drawing all of the above together, I find that the proposed development would have a harmful effect on the character and appearance of the area. As such, it would be contrary to Policy 7B of the Ealing DM DPD in so far as it requires new development to achieve a high standard of design amenity. It would also conflict with Policy D3 of the London Plan, in so far as it concerns optimising the capacity of sites through a design-led approach. There would also be a lack of compliance with Paragraphs 131, 135 and 139 of the Framework which seek to achieve well-designed places.
45. Policies 3.5 and 7A of the Ealing DM DPD and Policy D2 of the London Plan are cited in the Council's reason for refusal relating to this aspect of the proposal. Policy 3.5 relates to the quality and design of housing developments, primarily with reference to space standards, Policy 7A relates to 'Amenity' primarily with reference to emissions, and Policy D2 relates to infrastructure requirements for sustainable densities.
46. The Council has raised no concerns regarding space standards within the proposed development, or its impact on the amenity of surrounding residents or that of potential occupiers of the scheme. Additionally, it is not clear which part of Policy D2 the proposal conflicts with in relation to this issue. These policies are therefore not determinative in this instance.

Relevant heritage assets

47. The site is proximate to the Grade II listed building, Greenford War Memorial²⁶. Within the site is the NDHA of the Police Station²⁷ and located nearby are the NDHAs of Greenford Library and Greenford Hall²⁸. SA 01GR confirms that these NDHAs make a positive contribution to the area. I agree.

War Memorial

48. The listed War Memorial is a First World War memorial cross on a shaft which is set on a three-stepped base. Formed from Portland stone, it was designed by A. J. Campbell-Cooper and unveiled on 12 June 1921. It occupies a prominent site on a green enclosed by an ornamental fence, at the junction of The Broadway, Ruislip Road and Oldfield Lane South.

²⁴ Paragraph 131 of the National Planning Policy Framework.

²⁵ Paragraph 135 of the National Planning Policy Framework.

²⁶ Greenford War Memorial, National Heritage List for England, List Entry Number: 1441331.

²⁷ Greenford Police Station, 21 Oldfield Lane South, Local Heritage Register Ref: LLR0997.

²⁸ Greenford Library, 25 Oldfield Lane South, Local Heritage Register Ref: LLR0998 and Greenford Hall, Ruislip Road, Local Heritage Register Ref: LLR1126.

49. I find the asset's special interest and significance to primarily derive from its historic and architectural interests, as a permanent testament to those who lost their lives in the First World War, and its 'elegant and striking' form. It is a compelling symbol of the collective experience borne by the local community, and of wider communal values.
50. Pertinent to the appeal, the War Memorial's special interest and significance also stem, in part, from its setting. The asset's immediate surroundings of the enclosed green and adjacent footpaths are the main spaces from which the asset and its heritage merit are appreciated. The green space in particular allows formal contemplation and commemoration of the lives lost and contributes considerably to its significance.
51. Beyond this, the wider surrounds of the War Memorial comprise busy vehicular routes and the built backdrop of Greenford District Centre, which includes the appeal site. Whilst the War Memorial, and what it represents, can still be experienced within this wider setting, this is to a much lesser extent. Moreover, in relation to the site, the evidence does not indicate that there are any historical or functional links between it and the War Memorial, and there is limited intervisibility between the two. As such, the site, as part of the War Memorial's wider setting, makes a neutral contribution to the asset's special interest and significance.
52. The scheme would not affect the War Memorial's fabric, symbolism, or immediate setting, and thus the contribution these elements make to the asset's significance. It would result in change to the built backdrop which forms part of the asset's wider setting. However, this would not alter the authenticity of how the War Memorial is experienced or how its intrinsic heritage values are appreciated. On this basis, the proposed development would preserve the listed building's setting and would not harm its significance.

Police Station

53. There are inconsistencies in the evidence regarding the age and use of the appeal building as a Police Station. Whilst it is said to date from circa 1900, first appearing on the 1914 OS map referenced as 'Pol Sta', the local list description states it was not opened as a Police Station until 1949. This gives rise to doubt as to the building's original form and whether it was purpose built.
54. Designed by architect F. F. Curtis, it is constructed of red brick with clay hanging tiles and half timbering at first floor and a red clay tiled roof. It is no longer in use as a Police Station, stated to have been vacant for seven years. It has been altered externally and internally as part of its former use and is in a poor state of repair.
55. The asset's significance is mainly drawn from its local historic interest in its former function and status as part of the cherished local scene and collective experience of the local community. In terms of architectural interest, no evidence has been advanced that its form, design and/or materials are of any particular local rarity or importance. Even so, and notwithstanding its altered form and poor condition, it is a modestly attractive example of its type. To a much lesser degree, the asset's value as part of a group of civic buildings in the immediate locale, albeit of different ages and styles, also contributes to its significance. Additionally, some significance is derived from its immediate and wider settings, both of which provide context in which to understand the building's form and (former) communal function.

56. The retention and reuse of the Police Station has been assessed by the appellant and found to be neither practical nor viable, the findings of which I have no reason to dispute. I am also mindful that, as a vacant building, its civic function and status have already been lost. In addition, as advanced by the appellant, a historic building record could be taken of the asset prior to its demolition.
57. However, it remains that the scheme would result in the complete demolition of this NDHA and therefore total loss of its significance. I note the comments made by the DRP in this regard. Its loss would also give rise to some associated harm to the group value of the cluster of civic buildings in the area. Additionally, the Framework is clear that the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted. I therefore find that the direct effects of the scheme on the Police Station would result in a moderate level of harm.

Library

58. The Library is located on the western side of Oldfield Lane South, to the north of the site. Dating from the 1920's and opened in 1934, it is a grand building constructed of red brick with stone detailing, and a clay tiled hipped roof set behind a brick parapet. The asset's significance mainly stems from its local historic and architectural interests as a purpose built library of communal value, in an embellished polite architectural style. Significance also stems to a small degree from its value as part of the aforementioned group of civic buildings in the locale.
59. The building's well-defined immediate setting also makes a meaningful contribution to its heritage merit. Relevant to the appeal, although the evidence indicates that the 'civic' townscape on this side of Oldfield Lane South was not consciously designed, the generally more open and low rise wider surroundings of the asset, including the appeal site and Police Station, allow the Library and its communal value alongside other municipal buildings on this side of the street to be recognised and appreciated. In these respects, the asset's wider setting, including the appeal site, contributes positively to its significance.
60. The scheme would not affect the Library's fabric or immediate setting, and thus the contribution these elements make to the asset's significance. However, the loss of the Police Station would weaken the group value of the co-located civic buildings of which the Library forms part. Additionally, the introduction of such substantial development of the size, scale, massing and design proposed, in such close proximity to the Library, would fundamentally disrupt the largely low rise and open wider context within which the asset is experienced. It would weaken the Library's prominence and legibility within the townscape and adversely alter the ability to appreciate its significance as part of the cherished local scene. I therefore find that the indirect effects of the scheme on the Library would result in a low level of harm.

Hall

61. The Hall occupies a setback position on the northern side of Ruislip Road, to the south of the site. Dating from the 1960s, it is built in brick and white render with a flat roof hidden below a low parapet. It has recently been refurbished. The significance of the Hall mainly lies in its local historic and architectural interests, in terms of its municipal role within the local community, and as an example of 20th century civic architecture, with its front façade/entrance being of most note. Some significance is also drawn, in small part, from its value as part of the aforementioned group of civic buildings in the locale.

62. The fairly open and largely hard landscaped frontage of the Hall along with the adjacent public footpath and road, allow the building and its significance to be appreciated and positively support its heritage merit. The building's functional association with the community it serves means that its wider setting also contributes to its significance, but to a much lesser degree. This combined with the small group value between the Hall and Police station means that the site makes a small positive contribution to the significance of the Hall.
63. The scheme would not affect the fabric of the Hall, nor its immediate setting, and its civic presence on Ruislip Road would be maintained. Whilst there would be change within the wider context in which the Hall is experienced, I am satisfied that this would not materially affect the ability to appreciate its significance. Nonetheless, the loss of the Police Station would undermine the group value of the co-located civic buildings of which the Hall forms part. I therefore find that the indirect effects of the scheme on the Hall would result in a very low level of harm.
64. Drawing all of the above together, I find that the proposed development would collectively result in a moderate level of harm to the NDHAs of the Police Station, the Library and the Hall. As such, it would conflict with Policy 7C of the Ealing DM DPD and Policies HC1 and D3 of the London Plan in so far as they seek to conserve the significance of heritage assets. It would also not comply with Paragraph 210 of the Framework with reference to sustaining and enhancing the significance of heritage assets.
65. I find that the proposed development would preserve the setting and not harm the significance of the Grade II listed War Memorial. This would comply with the requirements of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended); the relevant provisions of the Framework concerning designated heritage assets; and the relevant policies of the Ealing DM DPD and London Plan as referred to above. Even so, a lack of harm in this regard is a neutral consideration and weighs neither for nor against the proposal.
66. Policy 3.5 of the Ealing DM DPD is cited in the Council's reason for refusal relating to this issue. Policy 3.5 relates to the quality and design of housing developments, primarily with reference to space standards. I therefore find that this policy is not determinative in relation to heritage matters.
67. In finding harm to the significance of a NDHA, the Framework requires a 'balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset'²⁹. This will be undertaken as part of the overall planning balance below.

Other Matters

68. The appellant has drawn my attention to three schemes in the Local Planning Authority area (Greenford Ward) where permission has been granted for large scale redevelopments, which include tall buildings and which are advanced as having a greater impact than the appeal proposal³⁰. I was able to briefly view the sites on my site visit.

²⁹ Paragraph 216 of the National Planning Policy Framework.

³⁰ Gurnell Redevelopment (March 2025); Greenford Park Service Station Redevelopment; and Smiths Farn Redevelopment.

69. The principle of consistency in decision making is an important one. That said, each decision turns on the facts and circumstances of that particular case at the time of the application.
70. I acknowledge that the schemes cited were considered against the same Development Plan Policy context, including Ealing Character Study; and are sited outside sustainable town centre locations, and on land with similar or additional contextual constraints, including Metropolitan Open Land, Public Open Space and near to NDHAs.
71. However, the characteristics, context and policy considerations of each site are different and not wholly comparable to those before me. Furthermore, I have not been presented with the full details of these other schemes and do not know the exact circumstances that led to these permissions being granted. This is with particular regard to the overall planning balance in weighing any identified harms against any perceived benefits.
72. Consequently, it does not follow that the appeal scheme should be granted. In any event, I have considered the appeal on its own merits and reached my own conclusions. Therefore, the schemes cited carry little weight in favour of the appeal.
73. Representations by interested parties at application and appeal stage raised other matters including strain on local infrastructure; parking and traffic congestion; noise, air pollution and environmental impact; crime, including loss of police presence; lack of affordability and social benefit; impact on green spaces and views; and overcrowding, including impact on quality of life. The Council either raised no concerns in relation to these matters or concluded that any effects could be addressed through the imposition of suitably worded conditions. I have no reason to take a different view, and so have not considered them further.

Planning Balance

74. The proposed development would provide 36 residential units of a mix of types and sizes, including private and communal amenity space, to the local housing supply in an accessible and well connected location. The Council is currently unable to demonstrate a five-year housing land supply, with its position stated as 3.9 years³¹. In this context, the proposal would make a meaningful contribution to the supply of housing in the area and help to address the current shortfall. It would also accord with the broader local objective to provide more housing, as well as the Government's aims to boost the housing supply and grow the economy. Taking into account the extent of the deficit and the 36 units of housing proposed, this carries significant weight in respect of overall housing delivery.
75. The scheme would not provide any on-site affordable housing. However, the submitted UU includes an off-site contribution, with the amount being agreed by the Council. This can therefore be considered a benefit of the scheme, to which I attach moderate weight.
76. There would be some short-term economic benefits during construction. Future occupiers would contribute to the local economy. There would also be some environmental benefits which would arise from the application of a 'very good specification for building fabric', and the use of on-site renewables, including Air

³¹ As confirmed by the Council following the hearing in an email dated 27 January 2026.

Source Heat Pumps and solar PV; and proposed soft landscaping, including two street trees, and associated ecological improvements and bio-diversity enhancement. Together, these benefits carry moderate weight.

77. The scheme could be said to make more effective and efficient use of brownfield/ previously developed land in meeting the need for homes and other uses. Paragraph 125 c) of the Framework requires substantial weight to be given to the value of using suitable brownfield land within settlements for homes and other identified needs, proposals for which should be approved unless substantial harm would be caused. However, the Framework is clear that the effective use of land should also safeguard and improve the environment, which I find the proposed development would not do and, as set out below, to which I have attached substantial weight. Consequently, this lessens the weight this matter carries in the scheme's favour to moderate.
78. The appellant submits that significant weight should be given to the benefit of the scheme in likely further stimulating the delivery of much needed housing in the Borough and being a catalyst in speeding up the delivery and aspirations of the site allocation. However, it has not been adequately demonstrated that this would be the case. Indeed, it is reasonable to conclude that the incremental and uncoordinated development of sites within SA 01GR would likely lead to the broader design principles of the site allocation not being fully realised. As such, this carries very little weight.
79. Conversely, the proposed development would not accord with the overall site allocation and would conflict with SA 01GR of the Emerging Local Plan, albeit not fully adopted but which the parties agree carries considerable weight; Policy 7B of the Ealing DM DPD; Policies GG2 and D3 of the London Plan; and Paragraphs 131, 135 and 139 of the Framework. The proposal's lack of compliance in this respect and the associated policy conflicts carry substantial weight.
80. It would also harm the character and appearance of the area, including harm to the significance of NDHAs arising from the total loss of the Police Station, development within the setting of the Library and the adverse effect on the group value of civic NDHAs of the Library and Hall. This would conflict with Policies 7B and 7C of the Ealing DM DPD; Policies GG2, D3 and HC1 of the London Plan; and Paragraphs 131, 135, 139 and 210 of the Framework. In totality, this harm and the associated policy conflicts carry substantial weight. As part of this, the heritage harm, of itself, carries moderate weight.
81. In relation to the NDHAs, in undertaking a balanced judgement as required by Paragraph 216 of the Framework, the considerable weight of the totality of the benefits as set out above would outweigh the moderate weight attached to the harm. Even though this heritage balance has been passed, the harms to the heritage assets are included in the overall planning balance below.
82. As well as a contribution to off-site affordable housing, the UU provides for other contributions. However, these are required as mitigation for the impacts of the proposed development, and cannot be categorised as benefits. As such, they weigh neither for nor against the proposal.
83. In light of the Council's five-year housing land supply position, and having regard to footnote 8 of the Framework, Paragraph 11(d) is engaged.

84. An overall planning balance is not a mathematical exercise. The scheme would generate wide-ranging benefits which, collectively, are afforded considerable weight. However, it would also result in a lack of compliance with the overall site allocation, and harm to the character and appearance of the area, including heritage assets. The Framework is clear that the creation of high quality, beautiful and sustainable buildings and places is fundamental to what the planning and development process should achieve; and that development that is not well designed should be refused especially where it fails to reflect local design policies³². Moreover, that heritage assets are an irreplaceable resource, and should be conserved in a manner appropriate to their significance³³. The identified harms and associated policy conflicts are each afforded substantial weight.

85. Consequently, overall, I find that the adverse impacts of granting permission for the proposed development would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, having particular regard to key policies for securing well-designed places.

Conclusion

86. The proposed development conflicts with the development plan and the material considerations do not indicate that the appeal should be decided other than in accordance with it. Consequently, for the reasons given above, I conclude that the appeal should be dismissed.

F Cullen

INSPECTOR

³² Paragraphs 131 and 139 of the National Planning Policy Framework.

³³ Paragraph 202 of the National Planning Policy Framework.

APPEARANCES

FOR THE APPELLANT:

Mr T Sangha	Mackenzie Homes (Appellant)
Mr R Conroy	Total Planning (Planning Consultant)
Mr G Redfern	Stockwell (Architect)

FOR THE LOCAL PLANNING AUTHORITY:

Mr O Nelson	Development Management Team Manager
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ADDITIONAL DOCUMENTS SUBMITTED PRIOR TO, AT, OR AFTER THE HEARING

1. Agreed Final Draft of Unilateral Undertaking. This copy was then signed at the Hearing.
2. Supplementary Planning Document 9: Legal Agreements, Planning Obligations & Planning Gain (Draft July 2007)
3. Copies of internal and external consultee responses.
4. Copy of Policy D9 of the London Plan (2021).
5. Copies of Ealing Local Planning Policy Guidance (LPPG): Ealing Character Study A1 REPORT and A2 REPORT; and Ealing Design Guidance B REPORT (2022).
6. National Heritage List for England entry for the Grade II Listed War Memorial.
7. Copies of entries in local list for Greenford Police Station, 21 Oldfield Lane South (LLR0997); Greenford Library, 25 Oldfield Lane South (LLR0998); and Greenford Hall, Ruislip Road (LLR1126).