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2 February 2021

Dear Mr Finlayson

**Planning Application relating to Perceval House, 14-16 Uxbridge Road Ealing.**

LPA reference 203275FULR3, GLA ref: 2020/6495/S1

**Save Ealing's Centre Response to the GLA's Stage 1 Report**

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I am writing to you on behalf of Save Ealing's Centre, a non-political alliance of 25 residents' associations and community groups. SEC formed in 2007 to provide a more organised voice for Ealing people to comment on development proposals within Ealing Town Centre. We provide a channel through which information about changes in Ealing Town Centre can be provided to local groups and through which those groups can feed back their views in response.

SEC has been examining the proposals jointly submitted by LBE and developers the Vistry Group Ltd to redevelop the Council offices and build 477 new homes in a very dense residential-led scheme, including a 26-storey tower that would dominate Ealing Town Centre, nearby conservation areas and listed buildings. In this connection we have noted the GLA's Stage 1 report on the scheme, which appears to conclude that, once a number of relatively minor strategic issues are addressed, the development would comply with the London Plan.

As I said in an email to you of January 13<sup>th</sup>, Save Ealing's Centre does not agree with this conclusion. To our reading, this development conflicts in fundamental ways both with the old London Plan and the new one. It is also deeply unpopular with many local Ealing people. Close to 1000 objections at the time of writing have now been posted on the application page, and objections have been submitted by Historic England, Ealing Civic Society and local Conservation Panels who are concerned about its impact on local heritage.

Objectors identify key elements of the scheme that are in serious conflict with the Publication London Plan. In his introduction to that document the Mayor wrote 'Good Growth is not about supporting growth at any cost, which for too long has been the priority, leaving many Londoners feeling excluded and contributing to a lack of community cohesion and social integration.' This is exactly what these proposals will do. For that reason alone we think it beholds on the GLA to review the scheme much more carefully than the Stage 1 report has done.

Consideration of the scheme must also bear in mind the complications inherent in a development in which the London Borough of Ealing is both the planning authority that determines the development and a co-applicant with a huge financial stake in the outcome. This is a profit-making joint venture involving the Council and a private developer, the Vistry Group, which would provide the Council not just with affordable homes but new offices and a public library.

Since the application was submitted it has emerged that the scheme is the centrepiece of the Council's £500m new Broadway Living development vehicle whose business plan was approved by the Ealing Cabinet in November 2020. The Cabinet was told that one of the most serious risks lies in securing necessary planning consents and that this could be controlled by 'close working with the planning department.' Given the Council's huge stake in the scheme how can the planning authority assess the plans objectively against plan policy as it is statutorily required to do?

The public is well aware of the pressures on officers both at Borough and City Hall level to deliver this scheme. Interests of transparency and public accountability demand that the Council's non planning business do not sway the views of professional officers who comment on it.

On its side, the Council shows no interest in addressing these conflicts and offering reassurance to the public they should serve. For example, although made under FoI legislation, the Council has not responded to repeated requests for copies of preapplication discussions between the applicant and Council planners referred to in the planning application form. In other cases the Information Commissioner has instructed the Council to make this information available when it is requested. There can be absolutely no justifiable reason why Ealing would be withholding it now.

This is a matter of so much local concern that SEC intends to pursue it through whatever channels are open to us. (Note that before circulating our submission more widely I plan to redact some names in Appendix 2 as I don't want it to become personal. That is not its purpose which is to convey the extent of the alienation with the local Ealing community).

In the first instance, however I am raising the concerns detailed in the attached submission only to you, with a request that you consider them against what we believe to be ill conceived judgements in the Stage 1 report.

Is it possible for you please to issue an addendum to the report to reflect this contribution as well as to the matters I raised in my 13<sup>th</sup> January email? If it is not, we would still welcome the GLA's comments on what we say.

More broadly we would be grateful for your advice as to other channels that exist within the GLA for us to pursue our representations about this scheme.

I look forward to hearing from you

Yours sincerely

Will French  
Chair, Save Ealing's Centre

Town & Country Planning Act 1990 (as amended); Greater London Authority Acts 1999 and 2007; Town & Country Planning (Mayor of London) Order 2008

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### **Introduction**

The London Borough of Ealing's proposals to redevelop its Perceval House offices in partnership with developers the Vistry Group were considered by the GLA in a Stage 1 report dated 9<sup>th</sup> November 2020.

A covering letter to the LBE case officer dealing with the scheme states that 'The Mayor considers that the application does not yet comply with the London Plan and Intend to Publish London Plan for the reasons set out in paragraph 95 of the above-mentioned report; but that the possible remedies set out in that report could address these deficiencies.'

Save Ealing's Centre suspects this conclusion essentially endorses the scheme subject to a few very minor changes. We do not agree. To our reading, this development conflicts in fundamental ways with both the old London plan and the new one. It is also deeply unpopular with the many local Ealing people who are distrustful of the ability of local Ealing planners to assess it impartially given the Council's huge stake in it.

This submission spells out the areas where we question the Stage 1 report's conclusions using the report's headings. It has been drafted in the first instance to the GLA's Development Management Team to request that they review their report in the light of what we say. However, SEC believes the scheme will impact so greatly on our town centre and central Ealing generally that we are looking to pursue our criticisms through whatever channels are available to us.

### **Strategic planning issues, relevant policies and guidance**

Paras 15 to 17 of the Stage 1 Report list the policies, material considerations and relevant issues, and guidance relevant to the development. These are primarily LBE's Local Plan (adopted 2012/13 so now out of date), the Central Ealing Neighbourhood Plan (adopted 2017), and key chapters from London Plan and SPGs. It is important to note in this regard that the 2016 London Plan is now superseded by the 'Publication London Plan' in which there have been significant changes over the past 24 months. Not the least of these relates to Policy D9 on Tall buildings, most recently following a direction issued in December 2020 by the Secretary of State and the Mayor's response. As confirmed by the Secretary of State on 29<sup>th</sup> January, this version will become final shortly.

As we describe below, the potential of this development in creating what would become a cluster of tall buildings in Ealing Town Centre is one of the most significant things about it. This is an aim that is clearly reflected in the Design and Access Statement forming part of the application. Approving development at this point ahead of the final adoption of the New Plan would therefore be premature. Considering that Ealing Council is a co-applicant as well

as the planning authority, it will suggest the Council is seeking to beat the New London Plan's eventual adoption date which at the time of writing has not yet been announced

This would not just look bad; it would directly contravene Para 49 of the NPPF where it provides that refusal of an application on the grounds of prematurity is justifiable in two very limited circumstances both of which apply here i.e.:

- (a) 'the development proposed is so substantial, and its cumulative effect would be so significant, that to grant permission would undermine the plan-making process by predetermining decisions about the scale, location or phasing of new development that are central to an emerging plan and
- (b) the emerging London plan is at an advanced stage but is not yet formally part of the development plan for the area.

### **Principle of development**

Save Ealing's Centre has no issue with the use of this site within the Metropolitan Town Centre for mixed residential and town centre uses.

We are, however, deeply concerned with several aspects of the development that in our view are of a scale and nature that would conflict with strategic London policies to the extent that the Mayor should direct that the development be refused. We explain our concerns under the headings below.

### **Housing**

A summary of the housing provision that forms such a major part of this development is provided in a brief section of the Planning Statement, and no Financial Viability Assessment (FVA) is included with the application. The Stage 1 report appears to accept Ealing's/the applicant's justification for this without argument. As LBE is the co-applicant of this development with a clear interest in maximising its return, the GLA surely has an obligation to examine the situation more carefully.

The Stage 1 report accepts without question the Planning Statement's claim that as 50.5% of the housing to be provided would be 'affordable' the scheme meets the London Plan's threshold for fast-track planning. The absence of an FVA makes it difficult to validate the Planning Statement's claim, but what information is provided shows that the affordable housing provision does not meet the threshold required in [Homes for Londoners: Affordable Homes Programme 2021-2026](#). The requirement here is that 50% (by room) should be reached BEFORE public subsidy (grant or discounted land) is added. But the Planning Statement says '*LBE has separately agreed a grant funding arrangement with the GLA in relation to the redevelopment of the Site and it is understood that grant funding would be used by LBE to purchase the proposed affordable housing units.*' Para 31 of the Stage 1 report confirms this - '*the Council has agreed a grant funding arrangement with the GLA*'. The 50.5% figure will therefore only be reached AFTER GRANT which means that the proposal is not in keeping with Mayoral policy and an FVA for it is clearly required.

Furthermore, the site is on council-owned land so there are no land costs. In such circumstances councils should be aiming for more than 50%. They might also be expected to include some social housing within the scheme but there is none. There is a considerable deficit of social housing in this borough which has lost 1,237 council/social units since 2003, due to estate demolition.

The need for greater transparency in the way this scheme is structured financially is demonstrated by the Planning Statement's reference to the Council's intention to use GLA grant to buy the affordable stock. We understand they propose to do this through Broadway Living, an arms-length commercial company, owned by but outside the Council's direct control. While this is supposed to be a public scheme on publicly owned land, there will be no effective public oversight or scrutiny of the scheme, now and even less so as it is delivered in the years ahead.

### **Urban design**

The Stage 1 report seems to have accepted uncritically the polished presentations by the scheme architects, Patel Taylor. These are no doubt similar to those given to local groups last year including SEC and the Civic Society, who are likely to be far more familiar with Ealing's character and local context than the authors of this section of the report. We commented in detail on what we were shown at our presentation (see appendix 1) but what we said then was disregarded. The Stage 1 report specifically commends aspects of the design that we criticised, and we presume therefore that the GLA was unaware of our comments. The key areas in which our conclusions conflict with the Stage 1 report are:

- Massing of the scheme
- Design detailing
- Alignment of the Uxbridge Road frontage

Having sought without success to feed into the scheme development this way, and bearing in mind LBE's conflict of interest in this scheme, we would request please the GLA to reconsider the Stage 1 report to consider the points we raised last year.

**Optimising development capacity and residential density.** Para 44 of the Stage 1 Report notes that the scheme has been subject to design review and extensive pre application discussions with Ealing Council (the joint applicants) and the GLA, but not in any meaningful sense at all with the local Ealing community including Save Ealing Centre. We were allowed to sit on the second meeting of the applicant commissioned design review panel, that dealt only with the detail (materials, public realm, landscaping etc) rather than first which discussed the principles of the development and on which we are at most disagreement, but we were not permitted to speak. My notes after the event recorded how deeply unsatisfactory it was. (Appendix 2)

It is important at this point to mention the Visual Impact Assessments submitted as part of this application which we believe to have been carefully designed to misrepresent its visual impacts by selective use of views to obscure the height and the visual impact of the scheme. One image goes so far as to hide the tower behind the chimney of a two storey house, although an arrow gives the viewer a hint as to where they should be looking for it. Other views disguise the tower behind trees or downplay or even omit the views entirely by a misleading choice of camera lens or the choice of a distant viewpoint. (Appendix 3)

**Tall buildings, height and massing.** SEC also takes issue with the Stage 1 report's comments on tall buildings in this location, especially given the Secretary of State's recent direction with regard to the Publication London Plan. We disagree with the report's endorsement of the development's extremely high residential density which exceeds the upper limits of the old London Plan policies.

The Stage 1 report quotes without reflecting on the adopted Central Ealing Neighbourhood Plan's CENP3 policy for this site which is both the most recent and the most detailed Local Plan policy concerned with the site. Policy CENP3 states:

*'the height, scale and massing of Percival House and the car park (CENP3) should respect and enhance the setting of the adjacent Conservation Area and listed buildings, particularly the Town Hall; that the frontage to Uxbridge Road should be of a height consistent with buildings opposite or adjacent; buildings close to Craven Avenue should be in character with the prevailing 2-3 storey height; and that redevelopment elsewhere within the site should be of a height and scale that is not intrusive, dominant or overbearing when viewed from neighbouring residential buildings or from locations within and beyond the town centre.'*

The proposals in this scheme manifestly conflict with CENP3. A 26-storey tower that looms over the listed Town Hall and the recently refurbished Pitzhanger Manor fails to satisfy the Neighbourhood Plan's test.

We totally reject any suggestion that there is a tall building cluster in this location. Our very great concern is that a development of this scale would in fact go a long way towards establishing in the minds of other potential developers the idea that such a cluster exists. This would be in direct conflict with both the Secretary of State's comments in his December 2020 direction and Policy D9 on tall buildings in the Publication London Plan.

Para 46 to 48's Stage 1 report's detailed comments which aim apparently to justify building of this scale do not stand up to scrutiny. There is reference to the 15-storey Dickens Yard tower nearby but this will be 40 metres lower than Perceval House's 26-storey tower - just two-thirds of its height. The suggestions that:

*'the articulation of the mass at upper levels into a series of layered planes contributes to its slender appearance, particularly when viewed from the north and from Walpole Park and heritage assets to the south'* or that

*location of the 26 storey building in the north-east of the site marks one of the four links across the railway line from the north into the town centre and would aid wayfinding.*

are architectural gobbledegook. Historic England seem to have no truck with them. Nor should the GLA.

**Daylight, sunlight analysis.** One of the major consequences of a development of this magnitude will be the loss of daylight and sunlight to adjoining homes. London Plan Policy D6 stresses the importance ensuring that the design of development is appropriate for its context and the Housing SPG references BRE guidelines for assessing the daylight and sunlight impacts of new development taking into account location, context, and broadly comparable housing typologies found in London. These proposals are of such a size that these things need to be assessed carefully and fairly.

Unfortunately, we don't think that this is the case for these proposals. The assessment consists of 14 volumes of reports which are simply incomprehensible for local people who do not understand the technical language. Worse, having been commissioned by the applicants, the daylight assessments are clearly written to support the development proposals and gloss over their numerous departures from BRE guidelines.

They do this for instance by wrongly stating that Ealing is an 'inner area location' and suggesting that the homes that will be deprived of sunlight lie within the Metropolitan Town Centre. (Appendix 4 provides examples.)

They go on to consider totally inappropriate developments from other locations including Barking and brownfield industrial land in Southall Opportunity Area to claim a contextual justification that does not exist. The Stage 1 letter accepts this assessment, claiming there will be 'negligible effects to the majority of neighbouring properties'. The truth is that if this development proceeds it will affect hundreds of nearby homes which is why it is so unpopular within local communities. The Council's conflicts of interest in this development surely require the GLA to take a more considered view than it has done so far.

**Historic Environment.** Particularly absent from the Stage 1 report is a serious consideration of the impact of the development on Ealing's heritage, as is borne out by Historic England's criticisms of the scheme. The point to be made is that this site, in the heart of Ealing's historic CAs, is not appropriate for a development of the scale and massing as is proposed.

Historic England raise many concerns about the impact of the scheme on Ealing's Historic environment, (Appendix 5). HE is particularly concerned about views from Walpole Park whose Grade I listed Pitzhanger Manor has recently been refurbished at considerable public expense and to the setting of the Ealing Green Conservation Area, Walpole Park and the grade II\* listed bridge in View 9. It says:

*This view along the serpentine lake is one of the key designed views within the park and is terminated by Soane's early 19<sup>th</sup> Century bridge and the later layer of mid 19<sup>th</sup> Century villas that surround the park. Despite some elements of new buildings being visible within the wider backdrop setting, this view tells the story of the former rural village setting of the grade I listed Pitzhanger Manor and the adjacent 19th Century development of low scale buildings and trees that sought to emulate and cherish this rural character. The proposed tall building imposes a central London scale of development and highly urban form that would sit directly on the axis of the designed view and is at odds with the predominantly semi-rural character of this part of the conservation area.*

The height of the scheme is such that it will visually intrude into several other Conservation Areas, two of which are already on HE's at Risk register, but there is no discussion of the impact this will cause. For these reasons alone, the conclusion in Para 57 that 'no harm would be caused to other heritage assets' is untenable. With such cursory consideration of the impact of this massive development on the historic environment the balance of benefits in Para 58 of the Stage 1 report cannot be accepted.

**Fire safety.** Para 68 of the Stage 1 Report very rightly notes the Intend to Publish London Plan's Policy D12's requirement for an independently prepared and assessed Fire Statement to be submitted with all major applications. It notes the absence of this but requests only that provided. Bearing in mind that this is an extremely restricted site with restricted street access and very high site coverage, SEC thinks the Stage 1 report ought to have gone further than that. It is not at all clear where assembly points away from the emergency services would be located for both residents and occupants of the Council office in the event of a major incident. This question surely should have been resolved at the outset, and not retro-fitted into a development after its other principles have been consented.

## **Transport**

The Stage 1 report accepts the application's claims that the development is in line with the Mayor's strategy for **green and healthy streets**. This conclusion is wrong, and the Mayor is requested to require amendments to the local highway network to reduce the amount of through traffic the development will cause to rat run through residential streets to the north of the railway.

Some years ago, the Council introduced turning bans from Longfield Avenue to and from the east along the Uxbridge Road. These bans are completely contrary to the aims of Low Traffic Neighbourhoods which have been introduced elsewhere in the Borough. Traffic to and from the North Circular Road to the east can no longer access Perceval House, or the Town Hall except by being forced along residential streets to the north of the railway. This scheme will increase this traffic, bringing pollution, congestion and noise into the streets where people live, when it ought to be confined to the Uxbridge Road, which is the distributor road for sites in the Metropolitan Town Centre.

SEC queries the approval given by the Stage 1 Report to the scheme's **inclusive design**. While it references Policy D.5 of the Intend to Publish London Plan, the report seems content to rely on assurances in the Design and Access Statement. Under the proposals, the new offices and library will severely restrict the opportunities for users with disabilities to access Council services. The existing 7 disabled parking bays, which are covered and conveniently and very visibly situated immediately outside Perceval House's Longfield Avenue entrance will be moved out of sight into the basement where they can be reached only through a lift system of a design that will be unfamiliar and rather intimidating for many users.

The Design and Access Statement seems to assume that all Blue Badge holding residents own a car and will be able to travel to and from their homes via the underground car park. This will not be possible for many Blue Badge holders who do not have their own vehicles. The drop off facility near the residential blocks and Longfield Avenue is all purpose. With so little provision for delivery vehicles and trades people, it is more likely than not to be unavailable for passengers with disabilities when it is needed.

TfL estimates that 17% of Londoners consider themselves disabled and only 4% of residents cycle. Yet the provision for cyclists in this development is far and away more generous (1,143 spaces overall) than it is for those who are disabled (30 spaces).

We also note that in the latest proposals, two on-street Blue Badge spaces on Longfield Avenue specifically welcomed by the Stage 1 report have been removed from the scheme with no announcement or explanation.

Servicing provision as indicated in the Outline Delivery & Servicing Plan appears to us to be seriously deficient for a development of this scale. Longfield Avenue can at times become seriously congested now with vehicles visiting the existing Council offices, as well as Dickens Yard and the Town Hall opposite, and we can only imagine that with so many new homes and commercial premises on the site the congestion will be much worse in the future. Except for emergency vehicles and refuse collections which will be able to use Craven Avenue, service vehicles for the entire development will use just two access points off Longfield Avenue, a service lift and just two loading bays. This cannot be adequate for a development of 477 homes even if it is car free.

The transport assessment and delivery and servicing plan think this sufficient to service new offices, ground floor commercial uses, a public library and 477 homes. But these reports were commissioned by the applicants to support their proposals and we think their conclusions need to be verified independently. Unfortunately, this is something that the Council as the planning authority is not well placed to do. Policies in the London Plan and other mayoral transport policies provide the GLA with the authority to provide this verification and we request it to do so.

## **Climate change and environment**

A fundamental objection to the development is that it would involve redevelopment of Council offices that are less than 40 years old. This flies in the face of sustainability. Materials used in the construction of Perceval House involved the use of huge quantities of energy that must be seen now to be embodied carbon.

No proper survey work was undertaken, but Ealing's Cabinet was told in 2015 that much of the building's 'electrical/mechanical services such as air conditioning, lifts, plumbing etc. are coming towards the end of its life and it is also quite energy inefficient'. This meant that it 'may require significant expenditure in the next 10-20 years to keep it functioning,' but exactly what this would entail never seems to have been explored. The GLA's Stage 1 report repeats this lazy thinking, with Para 58 going so far as to suggest that demolition of the existing offices would be a benefit: 'Replacement of an inefficient public building with energy-efficient buildings capable of future adaptation'. Did LBE omit to mention in its presentation to officers that as recently as May 2019 [the Council was congratulating itself on the energy savings](#) it had achieved at the existing Perceval House premises. It apparently achieved these benefits after 7 years of energy efficiency improvements financed through the publicly funded RE:FIT programme for making energy efficiency improvements to public sector buildings. (Appendix 6)

Expert advice is increasingly clear that tearing down existing buildings and replacing them is wasteful and unsustainable since so much embodied carbon went into their construction. As the Architects' Journal's RetroFirst campaign states 'the Greenest Building is the one that already exists'. The London Plan's consultation on whole life carbon assessments reflects exactly this approach. Its very first principle for reducing carbon emissions reads (p17) 'Before embarking on the design of a new structure or building, the retrofit or reuse of any existing built structures, in part or as a whole, should be a priority consideration as this is typically the lowest carbon option'.

This does not appear to have formed part of the Stage 1 report's thinking. The applicants must be required to undertake a whole-life carbon assessment of these proposals using a Circular Economy Statement in accordance with the GLA guidance and the [whole-life carbon assessment flowchart](#) developed by the Royal Institute of Chartered Surveyors. This must be done independently of the applicants with the results independently verified before any benefits involving sustainability are claimed from the scheme to justify the wider harm it might cause e.g. to Ealing's heritage and historic environment.

## **Conclusion**

This hugely ambitious development is a joint proposal by the London Borough of Ealing and the Vistry Group. It forms the centrepiece of LBE's ambitious new development company Broadway Living. A great deal rides on Perceval House for Broadway Living's success and SEC believes LBE's planning officers and its Planning Committee come under impossible pressure to support it.

SEC believes that in order to make it stack up financially the developers are seeking to cram far too much into the scheme. The consequent plans envisage development that is far in excess of what is appropriate in a suburban town centre. This puts them at fundamental odds with the London Plan's strategic policies.

The GLA's Stage 1 report's broad endorsement of the proposals is based, in SEC's view, on an insufficient grasp of the scheme and what it will entail. SEC is therefore seeking the GLA's reconsideration of the plans to address the issues this submission raises.

## Appendix 1

### Comments to Vistry from ECS, CENF and SEC on Perceval House proposals May 2020

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Since our meetings with you in January, and your subsequent exhibition in the Town Centre in February, current events have obviously changed all our lives and priorities and our plan to respond to you was put on hold. We hope you, your family and colleagues are all well and adapting to the new order.

However, we feel it might be helpful now, while your team is presumably still working on a planning application, to review the stage that had been reached and to register some points of community concern which remain regarding your proposals. We are particularly concerned that the proposals have been developed without due consideration of the policies in the Central Ealing Neighbourhood Plan which should be adopted for this site. The relevant policies are appended to this note and referenced as they relate to the concerns outlined below. These concerns can be grouped into four main areas:

- **Massing of the scheme and in particular the height of the tower block at the north-east corner**  
The tower block is unacceptably tall for its position in a predominantly low rise Victorian and Edwardian residential area. A reduction in the number of flats, back to the number in the original announcement of Galliford Try's involvement, together with some redistribution could result in a more acceptable solution. Arguments against this seem to revolve around a desire not to mix tenure types within a block for no particular reason. We consider that the benefits that are claimed for the proposed scheme do not outweigh the substantial harm that the scheme would cause. [Local Plan 2012 and Neighbourhood Plan Policy HBE3 and Site Plan CENP2].
- **Design detailing** We would like to see the cantilevered element of the front block rethought, principally because this feature is alien to the traditional townscape in central Ealing and it is unsympathetic to the setting of the neighbouring Grade II listed Town Hall. The particularly large area of glazing facing towards the Town Hall (together with vertical *brise soleil* elements) was suggested to indicate the so-called 'transparency' of the Council, but is not a design sympathetic to the setting of the Town Hall. We note that the Design Review Panel also raised concerns about the finishes to the underside of the canopy and supporting columns – have these now been altered? Some of us thought that the detailing of the blocks was rather fussy, with too many different colours and finishes, particularly the tower block, and a less 'busy' approach would be preferable.
- **Alignment of the Uxbridge Road frontage** This frontage would be brought forward of the building (although we accept not site) line of Perceval House and does not sufficiently respect the office corridor boulevard concept. This is integral to policy in both the Local Plan and Neighbourhood Plan, but our understanding of how this should be interpreted differs from your team's. [Local Plan 2012 and Neighbourhood Plan Policy HBE2].
- **Relationship of the development to the local highway network** Vehicle access both to and from Longfield Avenue should be directly off the Uxbridge Road which is a distributor road, and not directed through the residential streets to the north. In addition, the Council is currently engaged in a Liveable Neighbourhoods project to promote cycling and walking. Longfield Avenue has the potential to form part of a valuable north-south cycle route through the town centre and the plans should show how this could be achieved.
- **Parking and servicing access** We believe, but would like confirmed, that all parking provision for the 15 blue badge residents and 30 staff/blue badge users in the offices would be in the basement, with access from Longfield Avenue via two proposed vehicle lifts. Would the lift

capacity be adequate to ensure no delays to traffic on the road? We believe there is just one loading bay proposed outside the bollards at the north end of the site, which would be available for pre-booking but would not allow for more than one simultaneous delivery, or 'within a two hour slot' or untimed deliveries such as Amazon or DPD. Other vehicle access to the site is to be 'controlled', but it would still be the case that vehicles would be using pedestrianised spaces with the attendant risks.

We would also be pleased to see more information on those items which were discussed but where details remained to be settled:

- details of design finishes/materials
- treatment of the public realm, particularly the space between the two central blocks
- non-residential space strategy, particularly the viability of certain suggestions you have made. For example, would it be possible to offer affordable rents to those small artisan businesses that you have suggested you would like to see using the spaces? In the Neighbourhood Plan, recommended action 13 identifies that space should be provided in the Town Centre for community-related needs including a primary healthcare centre [paragraph 5.4.10]. We are aware that there is unmet demand for space for both this use and a possible Citizens' Advice Centre – has any consideration been given to meeting these identified needs?

As there appeared to be some doubt at our meeting about which policies we were referencing, for clarity we have appended details of these below. We remain concerned that these policies have not been properly considered in the proposed scheme, and these should be addressed before submission of the planning application.

We remain ready to discuss any of the above issues in greater detail if it would be helpful, for example using video conferencing.

## Appendix 2

### Second Meeting of the Perceval House Design Review Panel

17 December 2019.

#### Notes of a 'community representative'

Ealing has employed a Design Review Panel to advise on the evolving plans for Perceval House. I was invited to attend the second of their meetings on behalf of SEC. Here for the record is what transpired.

Along with the 3 panel members also at the meeting were representatives of Galliford Try, the scheme architect, DP9 planning consultants and LBE planning. Probably some others but I missed their names in the speedy canter round of introductions.

Three representatives of the community were there and we were directed to the seats reserved for us at the back. Four had been invited but Bob Gurd representing the Civic Society was under the weather and sent apologies. Robert Gordon Clark for Dickens Yard and Carolyn Brown from Hanwell were the other community representatives. There was no space for anyone from the homes nearby in Craven Avenue or Gordon Road who will live in the shadow of and be overlooked by the 28 storey tower.

The panel consists of three late middle-aged men who clearly all read the same newspaper and shop in the same store. They look like they lunch well too and use these occasions to fine tune their opinions. These ranged from Alfred the Great's innovative plan for regenerating Winchester after the Romans to a poor choice of colour palate proving a missed opportunity at Portcullis House.

The Panel declared a growing fondness for Ealing. This may be because they have now been commissioned to do four design reviews here but they didn't say where. [REDACTED] is the chair. Evidently a man of some distinction, [REDACTED]s ex chair of CABE and identified himself as a contributor to the Architects Journal. I was interested to see in the AJ his endorsement of the recently published National Design Guidelines that are now a material consideration in planning applications. Para 17 of these guidelines recognises that local communities can play a vital role in achieving well designed places. Perhaps [REDACTED] didn't get that far into this document. He showed no interest in Ealing's community representatives.

This was the panel's second meeting. The first, at which no one from the community was present, had dealt with the scheme fundamentals including the development quantum, height and massing, access both to the development as a whole and to individual buildings and the like. All these matters are now regarded as having been settled. Discussion of them was off the agenda.

Instead we were treated to a 45 minute slideshow presented by the scheme architect Pankaj Patel, director of the Patel Taylor architectural practice that Tony Pidgely apparently places at the top of his list. Pankaj has also served on CABE's Design Review Panels. Perhaps he also reads the same newspaper as the three Panel members.

Having nailed down all the scheme's fundamentals at the Panel's first closed meeting, Pankaj was free to concentrate on the scheme's architectural detailing, materials, public realm and landscaping. Things began with a variable speed fly round of the development to highlight the quality of its finishes. This was in brilliant colour, though Pankaj did admit that a level of poetic license had been employed to display all the flowers in bloom.

Pankaj's delivery was extremely lyrical but much of it went right over my head. A vast palette of materials and textures will be employed all of which we were assured reflect Ealing's traditions as the Queen of the Suburbs. For some reason yellow London stock was not included but the development will feature plenty of glass with wrap around windows, and chrome pillars at the library entrance. Mottled multi-coloured terracotta tiling inspired by a pot thrown by a Welsh potter will be a big feature. These tiles will be 'noble and timeless'. They will change colour during the day with the passage of the sun.

I have to say, I was pleased that almost all the residential units are dual or triple aspect, and that social and market residential units will be built to the same design and be tenure blind.

The Panel was very impressed with Pankaj's exposition and heaped glowing praise on its quality. Of course they found points to criticise. They were there after all as a design review panel. Some of their comments were very valid. Wouldn't the chrome columns date quickly? Where is the maintenance plan that will cover the whole lifespan of the development? Sitting as we were in Perceval House whose justification for redevelopment after just 30 years supposedly arises from the fact that the lifts need replacing, this seemed an extremely valid point.

Community representatives (which had now reduced to two as Robert Gordon Clark had another meeting to attend) were not invited to speak. I had early on sought clarification about arrangements for servicing the development but I was sternly shushed and I dared not risk reoffending. Instead, we launched into the next lecture which waxed with equal lyricism on plans for the public realm and landscaping. 'Really inspired by the heritage of the area', the theme was the richness of the palette, the blending of old and new, transitioning between different parts of the town centre to deliver a 'robust urban environment'.

It was now 12.40. When first notified of the meeting I was told it would run from 10.30 - 12.30, and I had another appointment to go to. So I left as the landscaping strategy was getting under way leaving only Carolyn, if she was given a chance, to speak for the whole Ealing community.

██████████ followed me out of the room to regret my departure. I am ashamed to say I replied to her with some grumpiness, explaining that I felt my presence there was part of a tick box exercise designed for GT to claim the public had been involved in the design of the scheme. I said I did not want to let myself be used that way. There had been no response to the comments SEC and others made when we met the developer in August. Besides, I had to leave as I had other things on my mind and other things to do that day.

Carolyn tells me that at the end of the meeting she was permitted to ask a few questions without receiving very clear answers to them. ██████████ then promised that the panel

would submit its report before the end of the week ie "before the Christmas rush". Job done then. The scheme is set in stone. Let the public consultation on it now commence.

Will French, Chair Save Ealing's Centre

19 December 2019

### Appendix 3

**Question:** How do you hide a 26-storey tower?

**Answer:** Here's how they do it in the Perceval House Planning application:

1. Pretend it's a chimney (the arrow included in the D&A statement is a clue)



2. Pretend it's a wire frame and hide it behind a tree



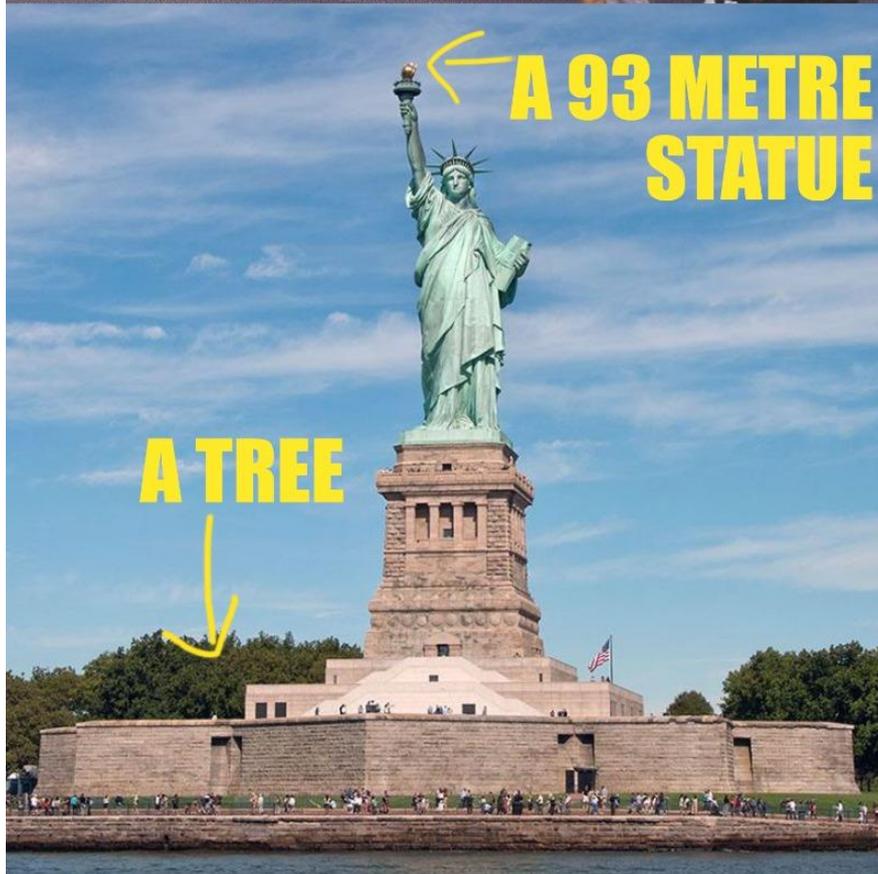
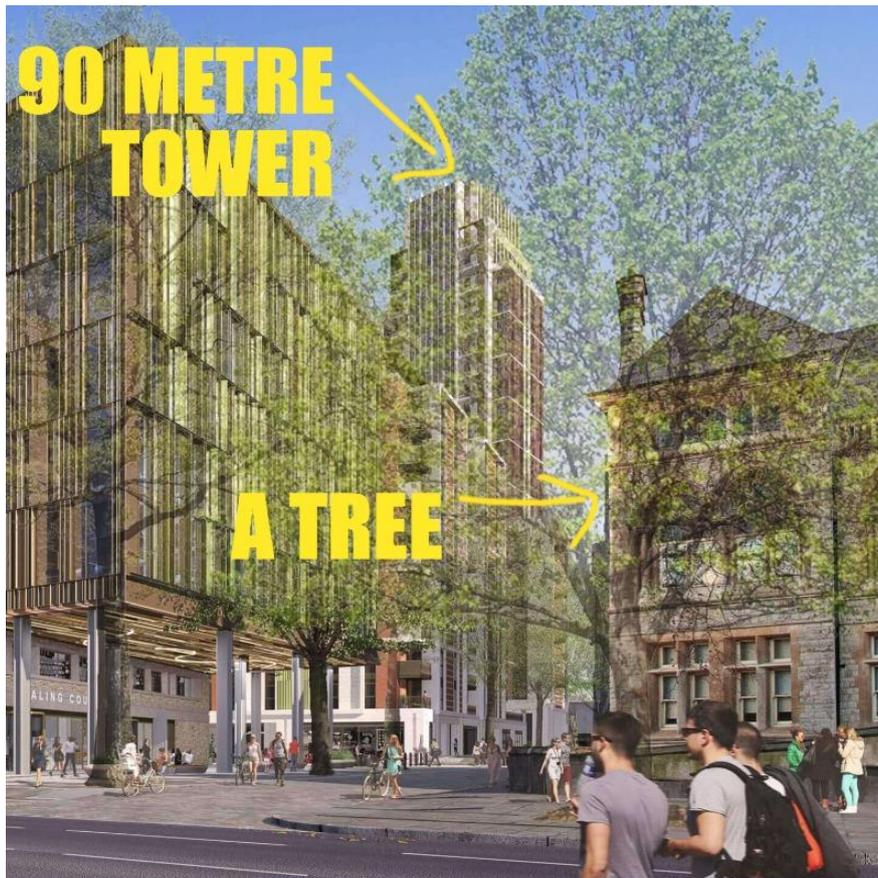
3. Photograph it in summer with leaves in front



4. View it from a very long way away through a wide-angle lens



There are other ways of seeing things.



So just what will the tower look like? You decide.

# Perceval House... taller than you thought?



## Appendix 4

### Perceval House Daylight Sunlight Assessments

Done on behalf of developers Ealing Council and Vistry by a firm called GIA

#### Key Points

- (Deliberately?) Complicated to read especially for laypeople, findings buried across 14 files
- Many nearby homes will be affected. Few of them realise it.
- No analysis of loss of light in gardens. Many homes will be seriously affected.
- Many exceed BREEAM's industry standard guide lines.
- A few properties will suffer 100% loss of expected daylight, a lot over 50%.
- The assessment is not impartial - it's been written to promote the scheme. One device is a 'contextual analysis' of developments elsewhere that claims to justify the impact here.
- There's no concern at all for the loss existing owners/occupants will experience eg:
  - Loss of light is claimed to as be something expected for inner city locations. Ealing isn't inner city. It is an historic Victorian suburban town centre, almost surrounded by CAs
  - Homes affected on Gordon Rd and Craven Av are not even in the Town Centre. Standing in residential streets they are Victorian/Edwardian family homes.
  - Except for DY whose highest tower is just 66% the height of Perceval House the other sites used for the contextual analysis are completely different to this location.

#### Properties affected

GIA identifies the following 35 properties as 'relevant for daylight and sunlight assessment'. Some of these are flats so far, far more are affected really:

21 Gordon Road	51 Gordon Road	77 New Broadway
23 Gordon Road	53 Gordon Road	75 New Broadway
25 Gordon Road	55 Gordon Road	73 New Broadway
27 Gordon Road	57 Gordon Road	71 New Broadway
29 Gordon Road	59 Gordon Road	Ealing Filmworks
1-21 Berkley Court	63 Craven Avenue	57 New Broadway
1-28 Vernon Court	52 Craven Avenue	55 New Broadway
41 Gordon Road	54 Craven Avenue	Apsley House
43 Gordon Road	56 Craven Avenue	Belgravia House
45 Gordon Road	1-55 Longfield House	Skyline Apartments
47 Gordon Road	81 New Broadway	1-47 Fitzroy Apartments
49 Gordon Road	79 New Broadway	

The report claims 'the following 18 properties adhere to the numerical values set out within the BRE Guidelines' so there is no detailed assessment of them. They will be affected by the development all the same

21 Gordon Road	53 Gordon Road	55 New Broadway
23 Gordon Road	55 Gordon Road	1-47 Fitzroy Apartments
25 Gordon Road	57 Gordon Road	
27 Gordon Road	59 Gordon Road	
29 Gordon Road	73 New Broadway	
45 Gordon Road	71 New Broadway	
49 Gordon Road	Ealing Filmworks	
51 Gordon Road	57 New Broadway	

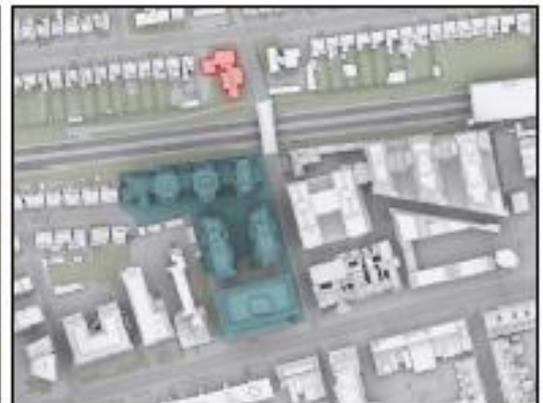
These are all shown in the image below:



### Findings for individual properties

(Passages below are lifted verbatim from the assessments. No attempt is made here to explain the technical jargon. Suffice to say that they mean the normally expected impacts are being exceeded)

#### 1-28 Vernon Court



There are transgressions in VSC beyond the BRE Guidelines which will be noticeable due to the location of the development massing, however, the retained values are in line with what is typically achieved in other broadly comparable typologies within London.

In GIA's opinion, the technical alterations should not be considered in isolation and weight should be given to the demands of planning policy/guidance (see Section 4.0), the application site's location in a Metropolitan Centre and its allocation for increased development.

63 Craven Avenue



In summary, there will be noticeable changes in VSC at a small number of windows.... The BRE transgressions above should not be reviewed in isolation and in GIA's opinion, consideration should be given to the contextual factors and the demands of planning policy/guidance.

**54 Craven Avenue**



In conclusion, there will be changes in VSC which will be noticeable, however the retained daylight values are largely in line with what the GLA consider to be acceptable for an inner urban location. ... Furthermore, all rooms will achieve BRE compliance in relation to NSL. In terms of sunlight, this property is not relevant due to its orientation.

The alterations beyond the suggested BRE guidance should not be reviewed in isolation and in GIA's opinion, consideration should be given to the contextual factors and the demands of planning policy/guidance as detailed in Section 4.0-7.0 of this report.

## Longfield House



Due to this property's proximity to the proposed development, there will be changes in daylight (VSC and NSL) which will be noticeable.

The existing levels of light on the ground and first floor of Longfield House are generally circa 13%-18%, which is much lower than the BRE's 27% ideal (see Section 5.0). In the proposed situation, the windows which experience the lowest retained VSC values are located on these levels. This is illustrated on the window maps below. (Note that blue, purple then red give the lowest readings).



Whilst there will be noticeable changes in daylight and sunlight to this property by reference to the BRE methodology, in GIA's opinion, consideration should also be given to the specific site context (located in an evolving Metropolitan Centre which is identified for regeneration and growth) and its allocation for redevelopment. Furthermore, weight should also be given to relevant policy and guidance as detailed in Section 4.0 with particular reference to the recommendations set out within the Housing SPG and the contextual research undertaken by GIA.

## 1-70 Apsley House



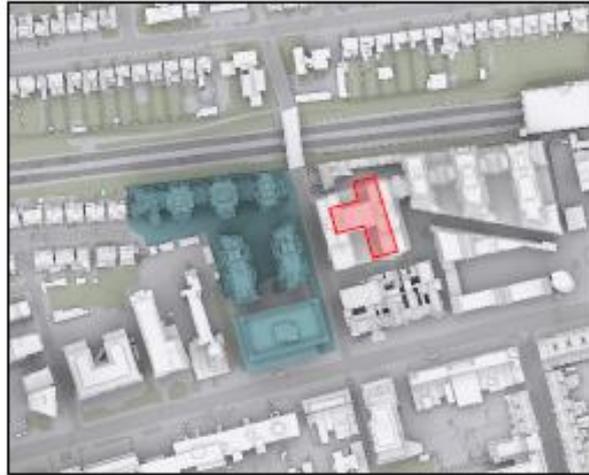
When increasing density (in line with comparable sites) on a site of this nature, it is generally expected and accepted that there will be retained daylight levels which are much lower than the unusually high existing values. In consideration of the retained VSC values, 81 of the impacted windows will achieve less than 14.9% VSC, 42 windows will achieve values in the 15% and 19.9% range and five windows will see values in the 20-26.9% bracket. The windows which experience the lowest retained values are located on the lower levels of Apsley House on the site facing elevation. *(Note that blue, purple then red give the lowest readings)*



Figure 15 – Proposed VSC values at Apsley House

It is inevitable when increasing density on a site of this nature (i.e. partially underdeveloped) that breaches in the BRE Guidelines will occur and there will be lower retained daylight values from the existing to the proposed situation.

## Belgravia House



There will be changes in daylight (VSC and NSL) and sunlight (APSH), which may be noticeable to the occupants. However, the largest VSC changes (57.1%-90%) occur to windows that have existing low values (1%-4.1%) as a result of the existing architectural form.

In consideration of the retained VSC values, 15 of the impacted windows will achieve less than 14.9% VSC, three windows will achieve values in the 15% and 19.9% range and one window will see values in the 20-26.9% bracket.

In terms of NSL, of the 13 impacted room, 10 are to bedrooms, which the BRE recognize being less important compared to other rooms. The remaining three rooms occur to single aspect LKD's that are deeper than 5m and therefore, greater movement of the no sky line can be unavoidable.

## 41 Gordon Road



There are nine rooms relevant for assessment in this property, of which six (66.7%) will achieve BRE compliance to both daylight methodologies (ie 33% don't). Three (ground floor) windows see a 'small technical breach beyond guidance' of between 20.1% to 20.2%. The remaining window sees a 25.5% change.

Mr Gregory Gray

Direct Dial: 0207 973 3777

London Borough of Ealing

Perceval House

Our ref: P01255190

London

W5 2HL

5 October 2020

Dear Mr Gray

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**PERCEVAL HOUSE 14-16 UXBRIDGE ROAD EALING LONDON W5 2HL  
Application No. 203275FULR3**

Thank you for your letter of 8 September 2020 regarding the above application for planning permission. On the basis of the information available to date, we offer the following advice to assist your authority in determining the application.

**Summary**

Historic England has concerns regarding the proposals, particularly in relation to the impact of the proposed tall building on the setting of nearby heritage assets.

**Historic England Advice**

**Significance**

Perceval House is located on a prominent corner position at the heart of Ealing Town centre. It contains the main administrative offices for the London Borough of Ealing and forms part of a small cluster of civic buildings. Perceval House dates from the 1980s and is arranged over ground plus five storeys with roof plant. It has a distinctive architectural design with brown tiled elevations, corner turrets and projecting balconies. The site also includes an area to the north of Perceval House containing an electricity substation and car park, which bounds onto Longford Avenue to the east and the railway line to the north.

Whilst the site is not located within a conservation area, it is in close proximity to a number of conservation areas and listed buildings, including the grade II listed Ealing Town Hall, which lies immediately to the east of the site. The Town Hall is designed in a Gothic style with raglan stone elevations and an ornate roof line punctuated by a

clock tower. Christ Saviour Church lies further to the further to the east of the site and is grade II\* listed. The church is also faced in raglan stone and has a distinctive spire that is visible in many local views. The site is located to the north of the Ealing Green Conservation Area, which contains the grade II Registered Park and Garden of Walpole Park. The park is historically associated with the grade I listed Pitzhanger Manor, which was remodelled by the renowned architect Sir John Soane in the early 19th century. Of note within the landscape is a serpentine lake to the east of the manor which is visually terminated by a grade II\* listed bridge, which was refaced by Soane in rubble and flint to give an appearance of antiquity within the landscape.

### **Impact**

The proposals are to demolish Perceval House and redevelop the entire site to provide a range of new buildings. A new 9 storey building containing office accommodation for the London Borough of Ealing would be provided on the corner of Uxbridge Road and Longfield Road, whilst a further five new buildings would be provided to the north containing a mix of retail and residential accommodation. These would range in height from 3 storeys up to 11 storeys with a 21 storey tower on the north east corner of the site, adjacent to Longfield Avenue.

### **Policy**

Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 (as amended) set out the obligation on local planning authorities to pay special regard to safeguarding the special interest of listed buildings and their settings, and preserving or enhancing the character or appearance of conservation areas.

The National Planning Policy Framework (NPPF) sets out the Government's policies for decision making on development proposals. At the heart of the framework is a presumption in favour of 'sustainable development'. Conserving heritage assets in a manner appropriate to their significance forms one of the 12 core principles that define sustainable development.

Paragraph 131 of the NPPF refers to new development sustaining and enhancing the significance of heritage assets and making a positive contribution to local character and distinctiveness; paragraph 132 refers to the of a proposed development on the significance of a designated heritage asset, including development within its setting; and paragraph 137 also states that local authorities should look for opportunities for new development within Conservation Areas and within the setting of heritage assets to enhance or better reveal their significance.

When considering proposals which might affect the significance of designated heritage assets, decision makers are required by the NPPF to give great weight to their conservation, and to be satisfied that any harm is clearly and convincingly justified, and outweighed by the delivery of public benefits (Paragraphs 193-196).

### **Position**

As these proposals include the provision of a tall building, they will clearly have an impact on the setting of heritage assets located some distance from the site. In many of the views illustrated within the Townscape and Visual Impact Assessment,

which accompanies this application, we consider the proposals to cause a degree of harm to the setting of the affected heritage assets. We have identified three key views where the setting of designated heritage assets would be particularly affected by the proposed new building, as follows:

- View of the grade II\* listed Christ the Saviour Church looking west along the Broadway, as illustrated in View 3. This view is seen from within the Ealing Town Conservation Area, where the proposed tall building appears in the clear sky space between the tower of the church and the completed Dickens Yard buildings on the Broadway frontage.
- View of the grade II listed Ealing Town Hall looking north west along New Broadway, as illustrated in View 4. This is a dynamic view within Ealing Town Conservation Area where the proposed tall building appears behind the gothic roofline of the Town Hall.
- View of the grade II\* listed bridge in looking north through GII Registered Walpole Park, as illustrated in View 9. The proposed tall building appears in the backdrop setting to park, bridge and 19<sup>th</sup> century villa houses framing the north side of park, all located within the Ealing Green Conservation Area.

The proposed tall building is considered to have a harmful impact on the setting of the listed Christ the Saviour Church, Ealing Town Hall and the general character and appearance of the Ealing Town Centre Conservation Area, as illustrated in Views 3 and 4, by reason of its presence on the skyline and the potential that this has to draw the eye away from the foreground buildings within the conservation area. This harm is considered to be less than substantial in policy terms and could be mitigated through a reduction in height of the proposed tall building. We are also of the view that the vertical red stripe on the east elevation of the proposed tall building serves to increase the presence and dominance of this building in View 3 in the context of the Christ the Saviour Church. As such, we would recommend that, as a minimum, the proposed elevational treatment of the tall building is reconsidered in order to reduce its visual presence and dominance in this view.

The proposed tall building is considered to create a high degree of less than substantial harm to the setting of the Ealing Green Conservation Area, Walpole Park and the grade II\* listed bridge in View 9. This view along the serpentine lake is one of the key designed views within the park and is terminated by Soane's early 19<sup>th</sup> Century bridge and the later layer of mid 19<sup>th</sup> Century villas that surround the park. Despite some elements of new buildings being visible within the wider backdrop setting, this view tells the story of the former rural village setting of the grade I listed Pitzhanger Manor and the adjacent 19<sup>th</sup> Century development of low scale buildings and trees that sought to emulate and cherish this rural character. The proposed tall building imposes a central London scale of development and highly urban form that would sit directly on the axis of the designed view and is at odds with the predominantly semi-rural character of this part of the conservation area. This harm could again be mitigated through a reduction in height of the proposed tall building.

Whilst we may consider the harm to heritage assets identified above to be less than substantial in policy terms, we would refer you to policies 194 and 196 of the National Planning Policy Framework. These policies are reflected in the Draft London Plan and Policy D8, part d, of the plan relates to tall buildings and states that '*proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and there are clear public benefits that outweigh that harm*'. As such, we would recommend that your authority takes these policies into account when coming to a decision on the proposals and seeks to mitigate harm where possible.

### **Recommendation**

Historic England has concerns regarding the application on heritage grounds. We consider that the issues and safeguards outlined in our advice need to be addressed in order for the application to meet the requirements of paragraphs 196 of the NPPF.

In determining this application you should bear in mind the statutory duty of section 66(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to have special regard to the desirability of preserving listed buildings or their setting or any features of special architectural or historic interest which they possess and section 72(1) of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas.

Your authority should take these representations into account and seek amendments, safeguards or further information as set out in our advice. If there are any material changes to the proposals, or you would like further advice, please contact us.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

Yours sincerely

### **Claire Brady**

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

Mr Gregory Gray

Direct Dial: 0207 973 3777

London Borough of Ealing

Perceval House

Our ref: P01255190

London

W5 2HL

21 December 2020

Dear Mr Gray

**T&CP (Development Management Procedure) (England) Order 2015  
& Planning (Listed Buildings & Conservation Areas) Regulations 1990**

**PERCEVAL HOUSE 14-16 UXBRIDGE ROAD EALING LONDON W5 2HL  
Application No. 203275FULR3**

Thank you for your letter of 8 September 2020 regarding the above application for planning permission.

Historic England Advice

This advice follows on from our letter of 5 October 2020 and the recent submission of amended plans.

In our letter, we stated that the proposals were considered to have a harmful impact on the setting of the grade II\* listed Christ the Saviour Church and the Ealing Town Centre Conservation Area. This was due to the presence of the tall building on the skyline and the potential this has to draw the eye away from the foreground buildings within the conservation area. This impact was illustrated in View 3 of the Townscape and Visual Impact Assessment. We recommended that, as a minimum, the proposed elevational treatment to the east side of the tall building be reconsidered to reduce its visual presence and dominance in this view.

The amended proposals remove the red vertical stripe from the eastern elevation of the proposed tall building and introduce a less prominent colour palette. As such, we confirm that this amendment has addressed our recommendation in this regard.

Please note that all other recommendations and comments expressed in our letter of 5 October 2020 still stand.

We also suggest that you seek the views of your specialist conservation advisors, as relevant.

This response relates to designated heritage assets only. If the proposals meet the Greater London Archaeological Advisory Service's published consultation criteria we recommend that you seek their view as specialist archaeological adviser to the local planning authority.

The full GLAAS consultation criteria are on our webpage at the following link:

<https://www.historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/our-advice/>

It is not necessary for us to be consulted on this application again, unless there are material changes to the proposals. If you would like detailed advice from us, please contact us to explain your request.

Yours sincerely

**Claire Brady**

Inspector of Historic Buildings and Areas

E-mail: [claire.brady@HistoricEngland.org.uk](mailto:claire.brady@HistoricEngland.org.uk)

## Council head office receives best energy rating yet

LATEST NEWS

MAY 16, 2019



**E**aling Council has slashed its headquarters' energy bills by more than a million pounds and the building has received its best ever energy efficiency certificate.

Perceval House, in Uxbridge Road, was recently given its highest rated Display Energy Certificate (DEC) to date after embarking on more than seven years of energy efficiency improvements since 2012. In the process, the council has saved a total of £1.2million in reduced energy bills at the five-storey building.

In 2012 the building had a G-rated energy assessment, the lowest band on the DEC rating system. This meant that the building was significantly underperforming in terms of efficiency, with energy and money being wasted and having a far larger carbon footprint than needed.

Currently the head office has a rating of a D, meaning it performs better than a typical building of its type and size. Council officers from the sustainability and facilities management teams have made immense improvements and will continue to introduce measure to further reduce the council's energy bill.

When officers first embarked on a programme of energy efficiency to improve the performance of the building, they accessed the RE:FIT programme – a scheme available for the public sector to make energy efficiency improvements to its buildings.

The works included infrastructure upgrades such as more efficient lighting, controls and cooling the IT server room with natural ventilation.

Since these works were complete in late 2015, work has been carried out to continue to reduce energy consumption even further.

Perceval House was using 5GWh electricity and 2GWh gas per year in 2012 and this has now been reduced to 3GkWh electricity and 1GWh gas.

Lucy Taylor, the council's director of regeneration and planning, said: "Achieving such dramatic savings for a number of years is a credit to the work of the officers involved. They're leading the way in terms of creating a more sustainable working environment. The council continues to reduce its energy consumption across its buildings and encourages staff to be aware of their usage."

### **Reduce your energy bills**

If you would like to reduce your energy bills, take part in the Big London Energy Switch. It's free and an auction is being held on 21 May. Sign up [here](#).