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By email to: planning@ealing.gov.uk,
GrayG@ealing.gov.uk

19 October 2020

Dear Mr Gray

Consultation on Perceval House Redevelopment Proposals
Application: 203275FULR3

Save Ealing's Centre is a non-political alliance of 25 residents' associations and community groups which formed in 2007 to provide a more organised voice for Ealing people to respond to development proposals within Ealing Town Centre. SEC seeks to be a channel through which the Council can feed development proposals in the town centre to local groups and through which those groups can express their views back to the Council.

SEC has a number of objections to this application as we describe below. This letter contains more characters than the Council's online objections page permits us to post, so this letter is being emailed to you with a request that you display it alongside other comments on the application website. We shall also submit online a summary objection to signpost this letter.

1. The planning authority is impossibly conflicted. As the landowner and the development partner in this scheme, the Council appears irredeemably compromised in its role as the planning authority. Because of this, SEC feels it will not be possible for you and your colleagues to work independently under the direction of the regeneration team which led the Council into partnership with Vistry. We do not see how either you or the Planning Committee, to whom it will be submitted for determination, will be able to assess it fairly against development plan policies as you are required to do. We think these proposals conflict in very many ways with the NPPF, the Intend to Publish London Plan, the Ealing Local Plan and the adopted Ealing Town Centre Neighbourhood Plan, but we fear that fact will carry very little weight for a Council that has so much to gain from the scheme.

Vistry and their architects have been quite frank with us that the scheme's excessive height and bulk are inevitable given the demands that Ealing Council, as the landowner and their development partner, are making on them in terms of what they require from the project. Their partnership agreement requires Vistry to provide new Council offices, a new public library and 50% of the new homes to be handed over to the Council's housing company Broadway Living. To make a profit from delivering all this Vistry needs a development of the scale proposed to give them enough new homes to sell for themselves.

2. Lack of genuine engagement. SEC has responded at every opportunity to Vistry's agents in the pre-application discussions relating to this application. We have participated in

briefing meetings with Vistry's architects and planning advisors, attended public exhibitions and the second - and the only non-private - meeting of the Design Review Panel, attended by LBE officers and at which we were forbidden from speaking. After each of these events SEC provided extensive comments in writing on the proposals as they evolved, and we are extremely disappointed that not a single element in this development reflects anything we said.

We cannot agree therefore with the applicants' claim in their 3 volume Statement of Community Engagement that they have 'demonstrated a commitment to engaging with local and political stakeholders, along with residents'. It feels to us that we have been involved in what has turned out to be a tick box exercise aiming simply to enable this document to be included as part of the planning application.

3. Perceval House should be refurbished, not demolished. Our most fundamental concern is that this development is being proposed at all. Less than 40 years old, Perceval House is a relative newcomer to Ealing. Materials in its construction involved the use of considerable energy which now needs to be regarded as embodied carbon. While no survey work was done, 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,' although exactly what this would entail never seems to have been explored.

The recent London Plan consultation on whole life carbon assessments challenges this approach. Its very first principle for reducing 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'. A Council like Ealing's which is leading the war against climate change really ought to have done this. It also needs to undertake a whole life carbon assessment to clarify the energy costs of redevelopment.

4. Excessive Height and Density. SEC's major criticism of the scheme as proposed relates to its excessive height and density. These are completely out of keeping with Perceval House's setting immediately behind the Grade II listed Town Hall and surrounded by residential Conservation Areas whose amenity will be egregiously harmed through overshadowing, overlooking and loss of privacy. We reject the applicant's suggestion that there is a 'townscape context' for a building of the height and bulk proposed. To the contrary, there is no policy for tall buildings in Ealing Town Centre, which remains a place of Victorian and Edwardian scale.

We are deeply disturbed about the creeping approach in recent years for taller and taller elements to be introduced into Ealing, each one of which claims to be justified by the last. The consequence is an ugly jumble of oversized concrete breaking up key views into and within our Conservation Areas. This has lead to two of them - Haven Green CA and Ealing Town Centre CA - being identified as 'at risk' by Historic England. Key views such as from Bond Street and Haven Green have already been badly harmed by these new developments, and we fear the current proposals will make things much worse.

We see that Historic England has objected strongly to this development with regard to the height of the tower and the impact that it will have on key views involving listed buildings. In the past the Council has sometimes disregarded HE's comments - eg with the Glenkerrin and 9-42 the Broadway schemes and granted consent for developments

only for the Secretary of State to call them in. In the case of 9-42 the Broadway a proposed tower was just 18 storeys high compared to the current plans for 26 storeys here. SEC agrees with HE's comments about the need to retain Ealing's heritage, so, were this scheme to be approved as now proposed, we would use whatever channels are available to us to call for it to be examined by an independent inspector.

We note that in selecting Galliford Try (Vistry's predecessors) as Ealing's development partner, officers criticised the scheme proposed by the other shortlisted candidate, Muse. At 24 storeys they said Muse's proposal would 'pose some challenges around the visibility over the roof line of the listed Town Hall building'. At that point Galliford's scheme was just 20 storeys. It has since increased for reasons that have never been explained to 26 storeys.

5. Inadequate Visual Impact Assessments. We are not at all satisfied that the Visual Impact Assessment undertaken as part of the application adequately reflects what the impact of the development would truly be. Photographs in the assessment have used a wide-angle lens which diminishes the relative size of items - such as the tower - in the medium to far distance. A much better impression would be provided by a 50mm lens. We are unclear why so many views use only a wire frame rather than the full elevation detail. Many of the views seem to have been carefully selected to underestimate their real significance. They have been hidden behind trees or taken from a particular point where they would be obscured by a building whereas they would appear if the camera was moved a few paces to the side. Most ludicrously in supplementary view A11, the tower seems to be disguised as the chimney of a house. We also disagree very strongly with the visual impact assessments themselves. It is quite ludicrous for instance to say that Views 3, 4, 5, 8, 17, 20, would be beneficial in nature and Views 9,15, 18, 19, would be neutral.
6. Housing tenure and housing mix. The housing tenure and mix of units is not what the people of Ealing need. Ealing needs family homes that are affordable by local people. Broadway Living will take less than 50% of the new homes and they will make 156 of them available at rents above 'affordable' levels as the Mayor has defined it. So just 70 of the 477 flats will be available to rent at a price the people who really need them can afford. Over 50% of the new homes being built would be available on the open market. Currently homes are being marketed as strongly overseas as they are in this country. There seems nothing to prevent these homes being disposed of in this way.

Ealing also has a well documented need for family sized homes. Incredibly only 7 of the 477 units will contain 3 bedrooms.

7. Ground Floor commercial units. We remain unclear about the justification for the commercial ground floor units in the blocks behind the new Council offices. Who is expected to fill them? Most of Dickens Yard's commercial units remain empty years after they were completed and Dickens Yard is much better located for commercial use than Perceval House. More across the road at Ealing Filmworks will come available shortly. It seems highly unlikely that the need to expand Town Centre uses post Covid is going to increase any time soon. Would it not be wiser to use this space for residential purposes so it becomes an opportunity to lower the height of the tower?
8. Alignment of the Uxbridge Road frontage We object to the siting of frontage of the office development forward of the existing building line of Perceval House. Both the Local Plan and the Central Ealing Neighbourhood Plan, provide for the creation of a boulevard along Ealing's office corridor. The proposals would significantly undermine this policy.

9. Design detailing. We have participated in quite lengthy discussions about design detailing with the architect and planning agent and are very disappointed that they have not been prepared to amend their plans to reflect any of the concerns we have raised. We particularly regret their readiness to respond to comments from the Design Review Panel who are outsiders from Ealing and demonstrated little feel for the borough, but have resisted the experience and expertise of Ealing Civic Society whose members' have an unmatched knowledge about the Borough and its history. Considering we are dealing with at Risk conservation areas and the setting of listed buildings, it is unacceptable that ECS's was not drawn on. ECS remains, for instance, particularly critical of the cantilevered element fronting Longfield Road which they say is not a design sympathetic to the Town Hall next door, but their opinions are ignored.
10. Traffic down residential streets. We do not understand why when the Council has become so committed to the creation of Low Traffic Neighbourhoods to eliminate rat-running from residential streets it seems to be encouraging this behaviour here. Turning bans at the southern end of Longfield Avenue to and from the Uxbridge Road will force North Circular Road traffic visiting or departing from the site to use the residential streets north of the railway. This looks likely to include construction traffic. The far more consistent approach would be to lift the Longfield Rd turning bans and either restrict or totally close traffic at the railway bridge.
11. Parking. SEC is broadly sympathetic to the objective of car-free development in the town centre, but what is proposed here is completely inadequate. 477 homes need to be serviced and receive deliveries, and the single off-street loading bay in the north eastern corner of the site will not be able to cope with the demand. We understand peak hour deliveries would be discouraged through consultation with building occupiers and that a computer/web-based vehicle booking system would spread deliveries throughout the day. This will not be adequate to cope with the demand from so many homes.
12. Cycle facilities. SEC does not understand why the opportunity to introduce a north-south town centre safe cycle route along Longfield Avenue has not been exploited. The need for a safe north-south route through the town centre has long been recognised, and Longfield Avenue, with its links to Longfield Walk to the north and Barnes Pike to the south could provide it. Moreover parking for 1,243 bicycles is proposed within the development, and all these cyclists will need to approach it either from the north or south. Remodelling the junctions at both ends of Longfield Avenue to make them for cyclists would seem to provide a relatively easy solution.

In conclusion, Save Ealing's Centre objects to this development for the reasons set out above. As the case officer dealing with this scheme we trust you will be able to set aside any narrow interests of the Council and examine the proposals against the requisite national, regional/ borough and neighbourhood polices.

Yours sincerely

Will French
Chair
Save Ealing's Centre