

Perceval House Redevelopment Weighing up the Balance

The Officer report says where harm to heritage assets arises it must be outweighed by substantial public benefits.

So the report lists 12 benefits of the scheme, and concludes that these 'are considered to have sufficient weight to outbalance the less than substantial harm to the significance of the heritage assets.' It says these 'tip the balance ... in favour of the supporting a grant of permission for this positively beneficial development'.

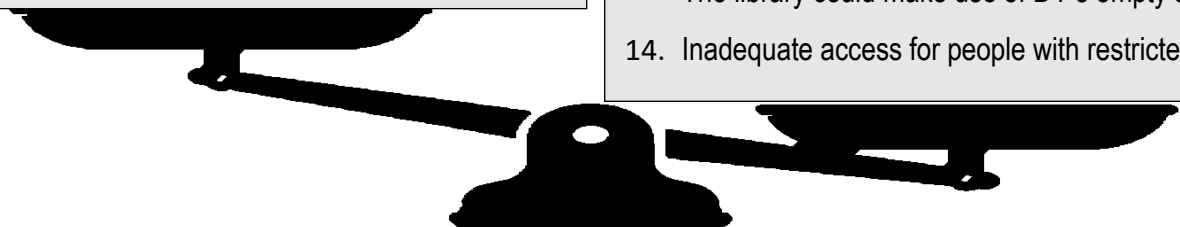
However, none of the proposed 'benefits' are without problems, **shown in red**, many of them very serious. And no effort is made to balance them against the many disbenefits objectors have raised. A balancing exercise needs to look at both sides of the equation. When you do this it becomes clear that, overall, arguments against the proposals outweigh those in favour.

Planning Officer's claimed benefits

1. 477 new dwellings, new civic offices, customer services, relocated library. (BUT Perceval House and its customer services are perfectly adequate. The library will be just 28% the size of the old Central Library)
2. 50% affordable housing (by habitable room). (BUT none of the 3 family bed flats are affordable as policy requires.)
3. Mix of London Affordable Rent (LAR) & Discount Market Rent (DMR) held in perpetuity. (BUT just 15% of units are low cost LAR)
4. Accessible and adaptable homes (BUT blue badge provision is inadequate)
5. Replace civic offices - energy efficient (BUT Public money has been spent on a recent energy upgrade)
6. New business floorspace (BUT why is LBE providing this?)
7. Commercial/retail units (BUT existing units throughout the town centre are already vacant)
8. New jobs in construction (BUT the construction industry in London is already booming)
9. Car-free so better air quality (BUT increase in development will bring traffic servicing the new homes down residential streets to the North)
10. New public spaces, high quality design, positively enhancing the landmark, heritage Town Hall (BUT the Town Hall will be obscured by the Uxbridge Rd building line)
11. Improved public accessibility by bike or foot (BUT this is highly debatable. Opportunities for cycle routes seem to have been overlooked)
12. Can see the Town Hall from the library windows (BUT you can already see it from the street)

Major disbenefits identified by objectors

1. The development will harm the setting of Ealing Green CA, Walpole Park and in particular its grade II* listed bridge
2. The overall mass of the scheme will impose a central London scale and urban form at odds with the semi-rural character Ealing Green CA
3. The development would create a precedent for more overbearing and intrusive tall buildings in our suburban town centre and destroy its character.
4. Development will deprive hundreds of homes of their natural light
5. Affordable housing provision does not meet policy requirements which is for 50% before GLA subsidy
6. Ealing needs more family homes rather than 1 and 2 bed flats
7. Affordable units are in separate blocks creating social segregation
8. Embodied carbon will be released through the demolition of Perceval house. This is unnecessary and irresponsible
9. Tall buildings are not carbon efficient
10. Amenity and play space provision is completely inadequate. Nearby parks are already overcrowded
11. Uxbridge Rd alignment does not conform with the Local Plan's Boulevard concept
12. Increase in traffic drawn down residential streets
13. More commercial units likely to remain unoccupied. The library could make use of DY's empty space
14. Inadequate access for people with restricted mobility



HOUSING AFFORDABILITY: 3 CRUCIAL POLICY CONFLICTS

- 1. The housing size mix does not match Ealing's Strategic Housing Market Assessment (SHMA)¹**

Ealing's SHMA indicates that just under half (48%) of new homes overall (37% of affordable and 64% of market homes) should have three or more bedrooms. Despite the uplift in 3-bedroom affordable units in the Perceval House development, their share of total affordable accommodation is still only 12%, a third of what it should be. There are no larger size flats at all among the market housing.
- 2. The share of affordable housing is too low for a 'fast track' application on council-owned land**

The development uses Part C of Policy H5: Threshold approach to applications in the 2021 London Plan to avoid the onerous 'viability testing route'. Fast tracking requires schemes to deliver a the required level of affordable housing **without grant or public subsidy.** 50.5% of habitable rooms in this scheme would be affordable (the threshold for public sector land), but only **after a GLA grant.**
- 3. The rental cost of much of the 'affordable' housing would exceed local people's ability to pay**

The table overleaf shows the share of annual median² household income payable in rent split by tenure type and discount level and size of unit³. According to Shelter⁴, rent of 30% of household income counts as affordable. Anything above this is highlighted in orange in the table. For the London Borough of Ealing the equivalent percentage is 33.33%⁵ (anything above this highlighted in red). On this basis:

 - All but the most heavily discounted 3-bedroom accommodation would be unaffordable to local people on median income using either ability to pay definition. Only people from the most affluent wards (such as Northfields and Walpole) would be able to afford even the cheapest 3-bedroom flats (London Affordable Rent flats costing 35% of market rent).
 - The 1- and 2-bed flats at 66% and the 2-bed flats at 66% Discount Market Rent would be unaffordable to those on median income in over half of wards on the Council's measure. The 1-bedroom flats at 60% Discount Market Rent would also be unaffordable in two out of five wards. It should be remembered that the median is an average. The people for whom affordable housing is intended is the half of households on incomes below the average. They would be still less able to afford this accommodation than indicated by the figures shown here.

¹ Opinion Research Services, *London Borough of Ealing Strategic Housing Market Assessment Update: Report of Findings*, October 2018

² The 'median' is the middle value in a list of numbers (here household income) ordered from smallest to largest.

³ In the absence of formal viability information (not required for a 'fast track' application), our analysis is based on the following assumptions:

- Annual median household income is for the year 2018. We have calculated rental costs based on the annual median household income for the three closest wards to the site (Ealing Broadway, Walpole and Cleveland) and for the wards with the highest (Northfields) and the lowest annual median household income in the borough (Northolt West End).
- Market rent information is based on the annualised cost of a 1-, 2- or 3-bedroom flat in Dickens Yard at w/commencing 8 February 2021 (based on an internet search). These costs are shown below and include service charge and ground rent.
 - 1-bedroom: £19,764 per annum
 - 2-bedroom: £22,884 per annum
 - 3-bedroom: £41,604 per annum
- The tables apply the range of discounts shown in the planning application to the market rents above and display them as a percentage of median household income.
 - London Affordable Rent (35%)
 - London Affordable Rent (45%)
 - Discounted Market Rent (60%)
 - Discounted Market Rent (66%)
 - Discounted Market Rent (80%)

⁴ Shelter, *A Vision for Social Housing: the final report of Shelter's commission on the future of social housing*, Date not provided (post-Grenfell)

⁵ London Borough of Ealing, *Scrutiny Review Panel 1 – 2018/19: Housing and Planning, Panel's Report*

PERCEVAL HOUSE: HOUSING AFFORDABILITY BASED ON RENTAL SHARE OF ANNUAL MEDIAN HOUSEHOLD INCOME

Ward	Annual median household income 2018(£)	Annual cost of London Affordable Rent*					
		35% of Market Rent (£)			45% of Market Rent (£)		
		1 bed	2 bed	3 bed	1 bed	2 bed	3 bed
		6917	8009	14561	8894	10298	18722
		As % of annual median household income					
		1 bed	2 bed	3 bed	1 bed	2 bed	3 bed
Northfields	52642	13	15	28	17	20	36
Walpole	49680	14	16	29	18	21	38
Ealing Broadway	47130	15	17	31	19	22	40
Cleveland	43169	16	19	34	21	24	43
Northolt West End	25493	27	31	57	35	40	73
		Annual cost of Discounted Market Rent*					
		60% of Market Rent (£)			66% of Market Rent (£)		
		1 bed	2 bed	3 bed	1 bed	2 bed	3 bed
		11,858	13730	24962	13044	15103	27458
		As % of annual median household income					
		1 bed	2 bed	3 bed	1 bed	2 bed	3 bed
Northfields	52642	23	26	47	25	29	52
Walpole	49680	24	28	50	26	30	55
Ealing Broadway	47130	25	29	53	28	32	58
Cleveland	43169	27	32	58	30	35	64
Northolt West End	25493	47	54	98	51	59	108
		Annual cost of Discounted Market Rent			Annual cost of Market Rent*		
		80% of Market Rent (£)			100% of Market Rent		
		1 bed	2 bed	3 bed	1 bed	2 bed	3 bed
		15811	18307	33283	19764	22884	41604
		As % of annual median household income					
		1 bed	2 bed	3 bed	1 bed	2 bed	3 bed
Northfields	52642	30	35	63	38	43	79
Walpole ward	49680	32	37	67	40	46	84
Ealing Broadway	47130	34	39	71	42	49	88
Cleveland ward	43169	37	42	77	46	53	96
Northolt West End w	25493	62	72	131	78	90	163

* Based on Dickens Yard (Central Ealing) rents w/commencing 8 February 2021. Includes service charges and ground rent

Rent is unaffordable based on Shelter definition (more than 30% of income)

Rent is unaffordable based on LBE definition (more than 33.33% of income)