

From: Pre-applications
Sent: 13 February 2024 08:32
To: [REDACTED] re-applications
Subject: RE: Proposed Date for Level 1 Pre-application Meeting Gurnell Leisure Centre

Follow Up Flag: Follow up
Flag Status: Completed

Hi [REDACTED]

Thank you for confirming.

[REDACTED] will look forward to meeting you tomorrow.

Kind regards
[REDACTED]

Planning Support Administrator, Planning
GREATERLONDONAUTHORITY
Union Street, London SE1 0LL
[REDACTED]

london.gov.uk

[\[REDACTED\]@london.gov.uk](mailto:[REDACTED]@london.gov.uk)

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From: [REDACTED]@tubbalds.co.uk>
Sent: Monday, February 12, 2024 5:08 PM
To: Pre-applications <Pre-applications@london.gov.uk>
Subject: Re: Proposed Date for Level 1 Pre-application Meeting Gurnell Leisure Centre

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Hi [REDACTED]

Thanks for letting me know. We would still like to go ahead with the meeting please.

Regards

[REDACTED]
Associate
For Tibbalds Planning and Urban Design Ltd

D [REDACTED] 3
T [REDACTED]

Email: [REDACTED] [tibbalds.co.uk](mailto:[REDACTED]@tibbalds.co.uk)
Address: 30 King's Bench Street, London, SE1 0QX
Web: www.tibbalds.co.uk
Twitter: [@Tibbalds](https://twitter.com/Tibbalds)
Instagram: [Tibbalds](https://www.instagram.com/Tibbalds)

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On Mon, 12 Feb 2024 at 15:30, Pre-applications <Pre-applications@london.gov.uk> wrote:

Good afternoon [REDACTED]

Hope you're well.

I am getting in touch with you regarding your upcoming Level 1 pre-application meeting on Wednesday. I've been informed that John Finlayson will no longer be available to attend on this date. The case officer, [REDACTED] [REDACTED] is fairly familiar with this site and the history and he is happy to carry on with the scheduled meeting without John.

Therefore we would like to know what would you prefer. Either to carry on with the scheduled meeting without [REDACTED] or we can reschedule the meeting when [REDACTED] is also available.

Please let me know how would you prefer to proceed.

Apologies for any inconveniences.

Kind regards

[REDACTED]

[REDACTED] [REDACTED]

Planning Support Administrator, Planning

GREATERLONDONAUTHORITY
Union Street, London SE1 0LL

[REDACTED]

london.gov.uk

[REDACTED] london.gov.uk

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From: Pre-applications <Pre-applications@london.gov.uk>

Sent: Wednesday, February 7, 2024 2:32 PM

To: [REDACTED] [REDACTED] <[\[REDACTED\]@tibbon.co.uk](mailto:[REDACTED]@tibbon.co.uk)>; Pre-applications <Pre-applications@london.gov.uk>

Subject: RE: Proposed Date for Level 1 Pre-application Meeting Gurnell Leisure Centre

Hi [REDACTED]

Thank you for confirming the date.

I will send you the updated invite and confirmation email shortly.

Thank you for letting us know, that the LPA will be also attending. That's not a problem at all.

Kind regards

[REDACTED]

[REDACTED] [REDACTED]

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From: [REDACTED] <[\[REDACTED\]@tibbon.co.uk](mailto:[REDACTED]@tibbon.co.uk)>
Sent: Monday, February 5, 2024 4:56 PM
To: Pre-applications <Pre-applications@london.gov.uk>
Subject: Re: Proposed Date for Level 1 Pre-application Meeting Gurnell Leisure Centre

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Hello,

Thank you for checking. I think it's best that we go with the 14th February date. Will this be on Teams? I know this is limited to 3 people from the applicant team but in addition to this can we invite our planning case officer at Ealing Council as well? He would like to join.

Thank you

Regards

██████████ ██████████
Associate

For Tibbalds Planning and Urban Design Ltd

Direct dial: 020 ██████████

Tel: 020 7089 ██████████

Email: ██████████ [tibbalds.co.uk](mailto:██████████@tibbalds.co.uk)

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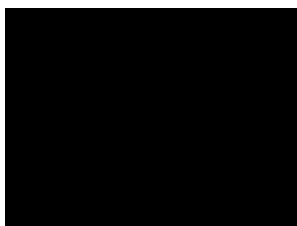
On Fri, 2 Feb 2024 at 14:42, Pre-applications <Pre-applications@london.gov.uk> wrote:

Hello ██████████

Thank you for your email.

Unfortunately we don't have the availability on the dates you're proposing. I can look for more availability on the w/c 19th February, if the 14th isn't suitable for you.

Kind regards

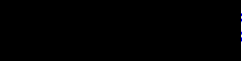


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From: @tibbalds.co.uk>

Sent: Thursday, February 1, 2024 10:43 AM

To: Pre-applications <Pre-applications@london.gov.uk>

Subject: Re: Proposed Date for Level 1 Pre-application Meeting Gurnell Leisure Centre

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Hello,

Apologies for the delayed response [REDACTED]. Thank you for checking alternative dates. Can I just check if you have availability on Monday 12th February (PM) or Tuesday 13th February (AM) by any chance? If not, I will discuss with my Director and see what we can do.

Thank you

Regards

[REDACTED] [REDACTED]

Associate

For Tibbalds Planning and Urban Design Ltd

Direct dial: 020 [REDACTED]

Tel: 020 7089 [REDACTED]

Email: [REDACTED] [tibbalds.co.uk](mailto:[REDACTED]@tibbalds.co.uk)

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Web: www.tibbalds.co.uk

Twitter: [@Tibbalds](https://twitter.com/Tibbalds)

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On Tue, 30 Jan 2024 at 16:09, Pre-applications <Pre-applications@london.gov.uk> wrote:

Dear [REDACTED]

Thank you for your email.

Would 14th February at 2-3pm suits you better?

Alternatively I can have a look for availability in w/c 19th February.

Kind regards

[REDACTED]

[REDACTED] [REDACTED]

Planning Support Administrator, Planning

GREATERLONDONAUTHORITY
Union Street, London SE1 0LL

[REDACTED]

[london.gov.uk](https://www.london.gov.uk)

Zuzana.jancova@london.gov.uk

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From: [REDACTED] <[\[REDACTED\]@tibbalds.co.uk](mailto:[REDACTED]@tibbalds.co.uk)>
Sent: Monday, January 29, 2024 5:28 PM
To: Pre-applications <Pre-applications@london.gov.uk>
Subject: Re: Proposed Date for Level 1 Pre-application Meeting Gurnell Leisure Centre

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Dear [REDACTED]

Thanks very much for coming back to me with dates for our first GLA meeting. Unfortunately my [REDACTED]
[REDACTED] who will need to attend. Do you have any availability earlier that week or w/c 5th Feb?

Thank you

Regards

[REDACTED]
Associate

For Tibbalds Planning and Urban Design Ltd

Address: 30 King's Bench Street, London, SE1 0QX

Web: www.tibbalds.co.uk

Twitter: [@Tibbalds](https://twitter.com/Tibbalds)

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On Mon, 29 Jan 2024 at 13:47, Pre-Applications <pre-applications@london.gov.uk> wrote:

Dear [REDACTED]

GLA reference number: 2024/0048/P1

Site name: Gurnell Leisure Centre

Address: Gurnell Leisure Centre, Ruislip Road East, London, W13 0AA

Local Planning Authority: Ealing

Proposal: Redevelopment of the Gurnell Leisure Centre to provide a new leisure centre with enabling housing development, landscaping and parkland improvements.

On 24/01/2024 the GLA Development Management Team received your request for a Level 1 meeting for the above pre-planning application proposal. The case officers assigned to this case are [REDACTED] [REDACTED] and John Finlayson.

Meeting format

The meeting will last around 45 minutes and be attended by at least one senior manager from the GLA's Planning Team. TfL and GLA energy, viability or design officers will not attend or provide comments on submitted material.

No more than 3 people should attend from the applicant's side to allow the discussion to focus on the key planning principles the proposals would raise.

An electronic copy of the scheme should be submitted with the meeting request; and an electronic copy of any additional material presented at the meeting should be sent to the case officer.

Please note that Level 1 pre-application "in principle" meetings are intended to discuss key planning principles only and a detailed design document should not be presented. If the scheme is at a detailed design stage then a Level 2 pre-application meeting may be more appropriate. These meetings should not be seen as an alternative to (Level 2) pre-application advice meetings, where detailed GLA and TfL officer advice on the full range of matters any subsequent planning application would need to address is offered.

We can only comment on information provided in advance of the meeting. Where we have no or limited information we will not be able to provide a comprehensive assessment. The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

The advice response you will receive will only address issues that you have sent documentation on. A meeting note will be sent to you two working days prior to the meeting which will outline the issues that will be discussed.

Cancellation

If, due to circumstances out of our control, we cancel the meeting we will reschedule for another time as soon as practical. Meetings can be rescheduled at your request up to 48 hours prior to the date agreed. The fee is non-refundable on cancellation.

Proposed meeting date

We can offer a tentative date and time of **16/02/2024 at 11:00 - 12:00.**

Please let us know if this is acceptable and who will be attending.

Regards



Planning Support Team

Greater London Authority

pre-applications@london.gov.uk

]]>

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The GLA stands against racism. Black Lives Matter.

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The GLA stands against racism. Black Lives Matter.

14 February 2024 14:00-15:00

Dear all,

This meeting has been confirmed by the agent. Please contact your case officer, [REDACTED], if you have any queries.

GLA reference number: 2024/0048/P1

Site name: Gurnell Leisure Centre

Address: Gurnell Leisure Centre, Ruislip Road East, London, W13 0AA

Local Planning Authority: Ealing

Proposal: Redevelopment of the Gurnell Leisure Centre to provide a new leisure centre with enabling housing development, landscaping and parkland improvements.

Case officer: [REDACTED]

Gurnell Leisure Centre

in the London Borough of Ealing

The proposal

Redevelopment to provide a new leisure centre with enabling housing development and parkland improvements.

The applicant

The applicant is **London Borough of Ealing**.

Level 1 pre-app meeting

An 'in principle' pre-application meeting took place on **14 February 2024**.

Meeting attendees

- GLA
[REDACTED] Team Leader – Development Management
- Applicant team
 - [REDACTED] – Ealing Council
 - [REDACTED] – Mikhail Riches
 - [REDACTED] [REDACTED] - Tibbalds
- Local Planning Authority
 - [REDACTED] – Ealing Council

1 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application. The applicant is strongly encouraged to pursue Level 2 GLA pre-application advice in order to receive more in-depth advice across the full breadth of strategic issues that the Mayor would consider. Further information of the GLA pre-application service is available on the City Hall website at: www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service.

Summary of meeting discussions

2 The applicant team outlined the site, setting and local planning context. It was noted that the site is Metropolitan Open Land and forms part of a wide swathe of green open space running along the Brent River Valley from the Western Avenue near Hanger Lane to the Uxbridge Road in Hanwell and beyond. It was also noted that the existing leisure centre is currently closed and unusable in its current condition.

3 The applicant summarised previous (refused) proposals at this site for a new leisure centre and 599 units of enabling housing, in buildings of up to 17-storeys.

4 The applicant team went on to outline new proposals for redevelopment to provide a replacement leisure centre with enabling housing development (approximately 300 homes in buildings of up to 10-storeys) as well as wider landscaping and parkland improvements.

Land use principles

Metropolitan Open Land

5 Whilst the site is, in part, previously developed land (including the existing leisure centre building and hard-surfaced car park) the Local Plan designates this site as Metropolitan Open Land (MOL) in its entirety. The London Plan affords MOL the same protection as Green Belt. Based on the information presented GLA officers are of the opinion that the proposal would constitute “inappropriate development” as defined by the National Planning Policy Framework (NPPF). Therefore, for the proposal to be acceptable in planning terms, very special circumstances must be demonstrated that would outweigh the associated harm to MOL.

6 It is also worthy of note that the draft Local Plan envisages the potential for leisure-led redevelopment at this site, supported by enabling residential development where this would make a meaningful contribution to delivery of a new leisure centre.

7 Having regard to the existing and emerging policy context, as well as the planning history at this site, GLA officers support the principle of a replacement leisure centre development with enabling housing - where the public benefits of this would amount to very special circumstances that could outweigh the associated harm to MOL.

8 In general it is noted that the proposed ‘enabling’ residential development is focused on the previously developed part of the site, and has been reduced in quantum and scale from that of the previous (refused) proposal. It is also noted that a revised layout of residential blocks has been proposed which offers greater potential for views across the MOL from Ruislip Road East. These changes are welcomed, and are likely to result in a reduced extent of harm to MOL compared to the previous (refused) proposal.

9 Nevertheless, the harm to MOL associated with the proposal will be significant, and substantial weight must be given to this harm in accordance with the NPPF. Accordingly, it is critical that the applicant develops a package of public benefits that would amount to very special circumstances. Such benefits are likely to be associated with the new leisure centre, parkland enhancements and affordable housing. The applicant is strongly encouraged to engage in a level 2 GLA pre-application meeting to discuss this (and other strategic matters) before an application is submitted.

for further information, contact GLA Planning Unit (Development Management Team):

Lucinda Turner, Assistant Director - Planning

email [REDACTED]r@london.gov.uk

John Finlayson, Head of Development Management

email [REDACTED]@london.gov.uk

[REDACTED] Deputy Head of Development Management

email [REDACTED]@london.gov.uk

[REDACTED] Team Leader – Development Management

email [REDACTED]london.gov.uk

GREATER **LONDON** AUTHORITY

Good Growth

Our ref: 2024/0106/P2I

Date: 19 April 2024

By email

Dear 

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

**Site: Gurnell Leisure Centre, Ruislip Road East, London, W13 0AA
London Borough of Ealing**

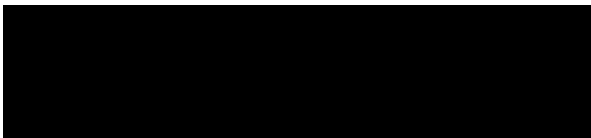
LPA: Ealing

Our reference: 2024/0106/P2I

Further to the pre-planning application meeting held on 28 March 2024, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Yours sincerely



John Finlayson

Head of Development Management

cc , Deputy Head of Development Management

TfL

Gurnell Leisure Centre

Local Planning Authority: Ealing

The proposal

Demolition of the existing Gurnell Leisure Centre and construction of replacement centre, with enabling residential development (ca. 300 units, 35% AH), as well as landscaping and parkland improvements.

The applicant

The applicant is **London Borough of Ealing**.
The architects are **Mikhail Riches, GT3 Architects and Periscope**.

Assessment summary

A replacement leisure centre is strongly supported in principle and the proposed land uses could be acceptable, subject to the applicant successfully minimising the harm to MOL openness and any other harm arising from the application while robustly demonstrating and strengthening all other public benefits.

Nonetheless, further discussions are required on the proposed FVA methodology in order to reach an agreed position. In addition, further information will be required in relation to the VSC case.

The future application will also need to address the comments made in this report and associated technical comments with respect to design, heritage and environment.

Follow up meetings

Follow up meetings are recommended to further discuss viability, design and the VSC case, and environmental matters.

Context

1. On 28 March 2024, a pre-planning application meeting to discuss a proposal to develop the above site for the above uses was held on MS Teams with the following attendees:

GLA group

- [REDACTED] GLA Case officer
- [REDACTED] Team leader (DM)
- [REDACTED] Urban Design officer
- [REDACTED] Viability officer
- [REDACTED] Energy officer
- [REDACTED] Circular economy officer
- [REDACTED] Whole life-cycle carbon officer

Local Authority

- [REDACTED] Case Officer

Applicant

- [REDACTED] LB Ealing (Applicant)
- [REDACTED] Mikhail Riches
- [REDACTED] GT3 Architects
- [REDACTED] GT3 Architects
- [REDACTED] Periscope
- [REDACTED] Expedition/ Useful Projects
- [REDACTED] Expedition/ Useful Projects
- [REDACTED] Savills
- [REDACTED] Tibbalds Planning and Urban Design
- [REDACTED] Tibbalds Planning and Urban Design

2. The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application.

Site description

3. The site covers an area of 13.2 hectare and is located in the Brent River Park within designated Metropolitan Open Land (MOL). The site is bound by Stockdove Way to its north, Ruislip Road East to its south, Argyle Road to its

east and an off-road shared pedestrian/cycle path to its west (linking Stockdove Way to Ruislip Road East).

4. The site comprises the two-storey Gurnell Leisure Centre and its associated surface car park, with open parkland and playing fields to the north-east and north-west.
5. The Gurnell Leisure Centre is owned by Ealing Council and is one of only four indoor 50 metre swimming pools in London, though it has been closed since March 2020. The existing pool has six lanes with a movable divider to split the pool in two. The leisure centre also includes a recreation/fun pool, spectator seating, a gym and exercise studios, changing rooms, staff facilities and a small retail unit.
6. The open space includes a number of sporting and recreational facilities including a children's adventure playground, a skate park, BMX track, playing fields used for football and cricket and areas of open grassland and tree belts. This expansive area of open and undeveloped land is approximately 10.5 hectares in size. This part of the Brent Valley includes a number of other recreational and sporting facilities, including the nearby Perivale Athletics Track. Collectively, these sporting facilities perform a function, which is of considerable significance within the west London sub-region.
7. In terms of the surrounding context, Peal Gardens immediately to the east comprises two and three-storey residential properties. An isolated pair of unlisted Victorian semi-detached properties are found to the south-west of the Leisure Centre on Ruislip Road East. There is a more varied context to the south which comprises a mix of two-storey semi-detached and terraced houses as well as the Gurnell Grove Estate which includes a mix of linear blocks ranging in height from 3, 4 and 5 storeys, with three 11-storey towers. The residential context to the north of the site comprises two and three-storey suburban houses.
8. The site is in the setting of the following designated heritage assets:
 - Church of St Mary the Virgin, listed Grade I and associated Lych Gate and Colleton Tomb, listed Grade II;
 - Hanwell Community Centre, listed Grade II;
 - The Kent Hotel, listed Grade II;
 - Cuckoo Estate Conservation Area.
9. The site is also in Flood Zone 3 and lies partially within the Brent River Park North: Hanger Lane to the Great Western Railway Site of Importance for Nature Conservation (SINC), which is classified as Borough grade I importance.
10. Most of the site has a Public Transport Access Level (PTAL) ranging between 2 and 3, on a scale of 0 to 6b, where 6b represents the highest level of connectivity to the public transport network. There are no rail stations accounted for in the PTAL of the site, due to them falling outside the analysed distance. However, it is noted that South Greenford rail and Perivale LUL stations are both within 20-minute walk to the north of the site, and West Ealing station, which serves the Elizabeth Line, is approximately 25-minute walk to the south of the site.

11. The nearest part of the Transport for London Road Network (TLRN) is A40 (Western Avenue), approximately 800m to the north of the site (measured from the access in Ruislip Road East). The nearest part of the Strategic Road Network (SRN) is Greenford Road (A4127), approximately 1.6m east of the site.

Details of this proposal

12. Demolition of the existing Gurnell Leisure Centre and construction of replacement centre, with enabling residential development (ca. 300 units, 35% AH) up to 50m in height, as well as landscaping and parkland improvements.
13. The future application is expected to be referable to the Mayor under the following categories of the Mayor of London Order 2008:
- *Category 1A: "Development which comprises or includes the provision of more than 150 houses, flats, or houses and flats."*
 - *Category 1B(c): "Development (other than development which only comprises the provision of houses, flats, or houses and flats) which comprises or includes the erection of a building or buildings - outside Central London and with a total floorspace of more than 15,000 square metres."*
 - *Category 1C: "Development which comprises or includes the erection of a building of...more than 30 metres high and is outside the City of London."*
 - *Category 3D: Development (a) on land allocated as Green Belt or Metropolitan Open Land in the development plan, in proposals for such a plan, or in proposals for the alteration or replacement of such a plan; and (b) which would involve the construction of a building with a floorspace of more than 1,000 square metres or a material change in the use of such a building.*

Strategic planning issues and relevant policies and guidance

14. For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area comprises the Ealing Development (Core) Strategy (2012); Development Sites DPD (2013); Development Management DPD (2013); Adopted Policies Map (2013); Planning for Schools DPD (2016); Joint West London Waste Plan (2015); and, the London Plan 2021.
15. The following are relevant material considerations:
- The National Planning Policy Framework and National Planning Practice Guidance;
 - Ealing's Local Plan - Final Proposals (Regulation 19).
16. The relevant issues, corresponding strategic policies and guidance (supplementary planning guidance (SPG) and London Plan guidance (LPG)), are as follows:
- MOL *London Plan*;

- Social infrastructure *London Plan; Social Infrastructure SPG; the Mayor's Strategy for Equality, Diversity and Inclusion; Planning for Equality and Diversity in London SPG;*
- Housing and affordable *London Plan; Housing SPG; the Mayor's Housing Strategy; Affordable Housing and Viability SPG; Affordable Housing draft LPG; Development Viability draft LPG;*
- Design *London Plan; Character and Context SPG; Public London Charter LPG; Characterisation and Growth Strategy LPG; Optimising Site Capacity: A Design-Led Approach LPG; Housing SPG; Play and Informal Recreation SPG; Housing Design Standards LPG; Accessible London: achieving an inclusive environment SPG; Public London Charter LPG; Fire safety draft LPG;*
- Heritage *London Plan;*
- Environment *London Plan; Circular Economy Statements LPG; Whole-life Carbon Assessments LPG; 'Be Seen' Energy Monitoring Guidance LPG; Energy Planning Guidance; London Environment Strategy; Control of dust and emissions during construction and demolition SPG; Air quality positive draft LPG; Air quality neutral draft LPG; Urban greening factor draft LPG;*

Case history

17. In 2020, a planning application seeking the redevelopment of the same site was submitted for buildings up to 17 storeys in height comprising: 12,955 sqm of leisure centre; 599 residential units (35% affordable, split 50% London Affordable Rent and 50% London Shared Ownership); 480 sqm of flexible commercial floorspace; improvements to open space, recreational and outdoor sports and play space facilities.
18. This application was recommended for approval by Ealing officers, but was overturned by the Planning Committee, which concluded that the harm caused by the proposals to MOL openness would not be clearly outweighed by the proposed public benefits.

Summary of meeting discussion

19. Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to land use principles and equalities, affordable housing and viability, design and heritage, as well as energy, whole life-cycle carbon and circular economy. Issues with

respect to green infrastructure and water were not discussed in detail at this stage. Based on the information made available to date, GLA officer advice on these issues is set out within the sections that follow.

Land use principles

20. London Plan Policy G3 affords to MOL the same level of protection as Green Belt. The proposed construction of new residential buildings and of a replacement leisure centre on MOL through a building that is materially larger than the one it replaces would constitute inappropriate development. Therefore, it should not be approved unless the harm to MOL by reason of inappropriateness (to be given substantial weight), and any other harm, is clearly outweighed by other considerations, namely, Very Special Circumstances.
21. Notwithstanding the above, it is considered that the proposed replacement and enhancement for outdoor sport and recreation facilities preserving MOL openness would instead constitute appropriate development and would therefore be supported, also in line with London Plan Policy S5.
22. Accordingly, the assessment of the harm to MOL openness caused by the proposed buildings and the proposed Very Special Circumstances are presented in the sections below.

Harm to openness

23. As noted in the NPPG, openness is capable of having both spatial and visual aspects, which will be assessed in full at application stage.

Spatial impact

24. It is understood from the previous application that the existing building footprint is 3,919 sqm, the developed land is 14,215 sqm and the existing building height is 2 storeys.
25. The future submission should confirm the above-mentioned and also contain the following figures:
 - Existing building heights (metres);
 - Proposed building footprint (sqm) GEA;
 - Proposed developed land (sqm) GEA;
 - Proposed building heights (metres and storeys).
26. At this stage, it is welcome that the applicant sought to locate the residential development over the car park, thus minimising the increase in developed land.

Visual impact

27. Whilst verified views will be needed to fully assess the proposals' visual impacts on MOL openness, it is clear at this stage that the tallest residential blocks would be placed towards north, facing the undeveloped section of the MOL, and this will have a considerable visual impact on the MOL openness (as demonstrated in the view looking towards the skate park). Significant

consideration should be given to vegetation, in order to screen and soften the appearance of the proposed buildings.

28. A clearer comparison between the existing and proposed leisure centre will also be needed, in order to confirm the impacts arising from this element of the proposals, though it is noted that they will be less significant than those of the new residential element.

Very special circumstances (VSC)

29. From the previous planning application submission and the current pre-app information, it is expected that the following factors will be considered as VSC.

Lack of alternative sites

30. It is understood from the previous application that a detailed alternative site assessment was previously produced and this was considered to satisfactorily demonstrate that there are not any available and more suitable Council-owned sites (or combination of sites), which could accommodate the proposed development. The site assessment should be included in the future submission to continue to form part of the VSC.

Community benefits associated with the new leisure centre provision

31. It is understood that the existing leisure centre closed in March 2020 and that the proposals would provide a new, enhanced leisure centre, comprising also new indoor sporting facilities. Updated details about the financial circumstances of the existing and proposed leisure centres, the extent of the improvements to the indoor facilities and the proposed affordability details, should be adequately presented in the future submission.

Community benefits associated with the new outdoor sport and recreation provision

32. It appears that the existing play area, outdoor gym and skatepark and bowl would be re-provided and that the existing BMX track would be replaced with a pump track. Furthermore, a seating slope would be introduced, while the playing fields would be removed from the site, as part of the Council's Playing Pitch Strategy (which includes relocation to Perivale Park and enhanced playing pitch capacity at Gunnersbury Park and William Perkin School).
33. This would be acceptable, however, clarification will need to be provided in the future submission to clarify the extent of enhancement of the proposals over the existing outdoor sport and recreation provision.

Environmental enhancements

34. The submitted pre-app information states that the scheme will deliver ecological and biodiversity enhancements. Adequate technical information will need to be included in the future submission.

Conclusion

35. A replacement leisure centre is strongly supported in principle and the proposed land uses could be acceptable, subject to the applicant successfully minimising the harm to MOL openness and any other harm arising from the

application while robustly demonstrating and strengthening all other public benefits (which will need to be suitably secured as part of any permission).

Housing

Affordable housing

36. The application site is public land, owned by Ealing Council. Accordingly, the Fast Track threshold for the application would be 50%. The applicant is proposing 35% and, as such, the scheme will need to follow the Viability Tested Route. Affordability details, early and late stage review will need to be secured as part of any permission.
37. The applicant has submitted a Briefing Note prepared by Savills. Savills carried out a high level assessment of the viability of the residential element of the scheme, assuming a range of affordable housing levels (50%, 35% and 20% - with a tenure split of 60% social rent and 40% shared ownership housing). Scenarios which assumed grant for all units above 20% had also been tested for the 50% and 35% options.
38. The appraisals were not provided for review, but Savills reported residual land value outcomes of between a negative land value of £14.8m (for the 50% no grant scenario) to a positive land value of £1.4m (for the 20% no grant scenario). The scenario with 35% affordable housing and grant of £6m produced a nominal land value.
39. The approach suggested for establishing a Benchmark Land Value (BLV) based on the receipt required by the Council to fund the leisure centre element of the scheme is not considered acceptable. The price paid cannot be used as the BLV and neither can the landowner's requirements in terms of a receipt for the land. This would be contrary to National and Mayoral guidance, which requires BLV to be based on existing use value (EUV).
40. In this case, the EUV may be nil based on the existing disused leisure centre building. Any alternative uses used to inform BLV should be fully evidenced with detailed plans and costing, evidence of the demand for the use and confirmation that the LPA would be likely to grant consent for that use.
41. It is not clear why the planning application as a whole is not included in the viability assessment. This was the approach taken on this site previously during the assessment of the previous application and GLA officers consider that it should be used again. The cost of building the new leisure centre should be included alongside the value (estimated at £20m) and any borough's funding for the new facility.
42. With respect to phasing, it is noted that the S106 agreement will be required to include provisions to ensure timely delivery of the leisure centre (for example, by restricting commencement of an element of the residential market units). The detail of the mechanism in this regard will need to be further discussed and agreed accordingly.

Design

Design scrutiny

43. As discussed further below, the proposals would comprise tall buildings and, as such, must undergo at least one design review early on in their preparation before a planning application is made. It is welcome that the scheme has already undergone one Design Review Panel, however, it is noted that the Panel's comments have not been yet addressed and they should be responded to prior to submission. The applicant is furthermore encouraged to present the proposals again to the Design Review Panel once they are further developed.

Development layout

44. The overall principles of the proposed layout are considered broadly positive with the arrangement driven by the site's sustainability credentials and flood mitigation methods. Nonetheless, there are a number of aspects currently raising concern and requiring further consideration.
45. With regards to the leisure centre, whilst it is understood that the internal layout is based on the passive design and approach to its internal heat, GLA officers would strongly encourage that the relationship of the leisure centre to Ruislip Road East is reconsidered, as also recommended by the Design Review Panel.
46. The applicant should review the proposed design to ensure that the centre's entrance is clearly legible and the building positively addresses the road, connecting with its surroundings. Special consideration should also be given around the bus stop area, which feels separated and exposed, lacking overlooking and active frontages for a sense of safety.
47. With regards to the residential element, the minimum distancing between Parcel A and B of 12m is considered narrow and the applicant is therefore strongly advised to increase it. The proposed 12m would limit what could be achieved in terms of public realm quality between buildings, particularly as there is a vehicle route central to the space. There are also concerns regarding potential overlooking and that it would not provide the generous room needed to allow trees to mature.
48. No. 80 Ruislip Road East is considered to be extremely isolated and GLA officers would recommend that the development improves the relationship between this residential dwelling and the leisure centre, becoming a considerate and good neighbour.
49. The outdoor gym location, which sits furthest away from the development, hidden further by the undulating landscape, is considered to lack passive surveillance and a sense of safety. Whilst it is noted that this choice was driven by the community panels, particularly women, who did not want to be overlooked when exercising, GLA officers would strongly recommend that the applicant explores ways for improving safety here.
50. GLA officers would also encourage additional access in and out of all the cycle hubs and refuse storage to increase usability and the sense of safety in these isolated locations, particularly for women and gender-diverse people.

Visibility into the cycle spaces should also be considered wherever possible, rather than enclosing them as rooms. Please, refer to the guidance 'Safety in Public Space, Women Girls and Gender Diverse People' by the GLA.

Landscape and public realm

51. The approach to the landscaping is welcome, as it is being led by the flood zones and character of the MOL. Nonetheless, it is noted that many it is proposed to remove many trees, though the rationale is unclear, as some of the trees do not sit within the building footprints. Clarification in this respect should therefore be provided.
52. The external parking being created for the leisure centre would benefit from working with the landscape rather than replicating the design already existing on the site. Trees and other methods of planting should be incorporated to help blend the proposed parking into the landscape.
53. One of the key moves for the residential is to increase the openness of the MOL through the site. GLA officers welcome further improvement and greening of the loop road which travels through the residential element. It is considered that the east/west route is significantly lacking in urban greening and that parking spaces should be broken up with trees to minimise their impact on views of the MOL.

Height, massing and architecture

54. It is noted that the proposals include buildings up to 52.5m, which would meet the tall building definitions of both the adopted Local Plan, as substantially taller than its neighbours, and of the emerging Local Plan, as higher than the local threshold of 21m. Neither the adopted nor the emerging Local Plan identify the site as suitable for tall buildings. The proposals would therefore conflict with London Plan D9(B3).
55. The future submission should take into account the impact on MOL openness and should ensure that the proposals' visual, functional environmental and cumulative impacts are suitably addressed.
56. The overall principle of locating the taller elements to the north of the site is supported, noting it is taking into consideration daylight/sunlight and microclimate. GLA officers would welcome the inclusion of an External Transient Overshadowing Study to help demonstrate the developments' impact on the MOL and new residential open space and public realm.
57. In addition, it is considered that the applicant should provide a clear demonstration of how the tallest proposed residential building in the northwest corner would be mitigated, as it currently lacks significant planting/trees around the base and appears exposed, resulting in negative impacts on the openness of MOL in this location, particularly when viewed from within the MOL looking south.
58. With regards to architecture and materiality, the approach being considered for the design code, although not completed, appears positive. Nonetheless, it is considered that the leisure centre needs further improvement considering its views from the MOL looking south. The current approach feels cluttered and needs to be more considerate. It is considered that the building should

better blend with the landscape and significant improvement to the approach of rooftop/back of house elements is also needed.

Fire safety

59. In accordance with the London Plan Policy D12 on fire safety, the applicant should submit with the future planning application a fire statement, produced by a third party suitable qualified assessor. The assessor's experience and qualifications must be clarified within the statement.
60. The statement should clearly confirm how it addresses the requirements of Policy D12(B,1-6). All information should be specific and relevant to the development proposal, including through the use of site and floor plans, and it should demonstrate which fire safety regulations, standards, design codes and best practice the development has been designed to.
61. Following the amendments to approved document B, two staircases should be provided for buildings above 30m, unless the scheme was to follow the Government's proposed transitional arrangements (set out in its 24 October 2023 [Written Ministerial Statement](https://questions-statements.parliament.uk/written-statements/detail/2023-10-24/hcws1090)¹).
62. As per London Plan Policy D5(B5), in developments with lifts, as a minimum, at least one lift per core (or more subject to capacity assessments) should be suitably sized fire evacuation lifts capable of evacuating people who require level access from the buildings. This provision should be clearly shown on the proposed plans, which should be included in the fire statement for ease of reference. In addition, the submitted fire statement should include an outline evacuation strategy and an outline management plan (including how the evacuation lifts will be operated).
63. The statement must contain a clear and unambiguous declaration of compliance by the qualified assessor stating that the fire safety information submitted with the application satisfies the requirements of London Plan Policy D12 and D5(B5).

Residential Quality

64. Whilst the overall summary being considered for the residential element of the scheme was not very detailed, the overall approach presented to maximise dual-aspect units, provide front doors on the street to create active frontages, create low-energy homes and maximise daylight into the MOL is supported. This should be robustly secured in the final design code. In addition, further work should ensure that adequate internal daylight/sunlight is achieved, and sufficient private amenity space is created, meeting London Plan Policy D6 and having regards to the Housing Design Standards LPG.

Children's play space

65. The future submission should confirm that good-quality, accessible play provision for all ages, of at least 10 sqm per child that is not segregated by tenure, will be included in the proposals, in line with London Plan Policy S4.

¹ <https://questions-statements.parliament.uk/written-statements/detail/2023-10-24/hcws1090>

Accessible housing

66. The future submission should confirm that at least 10% of the proposed residential units would meet Building Regulation requirement M4(3), with the remaining units meeting the requirement of M4(2), as required by London Plan Policy D7.

Inclusive design and equalities

67. The proposals should achieve the highest standard of inclusive design facilitating social interaction and inclusion, in line with London Plan Policy D5.
68. It is also noted that Policy D5 and paragraph 3.5.3 of the London Plan require all proposals to submit an inclusive design statement, proportionate to the scale and type of development, which should (among other things) detail engagement with relevant user groups, such as disabled or older people's organisations, or other equality groups and show that the potential impacts of the proposal on people and communities who share a protected characteristic and who will be affected by it have been considered.
69. Adequate information in line with Policy D5 should be submitted in the future application to enable the GLA to fulfil its Public Sector Equality Duty (in whichever format is more practical for the applicant, as either part of the Inclusive Design Statement or, if the Council is already preparing an EqlA to fulfil its duty, as a standalone document).
70. It is noted that the leisure centre has already stopped operating, which partly limits the equality implications arising from the current scheme. However, it appears that a number of sporting facilities on site are currently in use, so consideration will need to be given to interim arrangements to avoid or minimise negative impacts on protected groups. In addition, consideration may need to be given to the permanent impacts of the proposals post-completion wherever appropriate.
71. Furthermore, it is noted that in the previous application some objections were raised in relation to equality matters (like impact on BAME and young people). Engagement with the local community will be fundamental to understand potential equality impacts and the outcomes of the engagement activities with the relevant user groups should be detailed in the future submission.

Public toilets

72. Considering the redevelopment of the MOL space, and the community centre which will be open to the public, it is considered that the proposals should accommodate adequate public toilets provision, in line with Policy S6.
73. The applicant should therefore explore location and details to ensure that the proposed toilets would be easy to find and access and suitable for a range of users, including disabled people, families with young children and people of all gender identities. They should also comprise a changing place toilet.
74. Their delivery and management (including wayfinding) should in due course be secured by condition or obligation as part of any permission.

Free drinking water

75. The applicant should identify locations that would be appropriate to provide free drinking water, in line with London Plan Policy D8. Its provision and future management should in due course be secured by condition as part of any permission.

Digital connectivity

76. As part of any planning permission, a planning condition should be secured requiring the submission of detailed plans demonstrating the provision of sufficient ducting space for full fibre connectivity infrastructure within the development in line with London Plan Policy SI6.

Heritage

77. As noted in the site description, the application site is in the setting of a number of heritage assets. No heritage information was provided at this stage, but it is noted that a Heritage Impact Assessment (in line with the GLA's [Practice Note: Heritage Impact Assessments and the setting of heritage assets](#)) will need to be provided with the future submission to enable the assessment of the possible impacts of the proposals on the significance of surrounding heritage assets.

Environment

78. Some initial energy, circular economy, whole life-cycle carbon, water and green infrastructure comments have been provided to the applicant under separate cover, which will need to be responded to in the future submission.

Conclusion

79. A replacement leisure centre is strongly supported in principle and the proposed land uses could be acceptable, subject to the applicant successfully minimising the harm to MOL openness and any other harm arising from the application while robustly demonstrating and strengthening all other public benefits.
80. Nonetheless, further discussions are required on the proposed FVA methodology in order to reach an agreed position. In addition, further information will be required in relation to the VSC case.
81. The future application will also need to address the comments made in this report and associated technical comments with respect to design, heritage and environment.

for further information, contact GLA Planning Unit (Development Management Team):

Principal Strategic Planner (case officer)

email: planning@london.gov.uk

Team Leader – Development Management

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email: [REDACTED]n@london.gov.uk
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email: [REDACTED]@london.gov.uk

We are committed to being anti-racist, planning for a diverse and inclusive London
and engaging all communities in shaping their city.

Gurnell Leisure Centre

Local Planning Authority: Ealing

Meeting Date: Thursday 28th March 2024

Meeting Time: 11:00-13:00

Location: Microsoft Teams

The proposal

Demolition of the existing Gurnell Leisure Centre and construction of replacement centre, with enabling residential development (ca. 300 units, 35% AH), as well as landscaping and parkland improvements.

The applicant

The applicant is **London Borough of Ealing**.

The architects are **Mikhail Riches, GT3 Architects** and **Periscope**.

Context

On 25 February 2024, the GLA received a request for a pre-application meeting to discuss the above proposal.

Key issues for consideration and discussion at the meeting

Based on the material provided in advance of the meeting, the following strategic issues have been identified for discussion:

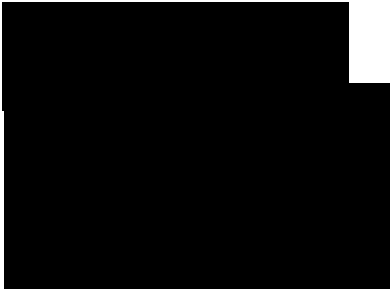
1. **Introductions**
2. **Background and presentation of scheme by applicant (max 45 minutes)**
3. **Summary of discussions with LPA**
4. **Land use principles and Equalities**
5. **Affordable housing and Viability**
6. **Urban design and Heritage**

7. Energy, WLC and CE

8. Next steps

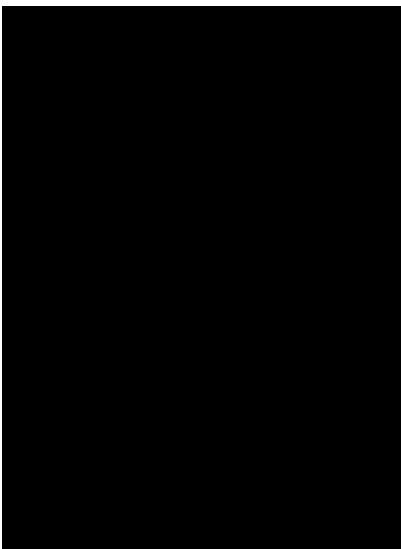
Attending

GLA Group:



GLA Case officer
Team leader (Development Management)
Urban Design officer
Viability officer
Energy officer
Circular economy officer
Whole life-cycle carbon officer

LPA:



LB Ealing Case Officer

LB Ealing (Applicant)
Mikhail Riches
GT3 Architects
GT3 Architects
Periscope
Expedition/ Useful Projects
Expedition/ Useful Projects
Savills
Tibbalds Planning and Urban Design
Tibbalds Planning and Urban Design

for further information, contact GLA Planning & Regeneration Unit (Development Management Team):

Principal Strategic Planner, Case Officer

Email: [\[redacted\]@london.gov.uk](mailto: [redacted]@london.gov.uk)



GREENGAUGE



MIKHAIL
RICHES



gleeds

periscope **Tibbalds**

Gurnell Sustainability and Energy Strategy

GLA Pre-App Meeting 1

Certified

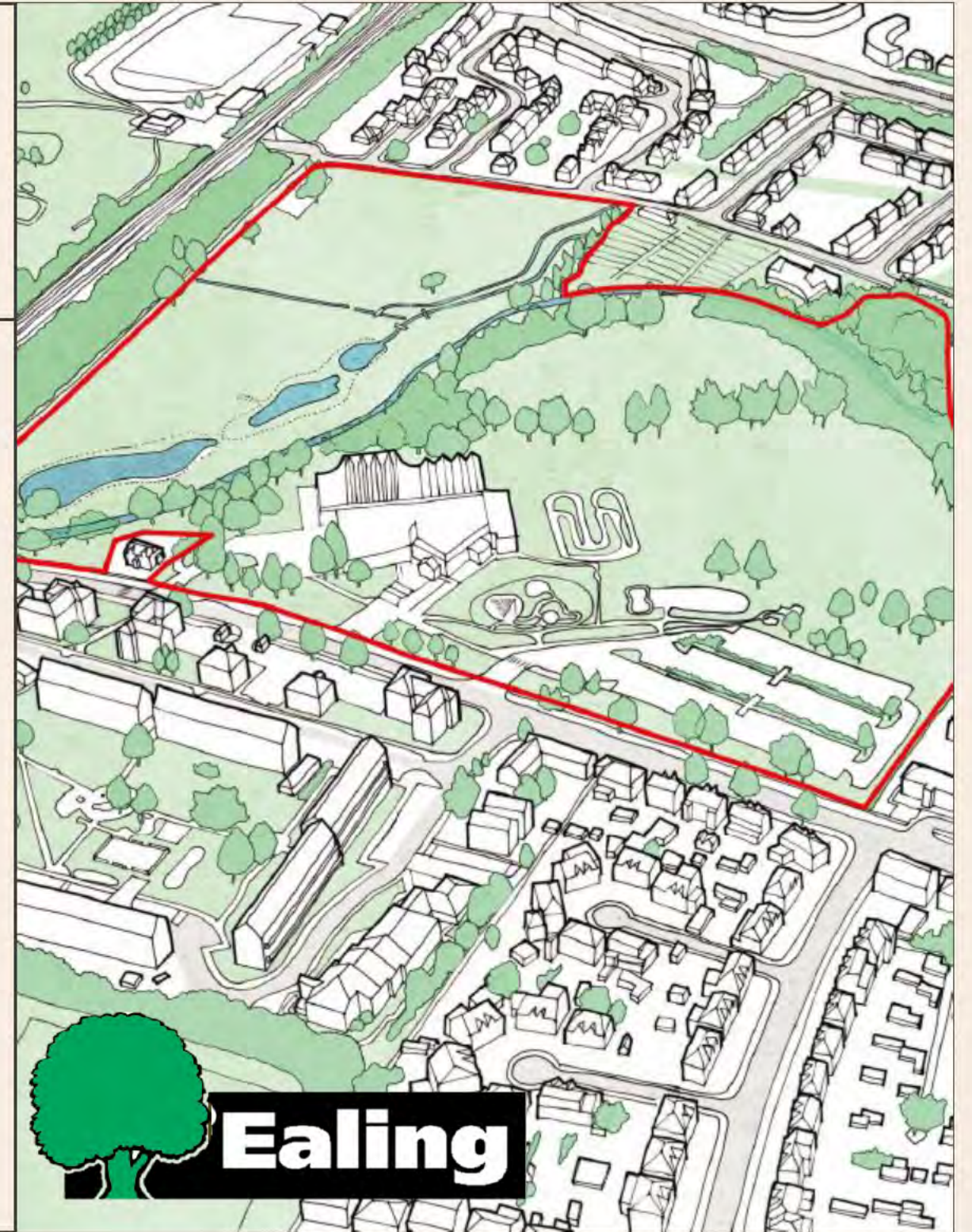


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Agenda

Purpose	Share progress against the Gurnell masterplan sustainability strategy
Outcome	Feedback and agreement in principle on the level of ambition and direction of travel
Structure	Sustainability vision Strategy setting process Theme overview Subtheme detailed strategies • Biodiversity and wildlife networks • Climate resilient place • Renewable water and energy systems • Whole life carbon • Circular economy • Sustainable transport • Inclusive community

Vision

A shared vision

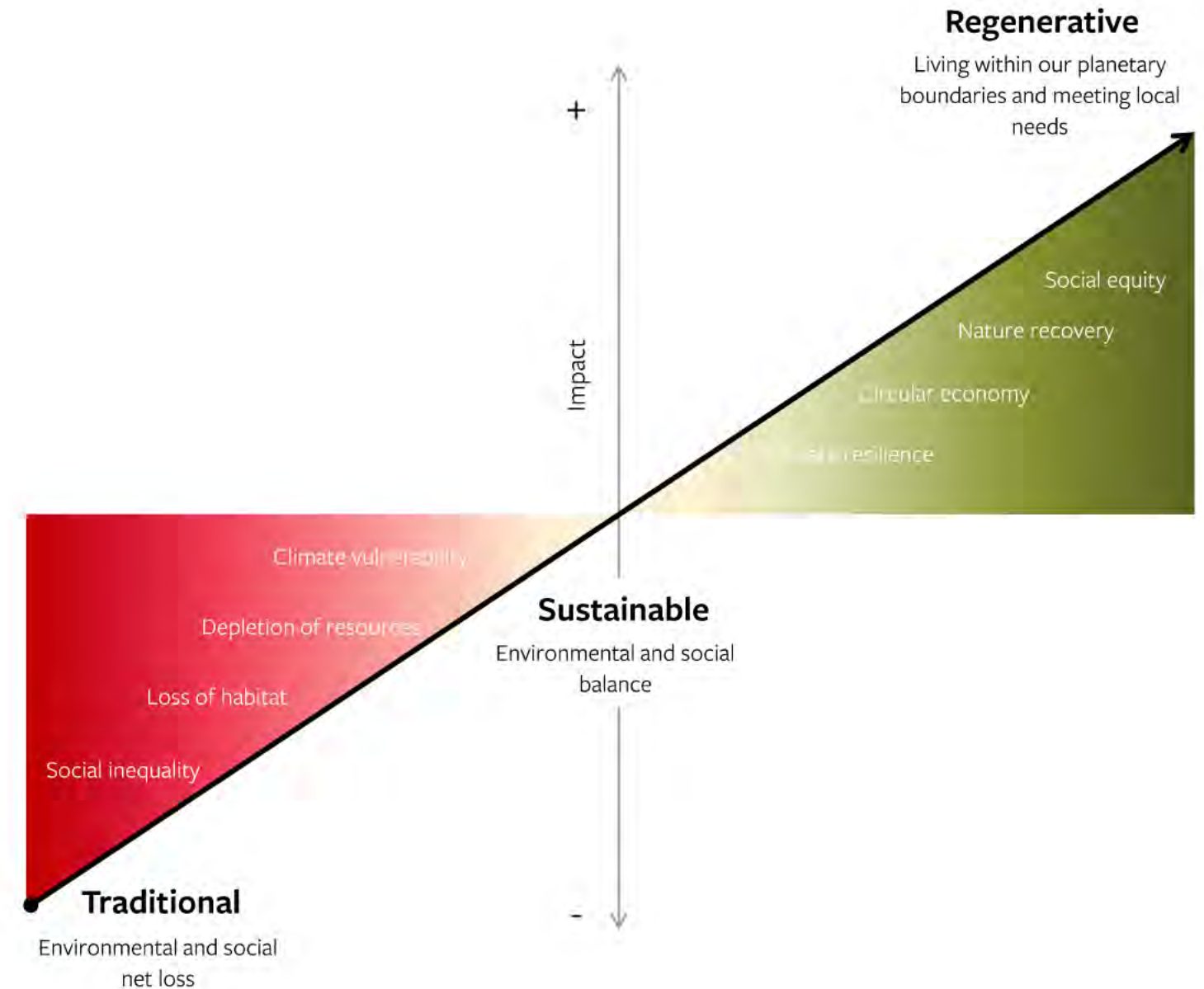
The Gurnell masterplan sets out a vision for a vibrant and inclusive leisure quarter that supports health and recreation and paves the way for a just transition for West London by embracing a regenerative approach to development.

Regenerative themes:

Part of the Park: A place that enhances local wildlife corridors and protects green space; combatting the climate and ecological emergencies while supporting local communities to reconnect with nature.

Renewable resources: A place that invests in low-carbon, circular design and systems; generating a renewable, net zero carbon and low-cost legacy.

Thriving community: A place that acts as shared resource for the local community; prioritising connectivity, inclusivity and accessibility to enable the whole community to thrive.



Regenerative themes

The Gurnell masterplan sustainability strategy is proposed to revolve around three regenerative themes which consider both environmental and social sustainability.



Policy mapping

The sustainability strategy has been set out in line with the relevant planning and regulatory requirements and mapped against each of the strategy themes and subthemes.

The London Plan (2021)	Development Strategy 2026 (2012) and Development Management (2013)	Emerging Ealing Local Plan (consultation draft)	Ealing Climate and Ecological Emergency Strategy (2021)	National Legislation
	 			

Targets and aspirations

Theme					Proposed ambition	
Theme	Minimum requirements	Barriers & risks	Value & political drivers	Multiple benefits	Level of ambition	Priority areas
	Scheme baseline which achieves minimum planning requirements (inc. but not limited to): ➤ GLA London Plan ➤ Ealing Local Plan (& consultation draft) ➤ Ealing Council Plan ➤ Ealing Climate and Ecological Emergency Strategy	Apparent barriers and/or risks of pursuing a scheme that meets the minimum requirements only. Risks have been grouped as: ➤ <u>Political</u>: Possible planning risk and/or misalignment with borough political message ➤ <u>Technical</u>: Site specific technical risks ➤ <u>Financial</u>: Life cycle cost viability risk	Qualitative assessment (RAG) of the potential value and/ or political drivers supporting a scheme that exceeds the minimum requirements. 'Value' has been defined as: ➤ Aide with the GLA planning process ➤ Support LB Ealing's objectives ➤ Wider public benefit	Opportunities to achieve multiple objectives in a cost-effective way.	Whether we recommend meeting or exceeding planning for each subtheme. ➤ Minimum requirements ➤ Recommended ambition to mitigate project key risks ➤ Aspirational ambitions currently out of scope	Topics which should be prioritised as they are high effort but also high impact that will deliver multiple benefits.

Regenerative outcomes and objectives

Theme

Park of the park



Renewable resources



Thriving community



Outcome

A place that enhances local wildlife corridors and protects green space; combatting the climate and ecological emergencies while supporting local communities to reconnect with nature.

A place that invests in low-carbon, circular design and systems; generating a renewable, net zero carbon and low-cost legacy.

A place that acts as shared resource for the local community; prioritising connectivity, inclusivity and accessibility to enable the whole community to thrive.

Objectives

Biodiversity and wildlife networks

Increase biodiversity and connect and enhance local nature networks to strengthen local wildlife systems.

Climate resilient place

Use nature-based solutions alongside technological strategies to protect people and assets against climate change impacts.

Healthy places

Design, construct and operate buildings that promote health and wellbeing of occupants.

Pollution-free site

Avoid all types of pollution through construction and operation to support local ecosystems and local people both onsite and the surrounding area.

Renewable water and energy systems

Harness natural resources to generate clean and renewable energy and water sources.

Whole life carbon

Design, construct and operate for low operational and embodied carbon emissions throughout the asset's lifespan

Circular design and economy

Maintain existing assets and materials at their highest value and build new assets that are durable, flexible, long lasting and low carbon to meet current and future needs. Enable occupants and visitors to reduce waste and maximise reuse and recycling.

Active and sustainable travel

Enable a transition to a carbon-free transport network through appropriate provision of sustainable transport infrastructure.

Inclusive community

Create a place that celebrates diversity and where everyone feels welcome to live, learn, play, visit and work.

Affordable and easy to run

Provide affordable community services and housing for the long term

Local economy

Invest in the local community providing neighbourhood amenities and opportunities for local businesses.

Active lifestyles

Increase accessibility for local people to live a healthy, safe and active lifestyle.

Part of the park

Overview



Theme outcome

A place that enhances local wildlife corridors and protects green space; combatting the climate and ecological emergencies while supporting local communities to reconnect with nature.

Project targets

	Minimum targets (policy-led)	Aspirational targets (project-led)
Biodiversity and wildlife networks	10% Biodiversity Net Gain. - Complement existing ecological networks and in alignment with BAPs. - Maintain urban forests and woodlands. 0.4/0.3 Urban Greening Factor for residential-led/ commercial-led developments.	>70% mature tree retention. 20% increase in tree cover. 30% green roof coverage. - Building with Nature accreditation.
Climate resilient place	- Follow drainage hierarchy and limit peak stormwater discharge to greenfield run-off rates. - Permeable paving where technically feasible. - Complete overheating risk analysis, CIBSE TM52 (non-resi), TM59 (resi), and TM49 (both). - Maximise the provision of dual aspect dwellings.	- No engineered buried tank attenuation solutions. - Design homes and leisure building to be resilient to RCP 8.5.
Healthy places	- High-quality design and provide adequately-sized rooms. - Provide sufficient daylight and sunlight to new and surrounding housing. >5 m² (+1 m² per add. occupant) of private outdoor space. - Manage noise and other nuisances.	
Pollution-free site	- Prevent or minimise increased exposure to existing air pollution. - Make provision to address local problems of air quality.	

Key strategies

Biodiversity and wildlife networks: See subsequent pages

Climate resilient place: See subsequent pages

Healthy places:

- Single aspect residential units minimised with no social rented single aspect
- All residential units meet National Space Standard
- High quality play and amenity provision for residents
- Connection of Ealing’s leisure quarter with new high quality public facilities

Pollution free site:

- No fossil fuels on site improving local air quality
- Mature tree retention and new planting strategy to improve air quality and noise nuisance

Part of the park

Biodiversity and wildlife networks

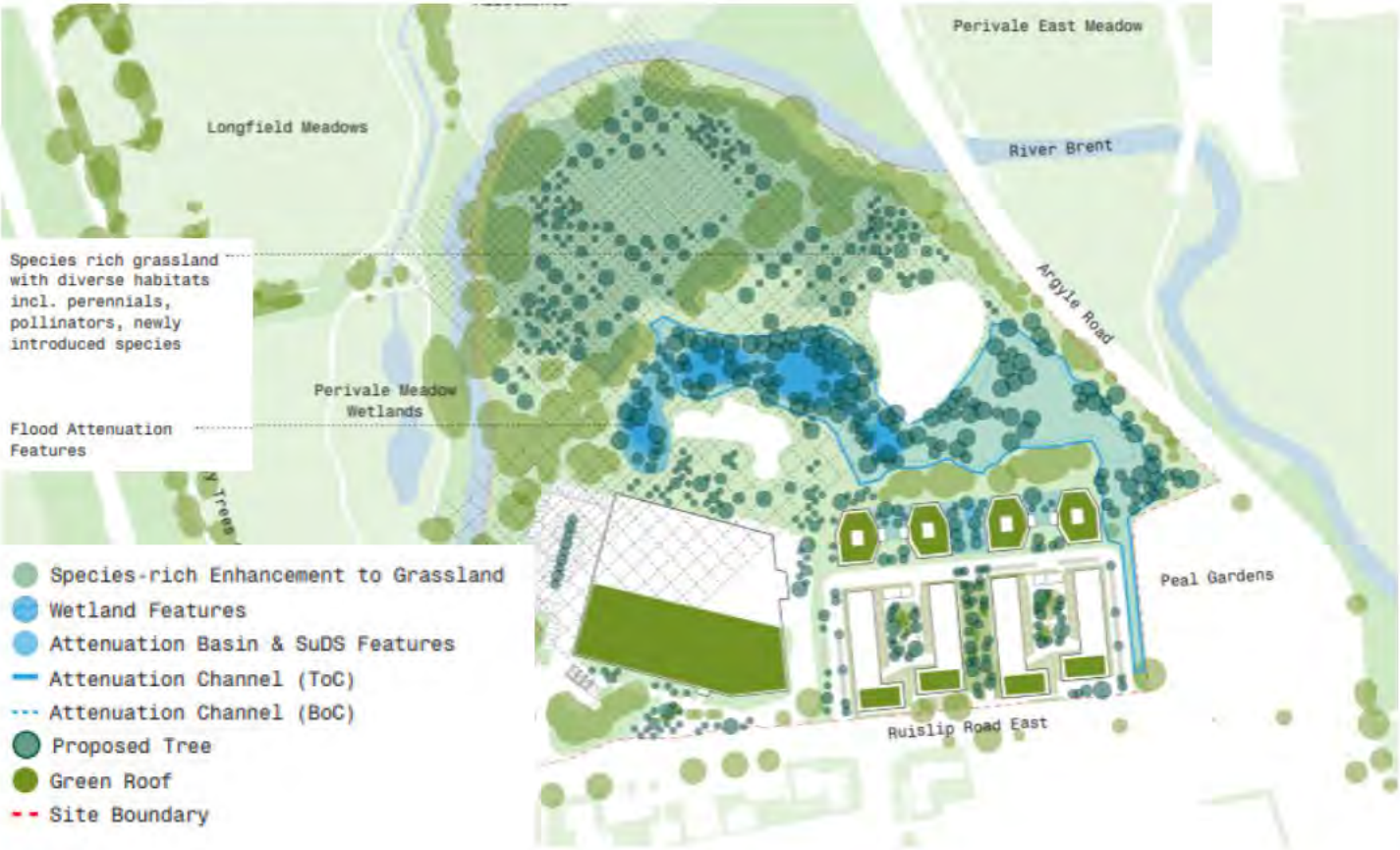


Key constraints and opportunities:

- Existing site has high ecological value
- Adjacency to the River Brent offers opportunity for blue infrastructure integration

Surveys, assessments or studies carried out to inform the strategy:

- Existing tree survey
- Ecological baseline



Emerging strategy:

Green infrastructure	• Leaving areas of high ecological value untouched • Species rich grassland with diverse habitats • Green roofs on all buildings
Trees	• Extensive tree planting strategy with mature tree removal avoided as far as possible
Blue infrastructure	• Wetland features to enhance blue ecosystems

Part of the park

Climate resilient place

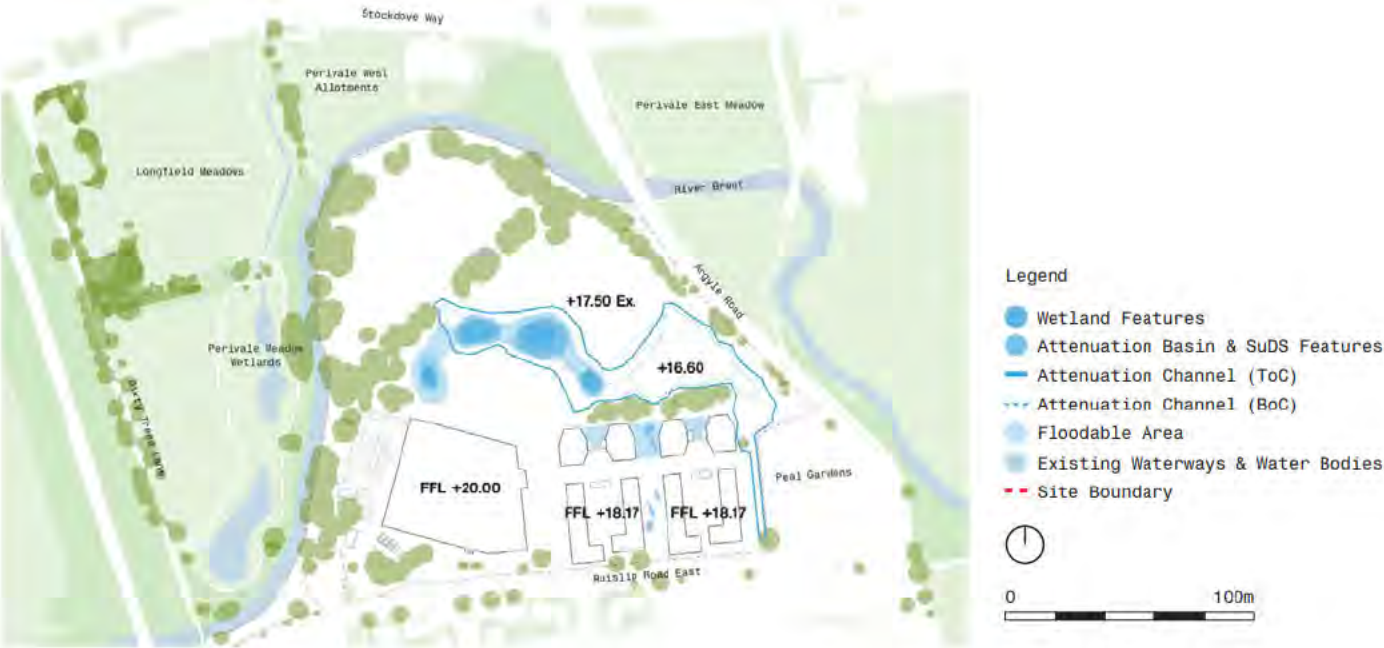


Key constraints and opportunities:

- Site is in flood zone 3 limiting development in certain areas across the site and requirements for flood volume compensation
- Green space offers opportunity to manage urban heat island for the site and surrounds

Surveys, assessments or studies carried out to inform the strategy:

- Flood compensation analysis
- Hydraulic assessment of flooding mechanism on and around the site
- Engagement with the EA and LLFA to agree sustainable stormwater discharge into the river
- Early stage TM 59 assessment on select units to verify if active cooling is required



Emerging strategy:

Stormwater management	
Store rainwater for later	Irrigation water from wetland features
Use infiltration techniques	Permeable paving proposed everywhere except vehicle traffic roads
Attenuate rainwater in ponds or open water	Wetland features to provide above ground amenity and biodiversity
Attenuate rainwater by storing tanks	N/A
Discharge rainwater direct to watercourse	Given site's proximity to the River Brent, it is advisable to discharge rainwater directly to the river as opposed to attenuating on site to alleviate peak run off.
Discharge rainwater to a surface water sewer	N/A
Discharge rainwater to a combined sewer	N/A
Overheating	
Energy efficient design	High performance façade and minimisation of thermal bridging
Optimised orientation, shading, albedo, fenestration, insulation and green roofs	Building orientation to avoid South West exposure, low glazing ratio, green roofs
Internal thermal mass	Concrete frame residential buildings with exposure thermal mass where possible
Passive ventilation	Dual aspect units with openable windows
Mechanical ventilation	High efficiency MVHR
Active cooling	Ambient loop ground source which can provide heating and cooling

Renewable resources

Overview



Theme outcome

A place that invests in low-carbon, circular design and systems; generating a renewable, net zero carbon and low-cost legacy.

Key strategies

See subsequent pages

Project targets

	Minimum targets (policy-led)	Aspirational targets (project-led)
Renewable water and energy systems	>35% site-wide and >50% residential operational carbon reduction beyond London Plan Part L. - Report/ benchmark against <35 kWh/m2/year (residential), <55 kWh/m2/year (leisure centre) EUI. - Report/ benchmark against <15 kWh/m2/year space heating demand. (residential). <105 l/pp/day water consumption (residential).	- Passivhaus principles (residential). <250 kWh/m2/year EUI (leisure centre). <30% reliance on carbon offsetting. - All electric scheme. 40% reduction in water use against the baseline (leisure centre).
Whole life carbon	Undertake whole life-cycle carbon assessment.	Achieve LETI Band C embodied carbon.
Circular design and economy	- Complete pre-demolition and pre-redevelopment audits. >20% re-used/recycled content. >95% reuse/recycling/recovery of demolition waste. >95% beneficial use of excavation waste. >65% municipal waste recycling by 2030.	- Employ elemental/ material reuse strategy for existing leisure centre. - Design for flexibility of future use according to 'lean start, long life, loose fit, low carbon' principles.
Active and sustainable travel	- Cycle parking: 2 long-stay and 2 short-stay per dwelling for 5-40 dwellings, 1 space per 40 dwellings thereafter. >80% of all journeys using sustainable travel. >20% residential parking with active charging facilities. - Align with Building Regulations Part S.	- Improve cycle and pedestrian routes around site. - Connect surrounding communities with green and blue infrastructure .

Renewable resources

Renewable water and energy systems



Key constraints and opportunities:

- Limited capacity in West London electricity grid
- Leisure centres have high energy demands (e.g. pool heating)
- Opportunity for energy balancing due to constant demand for both heating and cooling

Surveys, assessments or studies carried out to inform the strategy:

- Utilities search and feasibility study from SSEN (pending)
- Desktop review of possible energy solutions (network vs. site vs. building level)
- Early engagement with borehole providers to inform site wide strategy
- PHPP assessment of select residential units at RIBA 2
- Desktop study to inform leisure centre energy use intensity (EUI) target

Emerging strategy:

	Residential	Leisure
Energy		
Be lean	• Optimised orientation and form • High performance façade inc. triple glazed windows and good airtightness • Design out thermal bridging	• High performance façade • Thermal zoning
Be clean	• All electric, no gas • 5th generation ambient heat network using boreholes for source/ sink with “shoebox” heat pumps per unit (heating and cooling) • Mechanical ventilation via MVHR	• All electric, no gas • Air source or ground source-led solution – strategy unconfirmed
Be green	Target 70% roof area	Target 40% of roof area (avoid above long spans)
Be seen	Energy monitoring by unit	Submetering strategy
Water		
Water saving measures	Low flow fixtures and fittings	• Low flow fixtures and fittings • Intelligent cleaning schedules • Pool covers • Grey water recycling of the pool back wash for toilet flushing

Renewable resources

Whole life carbon



Key constraints and opportunities:

- Limited precedents of good practice embodied carbon for leisure centres
- Pool construction requiring retaining structures which are resource intensive
- Demand for durable and easy to clean finishes limiting material pallet
- Limited structural options for residential in light of current regulatory constraints

Surveys, assessments or studies carried out to inform the strategy:

- RIBA 2 WLC assessment of the structure (inc. pool) to set target and appraise options
- Design team workshop
- Carry out pre-demolition audit to identify reuse and onsite recycling opportunities

 Substructure & Superstructure	A1 - A5:	2,402 tCO ₂ e	260 kgCO ₂ e/m ²
	Biogenic Carbon:	-156 tCO ₂ e	-17 kgCO ₂ e/m ²
	A-C:	2,603 tCO ₂ e	282 kgCO ₂ e/m ²
	Module D:	-346 tCO ₂ e	-37 kgCO ₂ e/m ²

Leisure centre early stage verification:

In order to meet LETI Band C (office), the substructure and superstructure should account for approx. 350 kgCO₂e/m² (A-C). The early stage assessment verifies the current design is 20% below this limit, so on track to achieve Band C.

LETI Bands (A-C)

Band	Office
A++	<150
A+	<345
A	<530
B	<750
C	<970
D	<1180
E	<1400
F	<1625
G	<1900

Emerging strategy:

	Residential	Leisure
Substructure	• Design out basements and minimise car parking	• Design out basements
Superstructure	• Rationalise column spacing • Specify low carbon concrete	• Utilise low carbon materials (CLT and GluLam) for long spans and other uses • Minimise weight on long span areas (lightweight green roof only, no PVs) • Stack columns above podium level to avoid transfer slabs
Façade		• Avoid new façade material by reusing the existing concrete panels
Services	• Simplified ambient loop system with low maintenance requirements • Low GWP refrigerant with good practice maintenance strategy	• Centralised energy systems to minimise equipment • Low GWP refrigerant with good practice maintenance strategy
Internal finishes		• Design out finishes where not necessary (e.g. exposed concrete floors)
FFE		
External works	• Utilise reclaimed material in the landscape • Minimise hard landscape areas • Site won crushed concrete for site levelling	• Utilise reclaimed material in the landscape • Minimise hard landscape areas • Reuse existing infrastructure where possible • Site won crushed concrete for site levelling

Renewable resources

Circular economy



Key constraints and opportunities:

- Opportunity to reclaim materials from the existing centre
- Leisure centre uses often follow trends
- Residential flexibility and future adaptability challenges given space standard constraints
- Limited opportunities for future deconstruction of insitu concrete frame buildings

Surveys, assessments or studies carried out to inform the strategy:

- Pre-redevelopment audit of the existing leisure centre
- Pre-demolition audit of the existing leisure centre
- Desktop study of whether the existing piles can be reused in-situ
- Design team circular economy workshops



Emerging strategy:

	Residential	Leisure
Site	• Design out basements and minimise car parking • Deconstruction of the paving stones and other material for reuse in the landscape • Crush remaining concrete on site for site levelling and the pile mat	• Design out basements and minimise car parking • Deconstruction of the paving stones and other material for reuse in the landscape • Crush remaining concrete on site for site levelling and the pile mat
Structure	• Rationalise column spacing	• Minimise weight on long span areas (lightweight green roof only, no PVs) • Stack columns above podium level to avoid transfer slabs • Dismountable steel and timber frame for future reuse • Flexible internal layouts
Skin		• Avoid new façade material by reusing the existing concrete panels
Services	• Access to services for maintenance, repair, replacement	• Access to services for maintenance, repair, replacement
Space		• Design out finishes where not necessary (e.g. exposed concrete floors)
Stuff		• Avoid rigid equipment and play structures for easier upgrade

Renewable resources

Active and sustainable travel

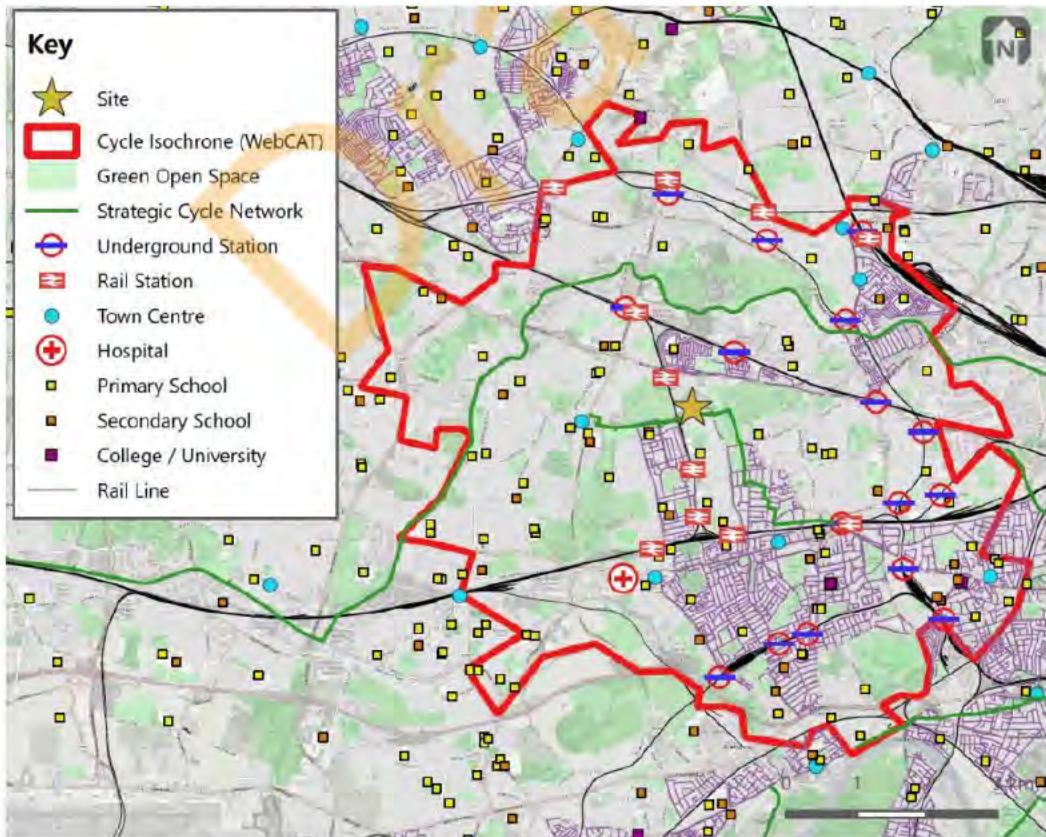


Key constraints and opportunities:

- PTAL score of 2/3 with long walking distances to nearest underground or rail station
- Scores poorly on existing Healthy Streets assessment without safe crossings, pedestrian ways and connected cycle infrastructure

Surveys, assessments or studies carried out to inform the strategy:

- Active Travel Zone assessment including Healthy Streets assessment and 20-minute isochrone of the existing site



Emerging strategy:

Cycle parking	• A bespoke cycling provision strategy that is appropriate for leisure centres (e.g. “medium” stay uses) being explored • Ambition to provide more cycle parking than car parking on the leisure centre • Showers and locker provision in the leisure centre to support active travel • Alternative parking options (e.g. cargo bikes) being explored • Above ground and accessible long stay cycle residential cycle parking
Car parking	• 150 car parking spaces. 20% with EV active connection and remainder with passive. • Dedicated car pooling and car sharing spaces • <20% car parking spaces to number of residential with EV supplied blue badge spaces
Connection to existing infrastructure	• Improvements to the bus stop and cycle lane on Ruislip Road to improve safety and desire lines
Site permeability	• New pedestrian and cycle routes through the site to improve access and reduce travel distances North South through the site • Open and desirable access for non-residents through the site to access the park
20-minute neighbourhood provision	• New leisure centre and facilities for local residents improving 20-minute neighbourhood provisions beyond site boundary • Café and other amenities to be provided

Thriving community

Overview



Theme outcome

A place that acts as shared resource for the local community; prioritising connectivity, inclusivity and accessibility to enable the whole community to thrive.

Project targets

	Minimum targets (policy-led)	Aspirational targets (project-led)
Inclusive community	- Blind design (design is indistinguishable between different price brackets). - Achieve the highest standards of accessible and inclusive design. - Design and Access Statements should include an inclusive design statement. >10% M4(3) dwellings, with the rest M4(2).	Extensive community engagement with community groups and clubs
Affordable and easy to run	>35% affordable housing or 50% for public sector land where there is no portfolio agreement with the Mayor.	
Local economy	Section 106 requirements.	
Healthy lifestyles	>10 m² of play space should be provided per child with incidental play space play space incorporated.	- Landscape supporting mental health. - Accessibility and diversity centric design.

Key strategies

Inclusive community: See subsequent pages

Affordable and easy to run:

- 35% affordable housing provision with shared and accessible courtyards with all tenures
- Low energy buildings to reduce running costs
- Durable and easy to clean finishes in the leisure centre

Local economy:

- New community hub to support the local community
- Improvements to local social infrastructure

Healthy lifestyles:

- Safe play spaces with passive surveillance courtyards
- Park upgrades to meet diverse user needs considering gendered uses, accessibility and safety

Thriving community

Inclusive community



Key constraints and opportunities:

- Designing spaces for all ages and abilities
- Addressing health and wellbeing of existing and new residents
- Providing services that meet current and future needs and interests
- Addressing inequalities and access to public services

Surveys, assessments or studies carried out to inform the strategy:

- Engagement with security specialist

Emerging strategy:

Accessibility	• Level access to and within the centre and within the building with gentle slopes, ramps and lifts • Rest points provided across the site • Accessible and user friendly wayfinding • Accessible and family friendly WCs and changing areas • Pools designed to accommodate community and club uses with moveable floors and booms and submersible wheelchair access to enable use by all ages and abilities • 10% of dwellings meet Part M(3) ‘accessible and adaptable dwellings’
Safety	• Crime prevention in line with NPPF • Lighting carefully balanced to create security and ecology • Passive surveillance across the park and residential courtyards
Inclusivity	• ‘Make Space for Girls’ principles embedded in the design of the leisure centre and landscape • Affordable and free spaces for rent within the centre • Tenure blind design of the residences with shared courtyards and play space

Summary of interventions



Regenerative themes:

Part of the park: A place that enhances local wildlife corridors and protects green space; combatting the climate and ecological emergencies while supporting local communities to reconnect with nature.

Renewable resources: A place that invests in low-carbon, circular design and systems; generating a renewable, net zero carbon and low-cost legacy.

Thriving community: A place that acts as shared resource for the local community; prioritising connectivity, inclusivity and accessibility to enable the whole community to thrive.

Appendix

*Further information for reference if
req'd*

Desktop review of possible energy solutions

Options summary

A qualitative appraisal has been carried out comparing the different heating options against key criteria to identify the most appropriate solution for the masterplan. The options compared are:

District level network

Connection to an existing (high temperature / 4th generation) district heat network. Heat substations in each building/plot connected to heat interface units (HIU) in each dwelling and internal heating system in the leisure centre. Provision of cooling would be separate.

Area network

High temperature site wide heat network (with separate cooling network), servicing the leisure and residential plots and oversized to also connect to neighbouring council developments to support borough decarbonisation plans. Central energy centre with commercial heat pumps for heating and cooling. Heat substations in each building/plot with heat interface units (HIU) in each dwelling.

Site level 4G network

High temperature site wide heat network (with separate cooling network), servicing both the leisure and residential plots. Central energy centre with commercial heat pumps for heating and cooling. Heat substations in each building/plot with heat interface units (HIU) in each dwelling.

Site level 5G network

A low temperature/ambient (5th generation) heat network, servicing both the leisure and residential plots. Central air source heat pump (ASHP) and/or shared ground array (boreholes) with local water source heat pumps for each dwelling and leisure centre.

Building level 4G network (residential)

High temperature communal heat networks for each building/plot. Central air source heat pumps with heat interface units in each dwelling. Provision of cooling would be separate.

Building level 5G network (residential)

Low temperature communal heat network. Shared ground array with local water source heat pumps and hot water cylinders in each dwelling. Same systems can also provide cooling.

Building level (leisure)

Ground source heat pumps and/or 4-pipe heat pump chillers to provide simultaneous heating and cooling to the leisure centre.

Desktop review of possible energy solutions

Options appraisal

Criteria	District level network	Area network	Site level 4G network	Site level 5G network
Planning	The site sits outside of any existing or proposed heat networks. It does however sit in the heat network priority area spanning most of London.	Central energy centre with single point of connection to future district heat networks. Follows GLA guidance.	Central energy centre with single point of connection to future district heat networks. Follows GLA guidance.	Central energy centre with single point of connection to future district heat networks, however perceived concerns with integration into future high temperature networks. In the case of an existing or planned area wide DHN, confirmation must be provided by the network operator that such an arrangement is suitable.
Power supply		Heat pump solutions place greater loads onto the power network. Given already constrained capacity, oversizing the energy centre to supply for neighbouring sites is likely to be deemed undeliverable by the utility provider. Slightly higher diversity achieved on a single network and marginally lower heat demand.	Heat pump solutions place greater loads onto the power network. Slightly higher diversity achieved on a single network and marginally lower heat demand.	Heat pump solutions place greater loads onto the power network. Slightly higher diversity on a single network with marginally lower heat demand. Potential for energy sharing between uses (resi/leisure) but unlikely to have a considerable effect on peak loads.
Space requirements		Extremely large central external area/ roof space for heat pumps on protected MoL land. Oversized central energy centre for ancillary equipment. Plant space for heat substations in buildings and for heat interface units (HIU) in each dwelling. Additional plant required for provision of cooling	Large central external area/ roof space for heat pumps. Central energy centre for ancillary equipment. Plant space for heat substations in buildings and for heat interface units (HIU) in each dwelling. Additional plant required for provision of cooling.	Large central external area/ roof space for heat pumps. Central energy centre for auxiliary equipment. Plant space in each dwelling and leisure centre for water source heat pumps (WSHP) and water cylinders.
Performance		High temperature network, with very high heat loss (approx. 50%) and risk of overheating. There is not expected to be any excess heat to be exported and shared with the neighbouring sites.	High temperature network, with higher heat loss and risk of overheating.	Low temperature network, no/minimal heat loss. System can provide heating and cooling. Performance improved by potential to share heat across the network. However, understanding is any rejected heat from the leisure centre would be used within the leisure centre itself, with no export to the residential plots.
Phasing/ deliverability		Site wide approach complicated by phasing. Requires primary pipework installation but can be extended with each phase. Added complexity with connection to neighbouring sites.	Site wide approach complicated by phasing. Requires primary pipework installation but can be extended with each phase.	Site wide approach complicated by phasing. Requires primary pipework installation but can be extended with each phase.
Adaptability/ flexibility		Constrained by primary heating infrastructure.	Constrained by primary heating infrastructure.	Highly adaptable. The low temperature network is compatible with a variety of heat sources. Requires primary heating infrastructure.
Procurement, operations and maintenance		B Ealing/ development partner will need to procure a third party to own, operate and manage. Traditionally delivered through an Energy services company (ESCO).	LB Ealing/ development partner will need to procure a third party to own, operate and manage. Traditionally delivered through an Energy services company (ESCO).	LB Ealing/ development partner will need to procure a third party to own, operate and manage. Traditionally delivered through an Energy services company (ESCO).
Climate change, overheating risk		High temperature network has potential to exacerbate overheating risk, particularly in common areas. No provision for cooling, requiring additional systems to meet likely mechanical cooling demand.	High temperature network has potential to exacerbate overheating risk, particularly in common areas. No provision for cooling, requiring additional systems to meet likely mechanical cooling demand.	No/ minimal heat loss, helping reduce overheating. Can provide cooling, with the rejected heat recovered and used to heat hot water.
Air quality		No combustion equipment/ gas. No impact on air quality.	No combustion equipment/ gas. No impact on air quality.	No combustion equipment/ gas. No impact on air quality.

Desktop review of possible energy solutions

Options appraisal

	Building level 4G heat network (residential)	Building level 5G heat network (residential)	Building level network (leisure)
Planning	Distributed plant rooms in each building/plot. No single point of connection. Does not follow GLA heating hierarchy.	Individual WSHP's with no single point of connection, however could potentially provide space for connections to future offsite heat network, if required.	Single plant room with single point of connection for any future DHN.
Power supply	Heat pump solutions place greater loads onto the power network.	Heat pump solutions place greater loads onto the power network. Ground source solutions have higher efficiency particularly in winter (higher COP and less electrical power input).	Heat pump solutions place greater loads onto the power network. Ground source solutions have higher efficiency particularly in winter (higher COP and so less electrical power input).
Space requirements	Distributed external/ roof space for plant. Building level plant rooms for ancillary equipment. Plant space in dwellings for heat interface units.	No/minimal central plant (for pumps). Plant space in dwellings for heat pumps and water cylinder.	Central plant room.
Performance	High temperature network, with higher heat loss and risk of overheating.	Low temperature network, no/minimal heat loss. System can provide heating and cooling. Performance improved by potential to provide passive cooling or active cooling, in which case the rejected heat can be recovered and used to heat hot water for "free".	Can provide simultaneous heating and cooling, recovering heat for use within the building.
Phasing/ deliverability	Building-level approach simpler to deliver phase by phase.	Building-level approach simpler to deliver phase by phase.	Building-level approach simpler to deliver phase by phase.
Adaptability/ flexibility	Building level approach is highly flexible. Each phase can adapt to changing technology and policy.	Building level approach is highly flexible. Each phase can adapt to changing technology and policy.	Building level approach is highly flexible. Each phase can adapt to changing technology and policy.
Procurement, operations and maintenance	Building-level approach could be delivered through an annual management contract.	Building-level approach could be delivered through an annual management contract. Can enter a long-term contract with ground source provider.	Building-level approach could be delivered through an annual management contract. Can enter a long-term contract with ground source provider.
Climate change, overheating risk	High temperature network has potential to exacerbate overheating risk, particularly in common areas. No provision for cooling, requiring additional systems to mitigate likely overheating risk.	No/ minimal heat loss, helping reduce overheating. Can provide passive cooling or active cooling, in which case the rejected heat can be recovered and used to heat hot water for "free".	Can provide simultaneous heating and cooling, recovering heat for use within the building.
Air quality	No combustion equipment/ gas. No impact on air quality.	No combustion equipment/ gas. No impact on air quality.	No combustion equipment/ gas. No impact on air quality.

Desktop review of possible energy solutions

Summary and recommendations

The qualitative appraisal concludes that the district, area and site level energy networks are not viable and therefore a building level solution is proposed.

The district level network is discounted as the site sits outside any existing or proposed heat networks and therefore there will not be a network to connect into within the delivery programme.

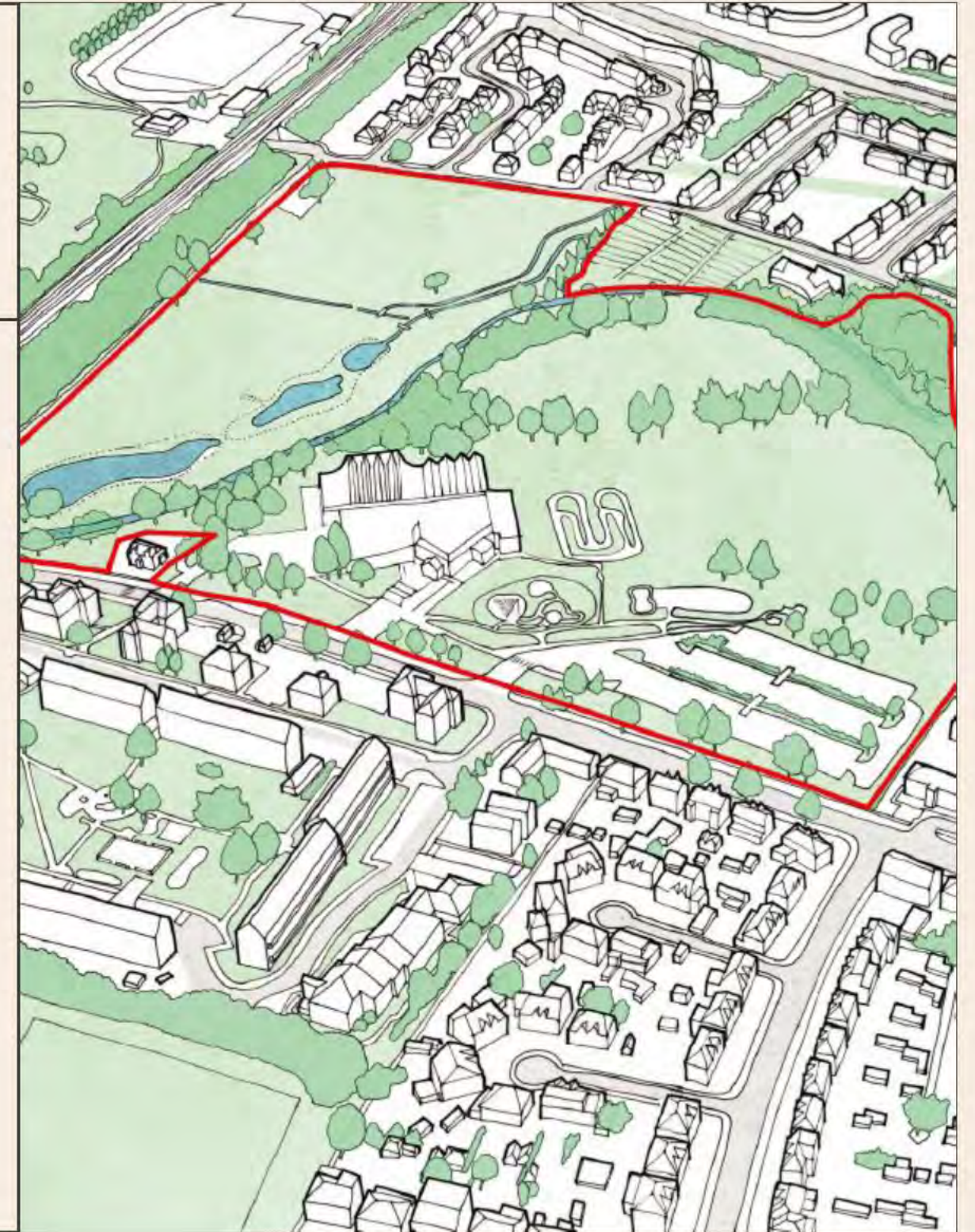
The area level network is discounted as it would be a highly inefficient system requiring twice the energy consumption with approx. 50% heat losses. An area network would be both expensive and space intensive due to the need to run parallel heating and chilled water pipework and include a centralised energy centre, either on a rooftop (reducing space for PV and increasing pipe lengths for external network connection) or in an acoustically screened enclosure at ground level (encroaching further into the MOL). Additionally, there is not expected to be any excess heat from the new development to be exported and shared with the neighbouring sites.

The site level networks are discounted due to the imbalance of energy loads between the residential plots and leisure centre. The leisure centre requires both heating and cooling and will make use of heat being rejected by cooling plant within the building itself for pool water and pool hall heating, with no further opportunity for exporting heat to the residential development, if a connection was made.

For the above noted technical justifications, a building-level energy strategy is proposed treating the residential and leisure plots independently.

Gurnell Masterplan

Pre-redevelopment audit



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Version	Date	Produced By	Checked By
Version 1	27/10/23	H. Cormick	G. Oates

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Introduction

Purpose

The purpose of the pre-redevelopment audit, as described in the London Plan (2021) circular economy statement guidance, is to understand whether existing buildings, structures and materials can be retained, refurbished, or incorporated into the new development. The audit is to fully explore options for retaining existing structure, fabric or components, and the potential to refurbish. The pre-redevelopment audit is one of the key components of the circular economy statement for schemes referable to the GLA.

Approach

As part of the feasibility study carried out in early 2022, prior to appointing the full design team and prior to the latest GLA circular economy statement guidance release, an existing site appraisal was carried out to explore retrofit versus rebuild option of the Gurnell leisure centre. This document summarises that study and brings it in alignment with the GLA’s London Plan requirements.

Outcome

The outcome of the audit is to provide the technical justification for redeveloping the site and assess options for retrofit versus rebuild to support a client to make an evidence-based holistic decision.

Summary of documents that form the development’s circular economy statement

	Purpose	By
Pre-redevelopment audit	The evidence base to support the decision whether to retrofit or rebuild	Expedition
Pre-deconstruction audit	Detailed inventory of the materials that will need to be managed in deconstruction	Expedition
Site waste management plan (SWMP)	The plan for waste management during construction	Others (TBC)
Operational waste management plan (OWMP)	The plan for waste management during operations	Others (TBC)
Circular Economy (CE) Strategy	To be prepared based on the conclusion of the above documents	Expedition
Specification for Deconstruction	To be prepared based on the CE strategy	Expedition

Existing site appraisal

Gurnell Leisure Centre is a four-storey (inclusive of one basement level) building constructed in the early 1980s.

The building appears to be predominantly in-situ concrete frame construction with an unusual, corrugated, exposed-aggregate surface to external walls. The roof over the two pool halls is understood to comprise steel trusses spanning approximately 25 metres. The trusses appear to have an unusual diamond shaped cross section.

Columns supporting the roof trusses are steel 'UC' sections. Along the perimeter, these columns sit outside the building envelope and are exposed. The roof soffit is clad in corrugated metal sheeting which is likely to be fixed to a steel sub-frame spanning between the trusses.

There are large areas of glazing to the two pool halls and the main entrance. Otherwise, the elevations are relatively solid.

Substructure and foundation details are not known, but based on the substructure construction and ground conditions it is anticipated the substructure will consist of in-situ floor slabs spanning between ground beams and piles.

Informed by site visits held in May 2022 and September 2023, key observations and opportunities are noted in the adjacent figures.



Concrete podium elements

- Provide much of the 'character' of the building and will include the majority of the building by mass.
- Likely to be serviceable for a long period. Major barrier to energy efficiency improvement due to thermal bridging.



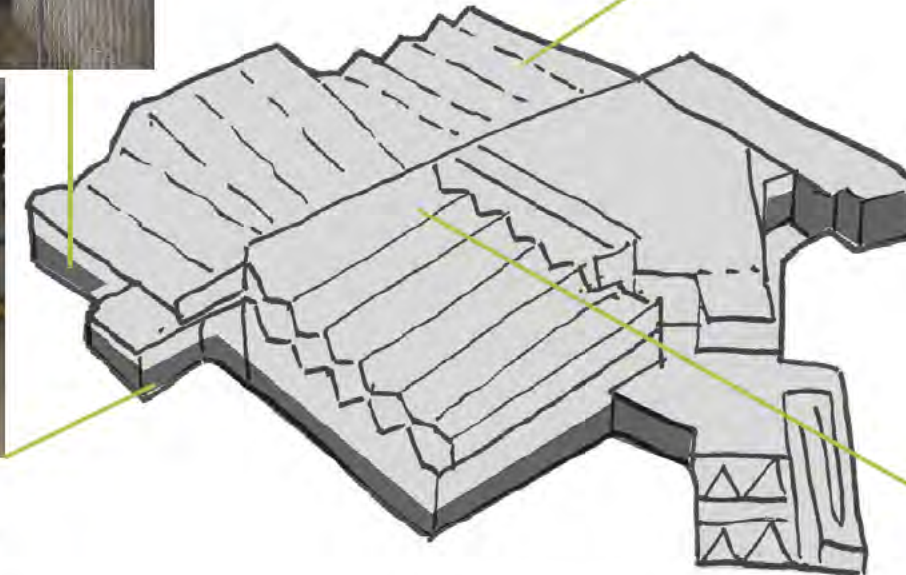
Steel roof and cladding elements

- Very poor quality and significant existing water damage to roof covering. Costly to repair for the next 30 years.
- Relatively lightweight roof construction with low embedded embodied carbon.
- Low possibility of re-use for main roof elements due to complex geometries.



Basement plant systems

- Gas-fired heat and power systems coming to the end of useful life.
- Not easily retrofitted to be 'net zero ready'.
- Likely to need full scale replacement in near future in any scheme - with a likely need to move to electric led heating to meet LBE net zero targets



Existing interiors and pool spaces

- Largely integral construction with rigid finishes - challenging to recover materials in a major refit.
- Existing volumes highly inflexible, except for previous mezzanine gym infills - which are in lighter construction but of limited residual value



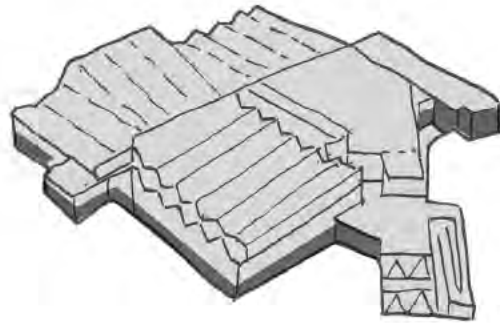
Existing site appraisal

This site appraisal objectively scores the existing building performance against the key criterion which determine a building’s merits for retention, refurbishment or reuse. The outcomes of the appraisal have been used to inform the proposed options for refurbishment versus rebuild.

Criteria	Existing building performance	Score
Floor to ceiling heights	Ceiling heights are not known in precise terms but based on photographic records appear to be ample.	Good
Structural grid	The majority of the building footprint is occupied by the pool halls covered by long span roofs, i.e., the grid is very widely spaced. The remainder of the existing building has an orthogonal grid of approximately 6.0m, adequate for a variety of uses including gyms, changing rooms and offices.	Good
Condition of structure	Due to leaking roof coverings, the long span roof structures and possibly other structural components are believed to be badly corroded and in need of careful demolition. As a result, it has not been possible to carry out a condition survey. In the limited instances where the concrete frame and external walls were visible, they appeared to be in fair or good condition.	Mixed (Poor / Fair)
Condition of façade	Concrete façade elements likely to be serviceable for a long period. Major barrier to energy efficiency improvement due to thermal bridging. Windows are aged and not expected to meet modern day performance requirement.	Good
Accessibility	Existing stepped access with steep ramp to the main entrance would not comply with Approved Document M. Internal floors can be accessed by lift, but there are restricted areas that can only be accessed by steps throughout (e.g. viewing deck)	Poor
Fire	Fire resistance of the existing concrete frame is likely to be sufficient for similar future use. Steel frame elements appear only to be supporting the roof, which doesn’t usually require fire protection. Should protection be required in future, it is usually possible to apply intumescent paint in-situ.	Good
Internal flexibility	Existing volumes highly inflexible, except for previous mezzanine gym infills - which are in lighter construction but of limited residual value	Poor
Services	Gas-fired heat and power systems coming to the end of useful life. Likely to full scale replacement in near future in any scheme - with a likely need to move to electric led heating to meet LBE net zero targets	Poor
Heritage significance	The existing building does not hold any heritage designation.	Low

Options appraisal

Three options were appraised to help support Ealing to make an evidence-based, holistic decision on whether to retrofit or rebuild the centre.

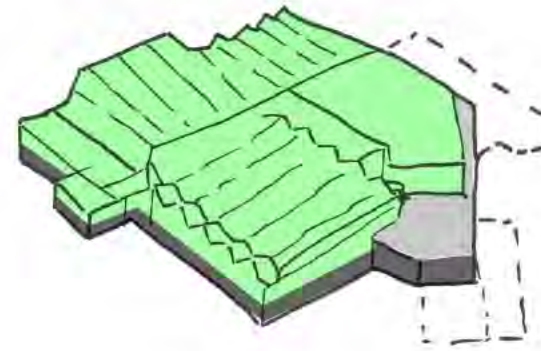


Do nothing

This option is principally reviewed to form a clear baseline for other proposals, and would involve keeping the building running with its existing gas CHP system, and undertaking only the 'wear and tear' repairs needed to keep the building serviceable.

We understand this is not feasible:

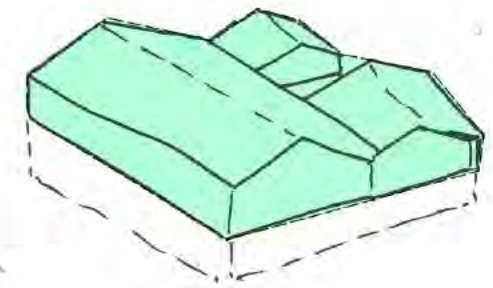
- Ongoing running costs are prohibitive
- Existing gas heating system is running down and is not compatible with a net zero transition
- Roofing elements are moving beyond a 'repairable' condition



Deep retrofit

This option represents an extensive refurbishment to bring the building up to modern standards, assuming:

- Strip back the roof and cladding to the existing frame and replace with improved fabric
- Replace the entire MEP system with an electric system
- Insulate internally to the retained concrete areas
- Targeted demolition and replacement to improve accessibility and connectivity
- Complete internal fit out



Rebuild

This option represents full demolition of the existing centre and rebuild to improve fitness of purpose of the centre and meet or exceed modern standards. Three scenarios were assessed:

1. A typical new build London Plan compliant scheme (with gas)
2. A low operational carbon scheme (all electric)
3. A low whole life carbon scheme (all electric with low embodied carbon construction)

Options appraisal

Whole life carbon

To support the options appraisal, a whole life carbon assessment was carried out to quantify the operational and embodied carbon impact over a 60-year building design life. The whole life carbon assessment has, as far as possible given the early design stage, been carried out in line with LETI's 'Retrofit vs. rebuild: unpicking the carbon argument' guidance from March 2023.

Any carbon assessment at this early design stage is necessarily outline in nature using 'generic' building performance data, rather than an estimation of the impact of developed proposals. The following methodology and key assumptions have informed the study:

1. Operational carbon

Operational carbon emissions of the existing centre were provided by Ealing which suggests a current footprint of around 1385 tCO₂e annually, of which 92% arises from gas usage.

Retrofit proposals that improve the fabric and replace the services for an all-electric heat pump system could achieve between 30-90% in carbon savings, dependent on the level of fabric improvement achieved. It is expected however that a carbon saving of ~65% in the first year of operations would represent a 'best achievable' given the constraints of the existing building (with reductions increasing in time as the electricity grid decarbonises) which has been assessed in the appraisal.

The typical new build option has been assessed using the most up to date available benchmarks for leisure centres which estimates a total energy consumption of 548 kWh/m²/a with a 75% split with gas.

The low carbon options assume an EUI of 250 kWh/m²/a as per the best available best practice benchmarks from the South Cambridgeshire District technical feasibility study and Passivhaus institute recommendations.

All scenarios have been modelled with the Future Energy Scenarios (2022) 'falling short' scenario.

2. Embodied carbon

As built embodied carbon data for new leisure centres is limited and benchmark data does not exist. For estimating purposes, the LETI bands 'office' benchmarks have been used assuming the embodied emissions of a leisure centre rank 1 grade lower than a typical office to account for the additional structural requirements for the pools, more extensive MEP requirements including on-site water filtration and a more extensive fit out with large tiled areas and built in furniture such as lockers.

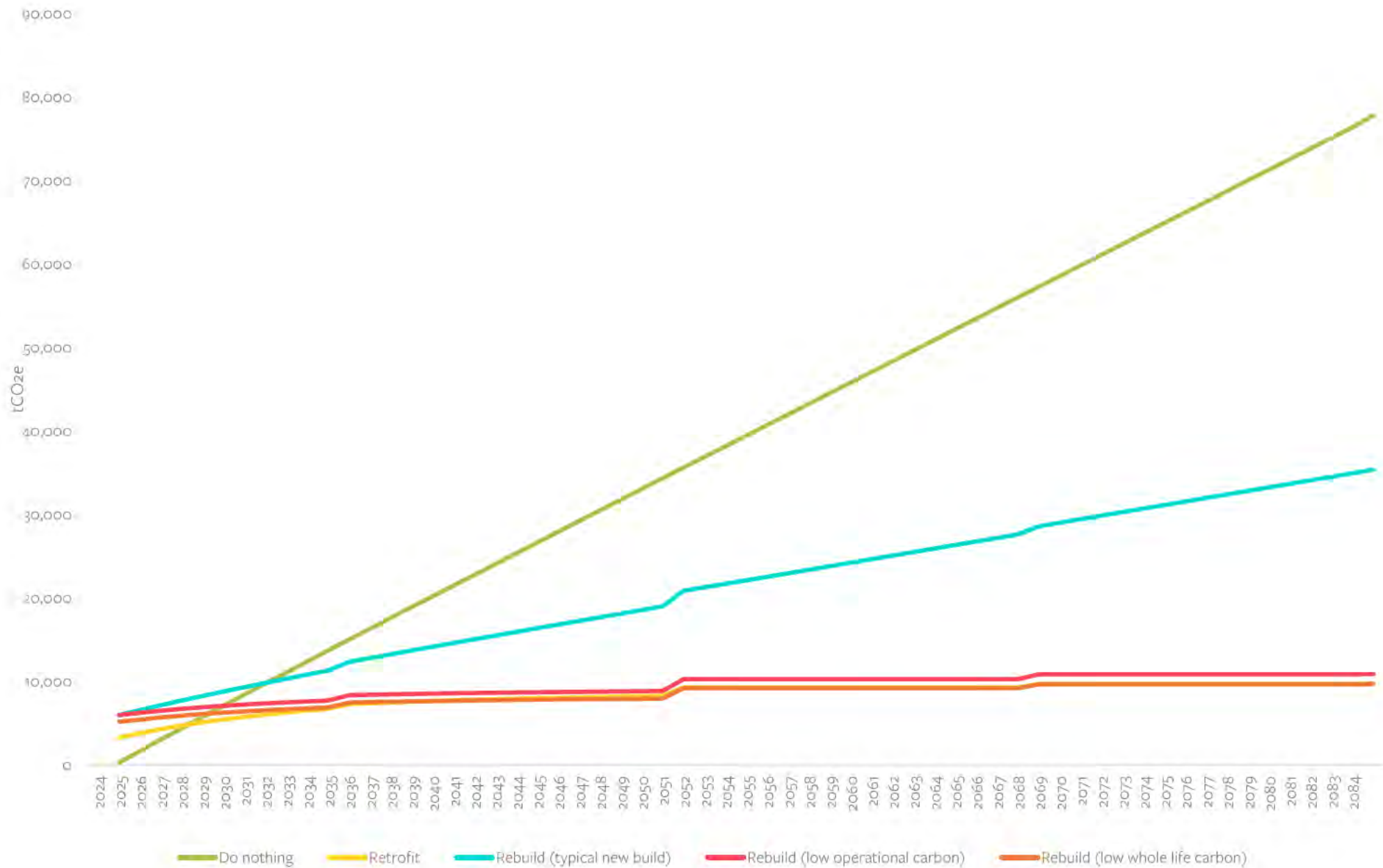
Therefore, the retrofit option is assumed to meet band C (970 kgCO₂e/m²) and the typical new build and low operational carbon new build options are assumed to meet band E (1400 kgCO₂e/m²). It is assumed that with low embodied carbon construction through lean design and integration of natural materials, a band D can be achieved, which has been used to assess the low whole life carbon option.

3. Other assumptions

For comparison purposes, all options are based on the same reference area of 5429m². It is likely that major redevelopment proposals would include a larger footprint and commensurately greater emissions (just as building the same new provision elsewhere would have).

Options appraisal

Whole life carbon



As shown on figure to the left, the current centre as depicted in the **do nothing** option, is the highest carbon option proving the worthiness of pursuing major interventions. It should also be acknowledged that operating the existing centre without major interventions would likely deem the building at its end of life well within the 60-year design life.

The **retrofit** outperforms the rebuild options in upfront carbon, however due to the higher operational energy use, is on par with the **low whole life carbon rebuild** option by 2035.

Importantly, the **typical new build** option, which includes a 75% energy reliance on gas, is significantly higher carbon than the all-electric options, proving the importance of pursuing an all-electric energy strategy.

While the London Plan does not set strict embodied carbon limits or limit the use of natural gas, the study demonstrates that by upholding voluntary good practice limits on operational and embodied carbon, a **low whole life carbon rebuild** can achieve carbon parity with retrofit.

Options appraisal

Holistic assessment

As part of the feasibility study produced for LBE in 2022, the following holistic appraisal was produced by Mikhail Riches, the masterplanning architect and Expedition Engineering.

Key considerations beyond carbon were assessed to determine which option best supports the long-term vision for the Gurnell leisure centre.

This process demonstrates that the rebuild option scores more highly on social and site use metrics for consideration alongside the WLC assessment.

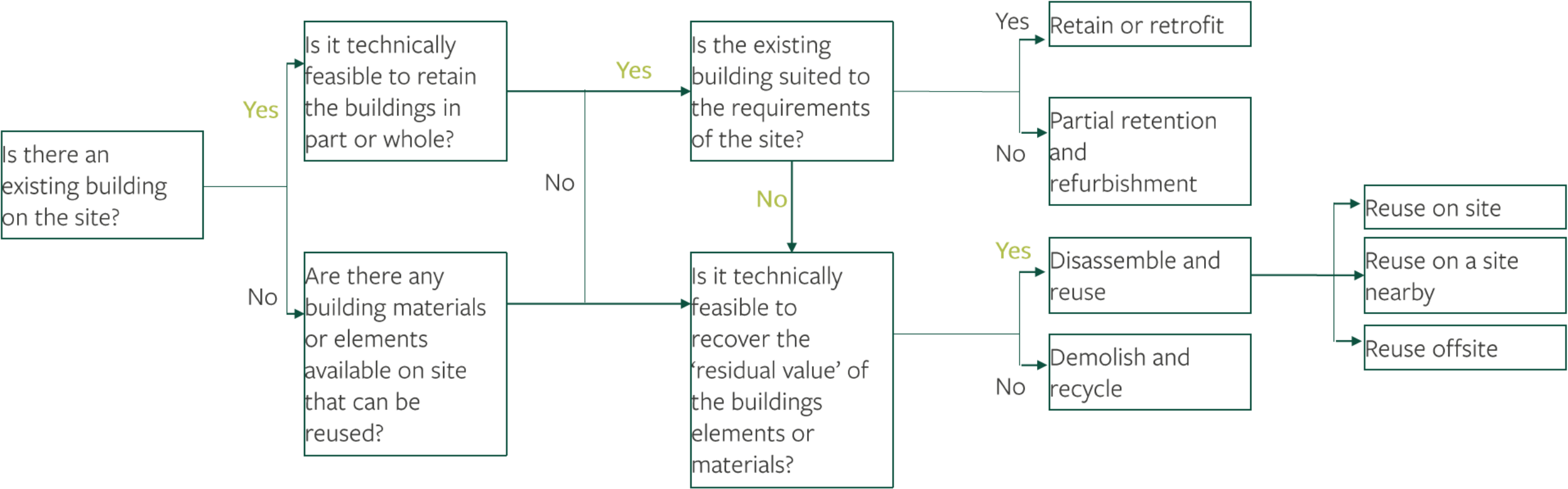
Do nothing	Retrofit	Rebuild
Fitness for purpose Does not meet current space or quality standards. Current centre does not meet modern leisure needs Accessibility Limited accessibility and doesn't provide facilities for all ages, needs and abilities Flexibility Existing structure and space planning difficult to adapt to modern needs Revenue generation Required a £400k subsidy from the council to keep operating prior to closure Operating cost Prohibitively high operating and energy costs Maintenance cost At time of closure, there were circa £200k essential maintenance costs to remain open Timescales Following essential maintenance and repairs, the centre could reopen for users sooner than the other options Capital funding Would require some investment to carry out essential maintenance and repair to reopen Operating carbon Highly inefficient with an annual operating footprint of approx. 1400 tCO2e Embodied carbon Roof in poor condition and finishes are tired requiring substantial material upgrades Lifespan The centre is at its end of life without significant works or upgrades	Fitness for purpose Even with significant upgrades, unlikely to meet current space standards and would limit modern leisure needs upgrades Accessibility Difficult to achieve inclusive design with existing layout and structure Flexibility Existing structure and space planning difficult to adapt to modern needs Revenue generation Revenue opportunities would be improved with improved facility Operating cost Operating costs would be reduced due to improvements to the fabric Construction cost To achieve parity with the rebuild, similar investment is expected Timescales The works could see a programme benefit, however at increased risk due to high level of unknowns Capital funding Enabling development still required Operating carbon Operational carbon would be significantly reduced by electrifying the energy system Embodied carbon Significant upgrades to improve fabric efficiency and bring building up to modern standards Lifespan Warranties for refurbishments can be difficult to define and will typically only provide 10-15 years	Fitness for purpose Exemplar types of spaces and quality Accessibility Purpose built to provide accessibility and inclusivity for all users Flexibility New structure and layout can be designed to future proof the centre for changing needs Revenue generation Good opportunity for revenue generation for the borough with diversity of facilities Operating cost A low energy centre with a thoughtful maintenance strategy would significantly reduce operating costs Construction cost A new build centre would be the most costly alternative Timescales A new centre would have the longest delivery programme Capital funding Enabling development required Operating carbon Highly efficient low energy all electric centre could significantly reduce operating carbon by 75-90% Embodied carbon Significant embodied carbon associated with new construction unless targets imposed Lifespan Design life of 60 years

Conclusions

The pre-redevelopment audit concludes that it is technically feasible to retain and refurbish the existing centre, albeit at the expense of providing a holistically sustainable centre that can meet the current and future needs of the borough. The audit additionally demonstrates that if a strong commitment is made to a lean and low carbon new build design which maximises natural and re-used materials, and goes beyond minimum planning requirements, such a scheme will offer the greatest opportunity for carbon reduction.

This audit demonstrates that the existing leisure centre is deemed not suitable for meeting the requirements of the site and is therefore recommended to be carefully disassembled and reuse to maximise residual value of the existing elements and materials. The disassembly and reuse strategy should be informed by a pre-deconstruction audit, and upheld by good practice circular economy targets such as the GLA’s pioneering project targets.

Further, to mitigate and offset the emissions associated with demolition, it is necessary that the project adopt voluntary good practice targets on embodied and operational carbon in order to uphold the commitment to maintaining within the existing centre’s carbon limits as summarised in this audit.



Subject: Confirmed: Gurnell Leisure Centre Site
Location: Microsoft Teams Meeting

Start: Thu 28/03/2024 11:00
End: Thu 28/03/2024 13:00
Show Time As: Tentative

Recurrence: (none)

Meeting Status: Not yet responded

Organizer: Pre-applications
Required Attendees: [REDACTED] [REDACTED] [REDACTED] Energy Officers; SpatialPlanning@tfl.gov.uk;
Urban Design Team; [REDACTED]; [REDACTED] [REDACTED]
Optional Attendees: [REDACTED] [REDACTED] tibbalds.co.uk

Dear all,

This meeting has been confirmed by the agent. Please contact your case officer, [REDACTED] [REDACTED] if you have any queries.

GLA reference number: 2024/0106/P2I

Site name: Gurnell Leisure Centre Site

Address: Gurnell Leisure Centre site, Ruislip Road East, London, W13 0AA London Borough of Ealing

Local Planning Authority: Ealing

Proposal: The proposed development seeks to replace the existing dilapidated Gurnell Leisure Centre which is no longer in use with a new leisure centre with enabling residential development. To summarise, the proposals are made up of the following core elements: • Demolition of the existing leisure centre and redevelopment of a new leisure centre. • Development of circa 300 new homes (including a target of 35% affordable housing measured by habitable rooms subject to viability) • Landscaping and parkland improvements including play facilities such as a skatepark, pump track, outdoor gym etc.

Case officer: [REDACTED] [REDACTED]

Kind regards
[REDACTED]

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Welcome to the GLA's Team's Meeting

Enabling residential development site – Gurnell Leisure Centre car park

Pre-submission briefing note – Financial Viability (February 2024)

Purpose

Savills (UK) Ltd (“Savills”) has been appointed by the London Borough of Ealing Council (the “Applicant”) to provide financial viability advice in relation to the emerging pre-application proposals for residential-led enabling development in support of the future redevelopment of the Gurnell Leisure Centre. The subject Site is the car park for the existing Leisure Centre, which closed in 2020, and is accessed from Ruislip Road East.

The purpose of this statement is to support ongoing discussions with the LB Ealing’s planning team on matters related to the financial performance of the pre-application scheme, specifically in relation to requirements associated with affordable housing and other financial obligations sought.

The findings presented in this statement will ultimately inform the preparation of a Financial Viability Assessment (“FVA”) in support of the Planning Application, which will respond fully to policy requirements established within the Council’s Local Plan and the Greater London Authority (“GLA”) London Plan for the release of Metropolitan Open Land / Public Sector Land for development.

Emerging Appraisal of Application Scheme

Our work to date has focused upon testing various design iterations that have been produced by the Applicant’s retained architects, Mikhail Riches. Through a detailed assessment of commercial and design factors, the emerging pre-application scheme has been arrived at, which assumes delivery of 295 residential dwellings across two courtyard buildings ranging between 4-6 storeys on the southern half of the Site, and four villa buildings ranging between 6-10 storeys on the northern half.

The starting point for our assessment has been a policy-compliant 50% affordable housing provision (nil grant). On instruction of the Applicant we have subsequently appraised the viability of the project on the basis of alternative proposals assuming 50% affordable housing (assuming grant allocated against additionality above 20% affordable housing), 35% affordable housing (nil grant and with grant on same basis) and a 20% affordable housing scenario. Our general starting point has been to model an affordable tenure mix reflecting 60% Social Rent / 40% Shared Ownership housing. The proposed tenure mix is presented in the following table:

Indicative Proposed Tenure Mix	50% Affordable	35% Affordable	20% Affordable
Social Rent	84	63	35
Shared Ownership	57	35	21
Private	154	197	239
Total	295	295	295

The project is currently modelled to come forward across a c.3-4 year construction programme, reflecting an indicative delivery timescale based upon current market conditions. The illustrative proposals assume affordable tenures will be concentrated in the courtyard blocks, with private sales focused in the villa blocks where value premiums may be achieved to support wider project viability.

Our working approach has been to break down the modelling into respective tenures to be delivered within individual blocks within each phase, to enable a granular approach to analysing financial performance.

Our emerging appraisal demonstrates a breakeven (nil) Residual Land Value (“RLV”) being presented by the proposed scheme on the basis of delivering 35% affordable housing with grant allocated to units above an initial 20% nil-grant provision.

The following table summarises the key inputs reflected in our emerging work:

Residual Land Valuation – Pre-Application Scheme – 35% Affordable Housing with Grant

Input	Assumption	Notes
Development Mix		
Private Sale	197	35% affordable provision by habitable room
London Shared Ownership	35	
Social Rented	63	
Total Residential Units	295	
Income		
Private Sale	£735 psf	All values presented on current day prices
London Shared Ownership	£451 psf	
Social Rented	£210 psf	
GLA Grant	£6.0m	SR grant - £200,000 p/u, applied to 27 homes SO grant - £40,000 p/u, applied to 15 homes
Costs		
Construction costs	£330 psf	Cost plan prepared by Gleeds. £per sqm cost reflecting block type and tenure, inclusive of landscaping, servicing and utilities, contingency and OHP / prelims.
CIL / S106 Contributions	£3.9m	Assumed holding figure of £8,000 per unit, STC. CIL calculations advised by Gleeds.
Planning & DM Fees	8.0% of works cost	
Disposal Fees	2.75% of GDV (includes 0.25% Legal fees)	
Finance	8.0% cost of funds	
Developer Return Requirement	Blended 15.00% on GDV	17.0% on private sale GDV 6.0% on non-spec GDV (exc. Grant)
RLV	c. £0	

Utilising the above assumptions, the current day cost/value approach for this tenure mix scenario generates a Residual Land Value (“RLV”) of c. £nil.

Subsequent scenarios generate the following RLVs:

- 50% affordable (nil grant) – negative RLV -£14.8m
- 50% affordable (£11.6m grant, equivalent to 30% additionality) – negative RLV -£1.8m
- 35% affordable (nil grant) – negative RLV -£6.98m
- 35% affordable (£6.0m grant, equivalent to 15% additionality) – positive RLV £0
- 20% affordable (nil grant) – positive RLV £1.4m

The pattern of RLVs presented above demonstrates the importance of grant funding support to address negative land value, alongside the pattern of value associated with introducing higher proportions of private sale housing into the project.

Comparison with previous design options

As mentioned above, the application scheme has been subject to intensive design review amongst the Council's project team. Savills have appraised a number of design options which considered lower building heights and development densities.

We originally reviewed a 200-unit design option through which storey heights were capped at 6 storeys. Our analysis indicated a negative RLV of c. -£14.8m assuming a 35% affordable housing provision (nil grant).

Maintaining building heights but introducing a more efficient unit mix enabled the provision of 226 homes. This drove a negative RLV of c. -£13.5m (nil grant) / c. -£8.8m (with grant).

Increasing maximum building heights to 7 storeys resulted in the provision of 248 homes. Our analysis indicated a negative RLV of c. -£7.7m (with grant).

Our analysis has pointed to a direct correlation between increasing storey heights and ability to move towards overcoming a challenging economic viability position for the project. This has been a key driver for the application scheme as presented.

Benchmark Land Value

As part of our assessment, it is essential to consider the appropriate Benchmark Land Value ("BLV") which should be adopted as competitive return to landowner, a central tenet of the planning viability assessment as established in national and local policy.

For the purpose of assessing BLV it is necessary to consider the requirement for the Council to realise a material land value receipt to support the delivery of the future Gurnell Leisure Centre. This forms a fundamental principle which will otherwise support the release of this Site as enabling residential development, given its current status as Metropolitan Open Land. We remain in discussion with the Council regarding the specific capital receipt that would be required to be generated through any future disposal. However this does serve as a unique circumstance which justifies a departure from a more typical approach to assessing BLV which would otherwise focus upon consideration of Existing Use Value ("EUV").

Conclusions

Our emerging analysis assesses the financial challenges associated with the Applicant's objective to deliver the significant contributions in terms of affordable housing and financial statutory contributions, which are currently profiled to exceed £3.9 million in CIL and Section 106 contributions.

The Applicant is committed to delivering 35% affordable housing through the future development of the Site, subject to a necessary grant allocation being available to subsidise delivery of affordable housing above a baseline nil-grant 20% provision.

On this basis our analysis suggests the Site generates a Residual Land Value ("RLV") of c. £nil.

Whilst the BLV position remains to be determined, it is necessary to account for the Site's current status as MOL and the necessary requirement for the Council to generate a material land receipt from future disposal. As such our analysis to date indicates that the proposed tenure mix is technically unviable. This leads us to conclude that the project will be unable to provide any additional affordable housing beyond that already proposed.

Clearly any additional S106 financial contributions will negatively impact financial performance which as demonstrated above the project simply cannot bear based on the current reported viability position.

Whilst the purpose of this note is to outline the current direction of travel with respect to the financial viability analysis undertaken, we stress that this continues to be an evolving exercise and our final



recommendations will be subject to adjustment as various development and financial assumptions are refined and crystallised ahead of submission of the FVA in support of the Outline Planning Application. The FVA will be prepared in line with all relevant national, regional and local planning policy and technical guidance, presenting an objective, evidence-based assessment of the financial performance of the application scheme. We expect to engage robustly with the Council's planning officer team and external advisors post-submission of the FVA to reach agreement upon the performance of the project and maximum provision of affordable housing and other financial obligations that can be supported.

Appendix

Summary Financial Appraisal – Pre-Application position – Draft & STC

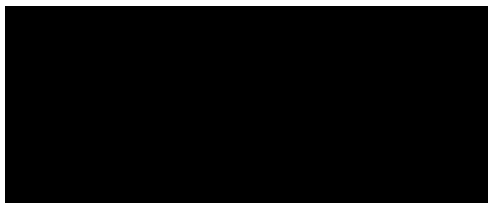
Ealing Design Review Panel

Report of Formal Review: Gurnell Leisure Centre

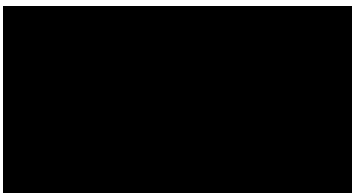
Tuesday 7 November 2023

Via video conference

Panel



Attendees



London Borough of Ealing
London Borough of Ealing
London Borough of Ealing
Frame Projects
Frame Projects

Confidentiality

This is a pre-application review, and therefore confidential. As a public organisation Ealing Council is subject to the Freedom of Information Act (FOI) and, in the case of an FOI request, may be obliged to release project information submitted for review.

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1. Project name and site address

Gurnell Leisure Centre site, Ruislip Road East, London, W13 0AA

2. Presenting team



Mikhail Riches
Mikhail Riches
Mikhail Riches
GT3
GT3
GT3
Periscope
Expedition
London Borough of Ealing
London Borough of Ealing
Tibbalds
Tibbalds
ITP

3. Planning authority briefing

The site is 13.2 hectares, of which about four hectares is projected to accommodate built development, with 1.42 hectare of that accommodating new buildings. The proposals are for demolition of all existing buildings and the erection of a replacement leisure centre (Use Class D2), facilitating development of affordable and market housing (Use Class C3, circa 200 dwellings), leisure centre coach and car parking, vehicular and pedestrian access and associated highway works, new and replacement play space, public realm, landscape and associated ground works to the existing park/public open space. A previous application, including 599 units of affordable and market housing, was refused permission in May 2021.

Officers would welcome the panel's comments on the appropriateness of the proposed heights and massing, the effectiveness and efficiency of the scheme layout, and the relationship of the buildings to Gurnell Park. Comments are also sought on the approach to improvements to the parkland itself and the effectiveness of interventions to open up routes through and into it.

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4. Design Review Panel's views

Summary

The panel thanks the design team for presenting their proposals at an early stage in the development of a complex scheme. The initial work is encouraging but significant issues around layout and connections still need to be resolved. Underpinning these is the need for clarity about for whom the new centre is intended: whether it is simply a 'destination', regional sports facility, or also a resource to support the health and wellbeing of local residents.

Bringing the park to the street is a positive aspiration but greater generosity of space will be required to allow for both physical and visual connections. Further thought also needs to be given to integrating the centre with its landscape setting. The internal arrangement of the centre could be developed to create a better relationship between its uses and its surroundings, including the way the building presents itself to Ruislip Road. The approach to the design of the park should create appealing spaces that feel intimate and comfortable. However, the proposed woodland character demands greater attention be paid to legibility and wayfinding, to encourage visitors to move into and through it. A more strategic approach to onward connections, including to neighbouring green spaces, would be beneficial. While the scheme layout has largely been determined by the existing arrangement on site, the design team should revisit the design to ensure that the scheme is as efficient as the constraints allow. Finally, the panel feels that this scheme should be an exemplar, both in terms of environmental performance and inclusive design, and robust targets and mechanisms to deliver this should be put in place now.

Scheme layout

- The panel understands that the proposed location of the buildings is largely determined by the current arrangement on site but it feels that this does not result in a rational or efficient layout.
- In particular, it questions the proposed alignment and orientation of the new leisure centre, which does not effectively address Ruislip Road, and it feels this requires some further consideration.
- Further thought should also be given to the internal arrangement of the functions within the centre, so that the building has the best relationship to its immediate surroundings on each elevation.
- The panel is broadly supportive of the initial approach to the arrangement of the residential blocks.



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Integration of the leisure centre

- The panel questions whether the design intent is simply to create a destination leisure centre or to integrate this facility fully into the neighbourhood and Gurnell Park. Clearly there will be a balance between the two, but clarity about the primary role of the centre should be established.
- While the re-provided centre will necessarily perform a regional function, the panel would like to see a more integrative approach, centred on the concept of a multi-generation health and well-being centre. Greater connection between the buildings and the landscape of Gurnell Park should be prioritised with a more open building that blurs the boundaries between inside and outside.
- Given its raised position and the setback from Ruislip Road, there is a danger that the building could appear closed off from its immediate surroundings. Careful thought should be given to the design and legibility of the entrance, as well as the design of the ramps and circulation, to ensure that these do not create additional barriers between the centre and its surroundings.
- The design team should also seek opportunities to use the exterior of the centre to connect the building to the landscape and the street. For example, a climbing wall could provide a degree of animation and also physically and visually connect activities inside and outside the building.
- Additional external space should be considered, blurring the boundaries between what happens inside the building with the landscape and external facilities.
- The glazed frontage to the main swimming pool may not be the right façade to address Ruislip Road, given that it is likely to be clouded with condensation much of the time.

Public realm and connectivity

- Ensuring that local people are encouraged to make use of the park will be central to the success of the scheme. The panel questions whether the proposals offer enough to achieve this and would like to see further strategic thinking about routes and connectivity into and beyond the park, to encourage visitors to walk through it.
- The green spaces between the residential blocks, with entrances fronting onto them, could work well. However, their hierarchy, detailing and generosity will be essential to their success, both as spaces in themselves and in making visual and physical connections into the park. The through routes in particular could become overloaded and deserve more space.



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- Even if these green ‘fingers’ are expanded to create a more welcoming approach into the park, the panel questions whether Ruislip Road is busy enough to bring in visitors in significant numbers. Opportunities to connect the site to the public golf course and other surrounding green spaces should also be pursued fully.
- The key route between the centre and the western-most residential block is particularly constrained, with only a 1.5m pavement provided. Given the significance of this route, the panel feels that greater generosity is particularly important here.
- The character of these spaces also needs to be clearly defined and differentiated, reflecting the envisaged uses of each. A clearer hierarchy of spaces and routes needs to be established at a strategic level and be reflected in their design.
- The panel further notes that there is some ambiguity between spaces that are public and semi-private, and this should also be addressed.
- The panel would like to see any shared cycle and pedestrian routes carefully detailed, with separate paths where possible, to minimise the potential for conflicts between different users.
- It was also noted that, given the desire to create visual and physical links, that the axial view north along Gurnell Grove seems to terminate at a random elevation of the proposed buildings.

Landscape design

- The panel feels the approach to integrating activity spaces into a forest landscape is promising, creating shade as well as opportunities for discovery.
- While the retention of trees is welcome, the panel feels that the opportunity to design the scheme around landscape has not been taken up sufficiently, and it notes that the proposed layout of the blocks requires the loss of a significant number of trees.
- The panel would like to understand more about the proposed timescale for the proposed new trees to become established. In particular, it questions how feasible it is to provide semi-mature trees within the project budget.
- An assessment should also be made of the implications of having so many trees of the same age introduced to the site.
- Species selection will also be critical if the good intentions for tree cover are to be realised in practice.



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- Water is a meaningful feature of this landscape, given the proximity of the river, and the panel feels that more could be made of this. For example, consideration could be given to including wild swimming opportunities within the park.
- The panel would like to understand the impact of the proposed spoil removal on the existing ecology of the site.

Sustainable design

- The panel feels that this scheme, and the centre in particular, should be designed to be an exemplar, with a lifespan well beyond the 40 years of the existing facility. Ambitious, quantifiable targets for sustainability should be set, and these should inform the design development from the outset.
- The embodied carbon of both demolition and construction should be fully accounted for in a rigorous sustainability strategy.
- The design team should consider targeting a standard such as Passivhaus certification.
- The panel would like to understand how it is proposed to reuse material from the demolition of the existing building, beyond banking for new the new buildings.
- The panel would like to see analysis of the existing ecological footprint of the site, to understand the baseline against which the final scheme can be assessed in terms of biodiversity net gain.

Inclusive and accessible design

- The panel notes that social prescribing is likely to bring a significant number of older people, and those with limiting health conditions, to the leisure centre and park, so these facilities should be designed to be fully accessible.
- The provision of adequate and suitable toilet facilities, in both the centre and the park, should be a priority. This should include Changing Places facilities.
- The scheme should provide sufficient accessible cycling parking, along with accessible play space and walking and running routes.
- Further consideration should be given to the relationship between set down points and entrances to both the leisure centre and the residential blocks.
- The residential blocks themselves should provide generous accommodation across all tenures, to allow for greater accessibility, and consideration should be given to the provision of dementia-friendly homes.



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- An access consultant should be appointed to ensure that the proposals are fully inclusive.

Next steps

- The panel welcomes the opportunity to review the scheme at an early stage and it looks forward to seeing the proposals again, as they develop.



PURCHASE ORDER



Page 1 of 1

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