

GREATER LONDON AUTHORITY

[REDACTED]
(By email)

Our Ref: MGLA141019-4749

11 November 2019

Dear [REDACTED]

Thank you for your request for information which the GLA received on 13 October 2019. Your request has been dealt with under the Freedom of Information Act 2000.

Our response to your request is as follows:

1. GLA Pre-app 15th Feb 2019

- *8 - Estimated that the cost to refurbish the leisure centre would be 80% of cost to demolish and build a new centre. Please confirm whether LBE (or associated companies) provided any evidence of this estimate and if so, please provide this documentation*

The GLA does not hold this information. I understand that the detailed cost studies have been undertaken by Ealing Council – who should be contacted to request copies of these reports.

- *18 - Third party funding - please can you provide all documentation that has been provided by LBW and associated companies in relation to request for funding. If no funding requests have been fund, please confirm this.*

Please note that the GLA does not hold this information. Please contact LB Ealing for this information.

- *27, 28 - Please provide evidence the LBE have demonstrated that the existing sports pitches will be appropriately re-provisioned in the general vicinity*

This evidence would be required/reviewed as part of any future planning application

- *34 - Enabling status of the development - Please confirm what is meant by "enabling status" and the consequence of this development not being verified as an "enabling development"*

Enabling development refers to the potential for other on-site residential use to support the viability of the scheme and provision of a new leisure centre

- *43 - Independent design review of the scheme - Please confirm whether an independent design review has been undertaken and if so, please provide all associated documentation.*

I understand that an independent design review has not been undertaken. LB Ealing are responsible for this undertaking.

2. GLA Pre-app 23rd Mar 2018

- *16 - Please provide a copy of the Alternative Sites Assessment and any related materials or documentation*

The GLA does not hold this information. Please contact LB Ealing for this information.

- *18 - Urban Greening Factor (UGF) assessment - has this been provided, if so please provide a copy mentation.*

This would be submitted as part of a planning application.

- *47 - Technical note from the GLA Energy team - please provide this note.*

Please find attached.

- *58 - Financial Viability Assessment (FVA)- Please confirm whether LBE or associated companies have provided a draft FVA and if so, please provide a copy.*

This would be submitted as part of a planning application. A copy has not been provided to the GLA.

3. Additionally:

- *Building Council Homes for Londoners funding - Please confirm how much funding has been allocated to this scheme by the GLA and provide any related documentation*

There is currently no funding allocated to this project.

If you have any further questions relating to this matter, please contact me, quoting the reference at the top of this letter.

Yours sincerely


Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at:

<https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information>

Appendix 1 – GLA Energy Team Comments

Gurnell Leisure Centre

- The updated *GLA Energy Assessment Guidance* provides details on the information that should be provided within the energy assessment to be submitted at stage 1. See link for the latest guidance published in October 2018: <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>
- The following targets are in effect for all Stage 1 schemes received by the Mayor as set out in the guidance:
 - **Residential** – Net zero carbon with at least an on-site 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations.
 - **Non-residential** – 35% reduction in carbon emissions beyond Part L of 2013 Building Regulations. The zero carbon target will apply to non-domestic developments when the new London Plan is adopted (expected in late 2019).
- The carbon emission figures have been reported against a Part L 2013 baseline and have been reported separately for domestic and non-domestic elements of the development. This is in line with the GLA's expectation.
- From January 2019, and until central Government updates Part L with the latest carbon emission factors, applicants are encouraged to use the SAP 10 emission factors for referable applications when estimating CO₂ emission performance against London Plan policies. A spreadsheet has been provided for this purpose and should be used to present the development's performance. Applicants will still need to provide an assessment of CO₂ performance using SAP 2012 emission factors to enable a comparison to be made. Applicants proposing to only use SAP 2012 emission factors will need to provide a robust justification for this.

Be Lean Demand Reduction

- The applicant should commit to meeting Part L 2013 by efficiency measures alone as a minimum for both domestic and non-domestic elements separately. Applicants should note the new draft London Plan Energy Efficiency targets which set out the GLA's expectation for levels of improvement achievable for new developments:
 - **Residential** – 10% improvement on 2013 Building Regulations from energy efficiency
 - **Non-residential** – 15% improvement on 2013 Building Regulations from energy efficiency
- Sample SAP full calculation worksheets (both DER and TER sheets) and BRUKL sheets including efficiency measures alone should be provided to support the savings claimed.
- Information on the development's total energy demand (MWh/year) for each building use and the total Part L Fabric Energy Efficiency Standard (FEES) should be reported.

Cooling and Overheating

- The domestic overheating checklist, included in the Energy Assessment Guidance, should be completed at pre-application stage and used to identify potential overheating risk and passive responses early in the design process.
- Evidence should be provided on how the demand for cooling and the overheating risk will be minimised through passive design in line with the Cooling Hierarchy. Dynamic overheating modelling in line with CIBSE Guidance should be carried out both for the leisure centre (TM52 for all TM49 weather files) and the residential units (TM59 for all TM49 weather files). The applicant should submit a detailed overheating report rather than just the results of the analysis.
- The area weighted average (MJ/m²) and total (MJ/year) cooling demand for the actual and notional building should be provided and the applicant should demonstrate that the actual building's cooling demand is lower than the notional; the current information provided shows the opposite. Moreover, and based on the BRUKL files submitted, there also seem to be concerns on the Criterion 3 compliance. Both of these issues should be addressed.
- A Cooling efficiency of 8 has been used in the leisure centre's model; manufacturer's evidence should be provided to demonstrate that this challenging performance is indeed achievable.

Be Clean Heating Infrastructure

- The applicant has investigated opportunities for connection to nearby existing or planned district heating (DH) networks. Evidence of communication with the relevant parties (i.e. local authority energy officers) should be provided to demonstrate that this option has been fully investigated.
- The site should be served by a single energy centre and the applicant should commit to providing a site wide heating network where all buildings/uses on site will be connected; relevant drawings/schematics for the energy centre and the site-wide network should be provided.
- The applicant should provide information confirming that the development is future proofed for connection to wider district networks now or in the future.
- The current strategy proposes a CHP-led energy centralised. In line with the above comments and the new GLA Energy Assessment guidance, the applicant should confirm that, prior to the consideration of the CHP, all other heating options have been thoroughly investigated for their suitability. It should be robustly demonstrated that the proposed CHP is indeed the optimum heating solution for the site, otherwise a more suitable technology should be put forward. Should CHP be proposed, applicants will be expected to provide sufficient information to justify its use and ensure that the carbon and air quality impact is minimised. See Appendix 3 of the Energy Assessment Guidance (October 2018) for further details. It should be noted that gas-engine CHP is not supported for small/medium developments.
- Information on the anticipated heating loads and profiles for all uses on site should be submitted (MWh p.a.)

Be Green Renewable Energy

- The GLA expects all major development proposals to maximise on-site renewable energy generation. This is regardless of whether the 35% on-site target has already been met through earlier stages of the energy hierarchy.
- Solar PV is currently proposed and should be maximised. A plan showing the proposed location of the installation should be provided and the applicant should demonstrate that the roof's potential has been maximised for the installation.

Carbon Offsetting

- Applicants are expected to maximise carbon emission reductions on-site. Where it is clearly demonstrated that no further carbon savings can be achieved but the site still falls short of the carbon reduction targets, applicants are required to make a cash-in-lieu contribution to the relevant boroughs' carbon offset fund using the boroughs' carbon offset price.
- Energy strategies should provide a calculation of the shortfall in carbon emissions and evidence of discussions with the borough agreeing the offsetting approach.

Monitoring

- The energy strategy should include information on how the building's energy performance will be monitored post-construction to enable occupants to monitor and reduce their energy use.


Senior Policy and Programme Officer, Environment