

Cc: 'planning@ealing.gov.uk' <planning@ealing.gov.uk>

Subject: Hydraulic Modelling Study Report - Gurnell Leisure Centre 201695FUL

Importance: High

Dear [REDACTED]

We've recently been consulted on a planning application for the redevelopment of Gurnell Leisure Centre. I understand from reviewing the Flood Risk Assessment (FRA) by Parmabrook submitted with the application that a detailed hydraulic modelling report has been undertaken to support the assessment of flood risk. Whilst Appendix F of the FRA shows the resulting flood modelling maps, and section 6.8 makes reference to the 'Hydraulic Modelling Study report' we do need to see the full hydraulic modelling report itself to understand how the conclusions have been reached, and this doesn't appear to have been appended to the FRA, or listed as a separate document. I will need to send this report to our Evidence and Risk team who review detailed flood models for us.

Can the Hydraulic Modelling Study report be sent to me as soon as possible please? The sooner the better as this will impact on how soon we can send our comments back to Ealing Planning team.

If the report is quite large it might be best to download it to our Sharefile at <https://ea.sharefile.com/r-r8dc70e0966e489ca>

If you have any questions feel free to contact me, details below.

Kind regards
[REDACTED]

[REDACTED]
Planning Specialist, Hertfordshire and North London Sustainable Places
Environment Agency | Alchemy, Bessemer Road, Welwyn Garden City, Hertfordshire, AL7 1HE

[REDACTED]

Mr [REDACTED]
Planning Services
Ealing Council
14-16 Uxbridge Road
London
W5 2HL

Our ref: NE/2020/131922/01-L01
Your ref: 201695FUL
Date: 1 September 2020

Dear [REDACTED]

Demolition of all existing buildings and erection of replacement leisure centre (Use Class D2), facilitating affordable and market housing residential development (Use Class C3) in 6 blocks, flexible retail floorspace (Use Classes A1 - A3), plant room and energy centre, leisure centre coach parking, basement residential and leisure centre cycle and car parking, refuse/recycling storage, new servicing, vehicular and pedestrian accesses and associated highway works, new and replacement play space, public realm and public open space, landscaping and associated ground works to existing public open space.

Gurnell Leisure Centre, Ruislip Road East, West Ealing, London, W13 0AL

Thank you for your letter dated 4 June 2020. Our apologies for the delay in responding to this application.

This application lies within Flood Zone 3a and in close proximity to Flood Zone 3b, which is land defined by the planning practice guidance (PPG) as having a high probability of flooding. In the absence of an acceptable Flood Risk Assessment (FRA) and supporting flood model we **object** to this application and recommend that planning permission is refused.

Reason:

The hydraulic flood model by Weetwood which underpins the FRA has some significant issues that need to be addressed. In particular, we are unable to verify the 1d channel and structure data for locations at/near to the site and as such there is uncertainty on the level of flood risk the flood model data represents. As a result, we are currently unable to fully assess the impact of the proposed development on flood risk or the flood mitigation measures such as the compensatory flood storage. Therefore, the submitted FRA does not adequately assess the development's flood risks in compliance with Policy 5.12 of Ealing's Development Management DPD (2013). The FRA does not currently comply with the requirements for site-specific flood risk assessments, as set out in paragraphs 30 to 32 of the Flood Risk and Coastal Change section of the Planning Practice Guidance.

Overcoming our objection:

To overcome our objection, the applicant should address the issues raised in our technical review on the hydraulic flood model. The FRA may also require updating based on the revisions to ensure this compliments the findings of the revised hydraulic flood model. This should demonstrate there is no increase in flood risk caused by the proposed development.

If this cannot be achieved, we are likely to maintain our objection. Please consult us on any revised hydraulic model and FRA.

Advice to applicant

Hydraulic flood model

We enclose the full model review for the applicants attention. In summary the issues with the flood model are set out below but the applicant is advised to read the full review.

It is acknowledged the Weetwood model shows a good match with our Brent model in terms of baseline flood outlines and level comparisons. However, our Brent model is a catchment model, therefore end use and interpretation in its unmodified, 'as-supplied' state needs to be commensurate with that level of build scale. We require proof that the relevant portion has been checked as suitable for use at site-scale. The fact that we have issued the model does not guarantee it's suitability for use in an FRA, it's intended to be a starting point for refinements proportionate to the scale and type of proposed development. We require this level of modelling due diligence from all applicants.

The truncated version of the model has been used as a base to support an FRA for a large development involving land-raising and compensatory storage in Flood zone 3, while also in very close proximity to Flood zone 3b.

The main concern is that, in this review, we are currently unable to verify the 1d channel and structure data for locations at/near to the site.

Please address the red comments flagged in our review to ensure the accuracy of the 1d components of the model for the reach through the site and on reach approaches/exits by:

1. Obtaining a copy of the original survey from the Environment Agency, then comparing it with the appropriate sections and culvert structures currently in your revised model (if not done so already).
2. Some of the 1d sections have been extended using LiDAR (this may have been present in the existing EA Brent model) and therefore we have uncertainty on accuracy of crest levels running along the northern site edge, these need checking. We notice you have a topographic survey which may assist here.
3. There also seems to be accuracy issues with section lengths in the inactive zone of the 2d domain for the reach adjacent to site (please see review comments on 1d-2d linking).

Please provide the sensitivity runs for the blockage scenarios mentioned in the report and conduct a standard -/ 20% sensitivity on Mannings. A desktop assessment indicates backwater effect would extend 2-3km upstream from the Brent tidal gates which utilise an extreme tidal boundary water level in the model, so the requirements for a downstream boundary sensitivity is not required at this location.

Advice to local planning authority

Sequential test

In accordance with the National Planning Policy Framework (paragraph 158), development should not be permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding.

It is for the local planning authority to determine if the sequential test has to be applied and whether or not there are other sites available at lower flood risk. Our flood risk standing advice reminds you of this and provides advice on how to apply the test.

In accordance with the National Planning Policy Framework, the proposed development is

appropriate provided that the site meets the requirements of the exception test. Our comments on the proposals relate to the part of the exception test that demonstrates the development is safe. The local planning authority must decide whether or not the proposal provides wider sustainability benefits to the community that outweigh flood risk.

Decision

If you are minded to approve the application contrary to this advice, we request that you contact us to allow further discussion and/or representations from us in line with the Town and Country Planning (Consultation) (England) Direction 2009.

In accordance with the planning practice guidance (determining a planning application, paragraph 019), please notify us by email within two weeks of a decision being made or application withdrawn. Please provide us with a URL of the decision notice, or an electronic copy of the decision notice or outcome.

Should you require any additional information, or wish to discuss these matters further, please do not hesitate to contact me on the number below.

Yours sincerely


Planning Specialist



[REDACTED]

From: [REDACTED] <[REDACTED]@ealing.gov.uk>
Sent: 24 August 2020 16:18
To: [REDACTED]
Subject: FW: Planning application ref 201695 FUL - Gurnell Leisure Centre, Objection from Save Gurnell Community Group
Attachments: Gurnell Objection (REF 201695FUL) v2.0.pdf

FYI.
[REDACTED]

From: [REDACTED]
Sent: 29 July 2020 14:18
To: [REDACTED] <[REDACTED]@ealing.gov.uk>; Planning <Planning@ealing.gov.uk>
Subject: Planning application ref 201695 FUL - Gurnell Leisure Centre, W13 0AL. Objection from Save Gurnell Community Group

Dear Mr. [REDACTED]

Please find attached the detailed objection document from the Save Gurnell Community Group.

This objection is in relation to Planning application ref 201695 FUL - Gurnell Leisure Centre, W13 0AL.

We have submitted a summarised objection via the portal, however for the avoidance of doubt, the attached document is our formally submitted objection.

Please can you confirm receipt of this email and document.

Kind regards,
[REDACTED]

Planning Application Objections

Gurnell Leisure Centre 201695FUL and BMX cycle track 201541FUL

Prepared by Save Gurnell
7-29-2020

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1. EXECUTIVE SUMMARY

This document sets out the arguments and evidence for:

- The refusal of the planning application for Gurnell Leisure Centre, which is a Major Departure application and on Metropolitan Open Land (MOL). The application seeks to demolish the existing leisure centre, rebuild a new one and an extremely dense, tall, and bulky residential development on the footprint of the current car park.
- The refusal of the planning application for the BMX cycle track, ancillary buildings, and lighting. This site lies within the application boundary of the Gurnell proposals, and strategically is part of the leisure centre redevelopment but has been submitted under its own planning application. It will destroy a Site of Importance for Nature Conservation (SINC) Grade 1 and several assessments do not take this into consideration.

Both applications are to be determined by the London Borough of Ealing.

These are as follows:

- 1.1 The Screening Decision for the Environmental Impact Assessment (EIA) was carried out in December 2018 and concluded that an Environmental Statement was not required. Flaws in the screening process and recent developments mean that EIA is now required, and an Environmental Statement should be produced.
- 1.2 The council's justifications for the project are flawed as a result of not producing a Business Case. The options were not properly examined, the project has been misguided and the true needs of the community have not been considered.
- 1.3 The council have also taken on significant risk during the course of the project, which has gone from being cost neutral and with the developer carrying all the risk to the council being responsible for the leisure centre and affordable housing build. Additionally, the private residential development is now a facilitating development rather than an "enabling development" as it will only partially fund the leisure centre build. The affordable housing is funded separately by GLA grant.
- 1.4 The cost for the proposed leisure centre is significantly higher than similar projects and there are only marginal improvements in facility mix over the current leisure centre. This represents extremely poor value for money for a major community asset.
- 1.5 The Financial Viability Assessment (FVA) concluded that the scheme is not viable. This further demonstrates that this proposal should not be pursued.
- 1.6 The council claim that the leisure centre will be shut down if this project does not go ahead, however, evidence suggests that this behaviour is more likely associated with the sunk cost fallacy.

- 1.7 The Planning Statement for Gurnell sets out the reasons for allowing this inappropriate development to be built on MOL and has concluded that “very special circumstances” apply and that the harms to MOL and other potential harms are outweighed by the benefits. Their reasons and justifications are examined in this document.
- 1.8 For the benefits, the applicant has provided opinions and conclusions based on the assessments that have been carried out. Inaccurate assessments have generated unsound conclusions. and opinions. Also, certain opinions made by the applicant such as “substantial design benefits” are unfounded due to hundreds of public objections highlighting the poor design and architecture.
- 1.9 This development will result in substantial harm to and erosion of the MOL. Significant other harm will also be caused, and the benefits of this development do not clearly outweigh the harm caused
- 1.10 Taking into consideration all the shortcomings highlighted in this document, aside from the unviability and poor value for money arguments, there is a very strong case that these application should not be granted and the project should not continue in its current form. The recommendations have been summarised in the final section of this document and should be considered immediately by Ealing Council.
- 1.11 London Borough of Ealing is the landowner, Local Planning Authority, and also the applicant in the case of the leisure centre. They are not acting in the best interests of the borough’s residents and is about to make a very costly mistake which will impact them for decades to come. The opportunity to provide a future-proofed facility which meets the needs of the community and offers better value for money will be lost.
- 1.12 If planning consent is granted, there is no turning back from this mistake. It will be too late to stop and reevaluate the options.
- 1.13 Several mistakes have been made in the past however, now is the time for Ealing Council to recognise that a better option can be found which will deliver a high-value leisure centre, maintain it’s very precious MOL and provide a great and healthy place for its residents to live for generations to come.

2. SUMMARY OF THE PROPOSALS

- 2.1 This report covers two planning applications, the replacement Gurnell Leisure Centre in situ (with the addition of residential and retail units) and the relocation of the BMX track to Long Field in the north west corner of the site.
- 2.2 Both Planning Applications sit within the same application site but have been separated. For the purposes of this document we will discuss both applications holistically.
- 2.3 The whole site is designated as Metropolitan Open Land (MOL) and forms part of the Brent River Park - a large linear open space which extends through the Borough. Excluding the leisure centre building itself and the car park the rest of the site is also designated as Public Open Space. The bank of the river is designated as a Site of Importance for Nature Conservation of Borough Importance (SINC) Grade 1 (EaBI14A -Brent River Park: Hanger Lane to Greenford Line) as is the entirety of Long Field. The River itself also forms part of the Blue-Ribbon Network. Although not a planning designation, a public right of way is also established through the west section of the site following the bank of the River Brent.
- 2.4 The London Borough of Ealing is both the landowner and Local Planning Authority for both applications. They are also the applicant in the case of Gurnell (BE:HERE EALING LIMITED is a Joint Venture partnership between Ealing Council, Broadway Living and Eco World International). The applicant for the BMX track is Access Sport.



Application site location and context

Gurnell Leisure Centre - 201695FUL

2.5 Described in the Planning Application as:

“Demolition of all existing buildings and erection of replacement leisure centre (Use Class D2), facilitating affordable and market housing residential development (Use Class C3) in 6 blocks, flexible retail floorspace (Use Classes A1 - A3), plant room and energy centre, leisure centre coach parking, basement residential and leisure centre cycle and car parking, refuse/recycling storage, new servicing, vehicular and pedestrian accesses and associated highway works, new and replacement play space, public realm and public open space, landscaping and associated ground works to existing public open space. Gurnell Leisure Centre Ruislip Road East West Ealing London W13 0AL”

[Link to Planning Application.](#)

2.6 The proposals are a departure from the Development Plan. They are not in accordance with the development plan in force in the area, being a Major Development on land designated as Metropolitan Open Land and comprising public open space.

2.7 Summary of the development:

- Replacement of leisure centre
- 599 residential units across 6 towers (part 6, 10, 13, 15 and 17 storeys)
- Inappropriate development on MOL



Gurnell – overview of the development

BMX cycle track – 201541FUL

2.8 Described in the Planning Application as:

“Construction of a BMX cycle track with 4 x 15m lighting masts; installation of a single storey structure for equipment storage/welfare facilities; associated hard surface, picnic area, bike racks, compost toilet, soft landscaping and vehicle parking. Longfield Playing Fields Stockdove Way Perivale Middlesex UB6 8TJ”

[Link to Planning Application](#)

2.9 **Summary of the development:**

- Relocation and extension of BMX cycle track
- Proposed site sits entirely within the SINC



BMX – plan of the proposed track



Map of the SINC (SINC shown as checker green spaces.)

OVERALL MASTERPLAN

The development is set within a wider masterplan to enhance the landscape of the River Brent, upgrade leisure facilities and enhance ecology and public access. The landscape masterplan for the area significantly increases the diversity of parkland uses

- ① Residential development
- ② Leisure centre
- ③ Parking and service access
- ④ Courtyard garden
- ⑤ Roof garden
- ⑥ Basement parking access
- ⑦ Play area
- ⑧ Skate park
- ⑨ Parkland
- ⑩ Surface Water Attenuation Basin and sculpted 'overland flow' path
- ⑪ Footpath link
- ⑫ Coach bays
- ⑬ Park entry
- ⑭ Proposed pedestrian bridge
- ⑮ Brent corridor (ecological enhancements)
- ⑯ Brent River Park
- ⑰ Wetland scrape areas (habitat creation)
- ⑱ Existing trees(supplemented with new)
- ⑲ Indicative location of BMX track



Masterplan including Gurnell, residential and the BMX track

3. ENVIRONMENTAL IMPACT ASSESSMENT (EIA) – ANALYSIS OF THE SCREENING OPINION DECISION

- 3.1 Environmental impact assessments are required for developments described in schedule 1 and schedule 2 of The Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations.
- 3.2 EIA is an important process as it evaluates the likely environmental impacts of a proposed project or development, considering inter-related socio-economic, cultural, and human-health impacts, both beneficial and adverse.
- 3.3 The Gurnell development is deemed a Schedule 2 development under the regulations. Category 10(b) – Infrastructure projects (b) Urban development projects, including the construction of shopping centres and car parks, sports stadiums, leisure centres and multiplex cinemas.
- 3.4 The Screening Opinion was requested from Ealing Council in 2016 and then again in 2018. On both occasions the decision was taken that an Environmental Statement would not be required.

Link to [December 2018 Screening Opinion](#)

- 3.5 The report states “An EIA is likely to be required on sites that have not previously been intensively developed, and where the site is greater in size than 5ha, or would provide a total greater than 10,000sqm of new commercial floorspace, or would have a significant urbanising effect (e.g. a new development of more than 1,000 dwellings) in a previously non-urban area, or in combination with other existing/approved urban development projects”

Separation of Gurnell and BMX proposals

- 3.6 The existence or approval of other developments can determine whether an Environmental Statement is required of a planning application and what that Environmental Statement should contain.
- 3.7 The High Court has recently clarified how other developments can affect the requirement to provide an Environmental Statement in R (Wingfield) v Canterbury City Council & HNC Developments LLP [2019] EWHC 1975 (Admin).

The following questions were considered in this case:

- Common ownership: where two sites are owned or promoted by the same person, that could indicate that they constitute a single project.
- Simultaneous determinations: where two applications are considered and determined by the same committee on the same day and subject to reports

which cross refer to one another, that could indicate that they constitute a single project.

- **Functional interdependence:** where one part of a development cannot function without another, that could indicate that they constitute a single project.
- **Stand-alone projects:** where a development is justified on its own merits and is pursued independently of another development, that could indicate that it constitutes a single individual project that is not an integral part of a more substantial scheme.

3.8 Applying these “Wingfield factors” to the facts of the Gurnell Leisure Centre and BMX cycle track planning developments:

- **Common ownership** – the entire 13.2ha site is owned by the London Borough of Ealing
- **Simultaneous determinations** – both planning applications have been published for formal public consultation during the same period and will both be determined by the same Planning Committee. Dates for the committee meetings are not confirmed at this stage, however it is likely that they could be determined in the same or subsequent meetings. Additionally, there are multiple reports that cross reference one and other:
 - o Planning Statements
 - o Design and Access Statements
 - o Gurnell preliminary Ecological Assessment used in BMX planning application
- **Functional interdependence** – although there are no functional dependencies between the two proposals, they form part of the same strategic project and one of the objectives of the Gurnell proposals was re-provision the BMX track.
- **Standalone projects** – these two proposals form part of a more substantial scheme both physically and strategically.

3.9 Taking these factors into account, the two projects must be considered together in terms of the EIA process

Size of the site

3.10 The total site is 13.2ha, the report states that only 4ha will be developed (this includes the buildings, ancillary areas, pathways and landscaping) and therefore the 5ha trigger was not met. Given the entire site totals 13.2ha this should have been enough to trigger the EIA alone.

significant urbanising effect of the area, especially given the size, scale and density of the development.

- 3.17 The Screening Opinion was given 18 months ago and since then a significant number of developments have been approved across Ealing, including within the 1.5km radius. Additionally, the number of units in Copley Close has also been uplifted from 204 to 280 units (October 2018). The table below provides an updated list.

DEVELOPMENT	POSTCODE	UNITS
Gurnell	W13 0AL	599
Developments within 1.5km		
Copley Close		280
The Wiltern	UB6 8DW	278
Land adjacent to 5 Central Parade	UB6 8TF	57
Buckingham Avenue	UB6 7RA	40
TOTAL WITHIN 1.5km		1,254
Developments within 2km		
57 Greenford Road	UB6 9BA	83
Castle House and Rome House	W13 9QD	314
TOTAL WITHIN 2.5km		1,651

Updated cumulative development list – June 2020

- 3.18 If the radius is increased to 2.km, which is entirely reasonable, the cumulative development further increase to 2.5km would also capture Greenford Quay (2,118 units), Vanguard Site (100 units), 96-102 Broadway (120 units) amongst others.
- 3.19 Based on the above Information, the EIA should have been triggered due to the environmental impact and the significant urbanising effect of the development both alone and in combination with nearby development.

Environmental factors

- 3.20 The site has previously been used as a Sewage Works and a landfill site – this is acknowledged in several documents:
- Design and Access Statement 1 of 6
 - Planning Statement section 3.12
 - Cabinet Reports
 - Screening Reports
- 3.21 The bank of the river is designated as a Site of Importance for Nature Conservation of Borough Importance (SINC) Grade 1 (EaBI14A -Brent River Park: Hanger Lane to Greenford Line). The entire site of the proposed BMX track is within this SINC. When the Screening Opinion was carried out, the proposed relocation of the BMX track was not factored in and therefore not considered in terms of its impact.

3.22 The site is designated Flood zone 2, 3a and 3b

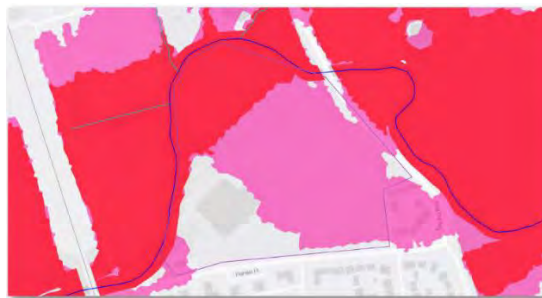


Figure 10 West London SFRA Flood Modelling Showing Flood Plain (<http://westlondonfra.london>)



Figure 9 EA Tidal / Fluvial Flood Map for Planning (Contains OS data © Crown copyright & database right 2018)

Conclusion

- 3.23 The Gurnell and BMX proposals should be treated as one proposal with respect to EIA and therefore the impact of the combined development assessed. The proposed development will have a significant urbanising effect due to its size and scale and in combination effects with nearby developments surpassing the 1,000 unit threshold. Based on reasoning used when the screening decision was made, if the screening opinion were carried out again the EIA process would be triggered. Therefore, our conclusion is that these proposals require the production of an Environmental Statement.

4. JUSTIFICATION FOR THE DEVELOPMENT

- 4.1 There are a significant number of inadequacies in the way this project has been handled by the London Borough of Ealing. This section will outline:
- The fundamental flaw in the initial decision-making process including the choice to demolish the current leisure centre and rebuild rather than refurbish.
 - How this project has been mismanaged by Ealing Council.
 - The fundamental issues with the estimated build costs of the new leisure centre and why this is poor value for money.
 - Why the project will ultimately not meet key objectives and therefore fail to deliver future value due to the new facility not being futureproofed.

Demolition vs Refurbishment – justification of this decision

- 4.2 The proposals for Gurnell were discussed by the Ealing Cabinet in March 2015. It was noted that *“no budget allocation has been made to fund the provision of Gurnell Leisure Centre”*. Despite this, The Cabinet agreed that the council wished to provide *“a flagship water-based leisure facility, which includes a 50m pool”*
- 4.3 An integral part of the justification for demolish rather than refurbish were the *“estimated”* costs:
- £5M to replace the roof, and
 - Total refurbishment would cost 80% of the cost of a new build

These “facts” were highlighted in Cabinet Reports. Public Consultation events and in discussions with the GLA. The Planning Statement states:

“After much detailed work, it was considered prohibitive, inefficient and substantially disruptive in the long run to carry out piecemeal renovation works on the existing leisure facility. Furthermore, such works were calculated to cost around 80% of that of an actual new facility – though with few of the benefits that such a new facility could bring”

Link to [Gurnell Consultation – May 2016](#)

- 4.4 Information was requested (through FOI ref 19/1896) from Ealing Council to evidence their estimate to refurbish the leisure centre. The response was that there was no documented evidence.
- 4.5 The absence of evidence for these estimates is significant given they were used in the decision-making process to prove that new build would be more cost effective than refurbishment.
- 4.6 Additionally, a full Business Case was not prepared which should have included assessments of all the potential options i.e. do nothing, refurbish, build like for like, build enhanced

provision etc. Instead the council decided to go forward with plans to build a “*flagship water-based leisure centre*” which would be “*regionally significant*” and a “*state of the art facility*” despite having absolutely no sinking fund put aside for re-provision of the centre once it reached “*end of life.*”

- 4.7 3DReid were engaged to carry out a feasibility study – they are renowned architects who have worked on Olympic and Commonwealth stadiums. They estimated costs of £30-35M for a leisure centre around 8,195sqm.
- 4.8 The proposed facility mix is outlined in the table below. It is important to note that the public had not been consulted with at all at this stage - the facility mix was determined behind closed doors by the members of Ealing Council.
- 4.9 In the five years that have passed since the original Cabinet decision, not only has the facility mix now significantly decreased from the original design brief, the actual floorspace of the building has increased, filled up with ancillary areas rather than providing an enhanced offering.
- Floor space increased from 8,195sqm to 12,995sqm GIA
 - Fun pool decreased in size
 - Spectator seating decreased from 300 to 200
 - Gym decreased from 140-160 stations to 100+ stations
 - Studio sqm decreased
 - 4-6 court sports hall and climbing wall descoped
 - Soft play sqm decreased
 - Café sqm decreased

AREA	ORIGINAL PROPOSAL (Approved by March 2015 Cabinet)	CURRENT PROPOSAL (June 2020 Planning Application)
TOTAL SIZE GIA	8,195 sqm	12,995 sqm
Pool	50m pool - 10 lanes (increased from 8 lane original brief)	50m pool – 10 lanes
Fun Pool	500 sqm	326 sqm
Seating	300-person spectator	220-person spectator
Gym	140-160 stations	100+ station
Studios	3 studios 540 sqm total	3 studios 490 sqm total
Other facilities	4-6 court sports hall Climbing wall	Sports hall and climbing wall descoped
Party rooms	Not in original brief	57sqm and 58 sqm
Soft Play	320 sqm	237 sqm
Cafe	160 sqm (45-70 covers)	88 sqm
Meeting space	16 – 20 person	40 sqm
Other comments	The original brief also included a green roof.	

Comparison of facility mix agreed by Cabinet in March 2015 and actual facility mix submitted in the Planning Application June 2020

Links to [Cabinet Report \(March 2015\)](#) and [Design Development document \(August 2015\)](#)

- 4.10 Another reason stated in favour of new build versus refurbish was the opportunity to provide an enhanced leisure provision. Comparing the existing provision at Gurnell and the proposed from the Planning Application, it is clear that the facility mix is not enhanced and will not meet the future needs of the borough:

- Increase to facility size focuses on pool area only
- Only 1 additional studio
- No increase to number of stations in gym
- Grass sports pitches removed in favour of landscaping
- Climbing wall and Sports hall that were originally in scope were descoped as the project progressed

AREA	CURRENT GURNELL LEISURE CENTRE	PROPOSED LEISURE CENTRE (June 2020 Planning Application)
Pool area	50m pool – 6 lanes (783sqm) Fun Pool – 16m x 12m (192 sqm) Sauna and steam	50m pool – 10 lanes (1250sqm) Fun Pool – 326 sqm Sauna and steam
Gym	100+ station	100+ station
Studios	2 studios	3 studios
Sports pitches	2 outdoor grass pitches	Grass pitches removed

- 4.11 The justification to demolish rather than refurbish the leisure centre is therefore entirely flawed. There is no evidence of any comprehensive assessment of the options i.e. obtaining estimates for the cost to refurbish, cost of like for like replacement, cost of enhancement replacement. Additionally, a significant part of the justification was the opportunity to provide a much-enhanced provision which will not be the case. Therefore, the decision to demolish rather than refurbish has no foundation.

Cost to build a new leisure centre

- 4.12 The estimated costs for the new leisure centre have evolved over the course of the project:
- £30M – March 2015
 - £33M – July 2015
 - £37.7M – May 2016 (increase due to “*challenging site issues*” such as being on the flood plain and £7M cost of underground parking)
 - £40-45M – February 2020 (verbally at the Cleveland Ward Forum)

- 4.13 Willmott Dixon were appointed through the SCAPE framework. They have delivered several leisure centres across the country, the table below outlines some of these, their cost, and the facility mix / specification. These costs are all from Willmott Dixon and can therefore be compared to the estimates outlined above (Willmott Dixon are part of Eco World and provided these cost estimates).

SITE	COST	LEISURE PROVISION
New Gurnell Leisure Centre	£37.7M (potentially £40-45M)	50m ten-lane pool, splash area, sauna and steam. Gym (100 station), 3 studios including one spin. Café, Soft Play and Party rooms.
Fairfield pools and Leisure Centre	£12M for a complex refurbishment	“Turning a tired 1970s era local asset into a super modern leisure facility” Originally constructed in 1976 with three pools and 95 station gym, 4 court sports hall, dance/exercise studios, group cycling studio, poolside sauna, teaching pool and more. Additional 30-50 years of use to public facility. https://www.willmottdixon.co.uk/projects/fairfield-pools-leisure-centre
Five Towns Leisure and Wellbeing Hub	£17M	Similar specification to Gurnell. 10-lane swimming pool, studio pool with moveable floor and a splash pad water confidence area. Gym, exercise studios, dedicated spin studio, climbing activity, café, meeting, and referral rooms for community use. Outside, four tennis courts, a wellbeing garden and interactive play area, a full size 3G artificial grass pitch and car parking. https://www.willmottdixon.co.uk/projects/five-towns-leisure-and-wellbeing-hub
Hart Leisure Centre	£24M	Higher specification than. Gurnell Three swimming pools in total including an 25m eight-lane swimming pool. Climbing wall and eight-court sports hall. 130 station Gym. Outdoor facilities include a full-size artificial pitch, two junior FA grass pitches and four five-a-side 3G pitches. https://www.willmottdixon.co.uk/projects/edenbrook-leisure-centre

Wycombe Sports Centre	£25M	Significantly higher specification than Gurnell. 8 lane 50 metre competition pool, community pool with adjustable floor depth and children's Splash Zone. Steam room and sauna. 150 Station state of the art gym, indoor cycling studio. 12 badminton court sports hall, 4 rink indoor bowls hall. https://www.willmottdixon.co.uk/projects/wycombe-sports-centre-high-wycombe
Winchester Sport and Leisure Park	£37M	Significantly higher specification than Gurnell for the same price. 50m eight-lane swimming pool, 20m teaching pool including a water confidence area, multi-use sports hall and climbing facility. It also encompasses four squash courts with a movable wall to enable flexible use, treatment rooms, a fitness suite (200 workout stations), two large studios, one spin studio and a café. Hydrotherapy suite to serve people in the local and wider community with disabilities. https://www.willmottdixon.co.uk/projects/winchester-sport-and-leisure-park-winchester

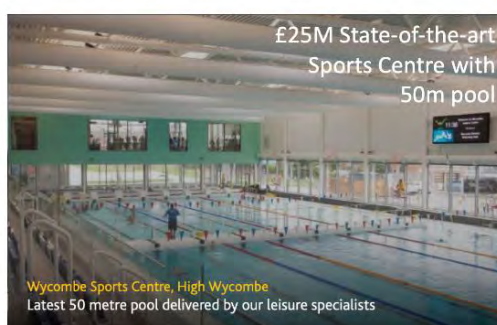
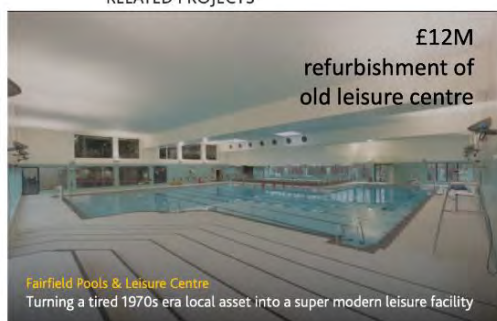


WHAT WE DO

OUR APPROACH

WHO WE ARE

RELATED PROJECTS



Comparison of facility mix, specification and cost of Leisure Centres built by Wilmott Dixon (part of Eco World)

- 4.14 Considering the facility mix being provided, the estimated cost of the new leisure centre is extremely poor value for money. Other local authorities have provided an enhanced provision for a lot less money, or a significantly enhanced provision for the same amount of money. Just the fact that the parking must be moved underground due to residential development being built on the current car park, adds at least £7M to the cost. The basement works are extraordinarily expensive since this site is on a flood plain and subject to both surface water and ground water flooding. Significant foundational work will be required due to the size and scale of the developments and the ground composition. Overall, these factors make the build extremely expensive. This drives up the cost of the leisure centre build and drives down the amount of money the developer will be paying Ealing in terms of the land receipt. This is a bad deal for the Council and its residents.
- 4.15 The Sport England Facility Cost Guidance suggests a cost of £18M for a leisure centre of a similar facility mix to Gurnell.

SITE	COST	LEISURE PROVISION
Sport England Facility Costs	£18M	Similar specification to Gurnell. 50m eight-lane pool plus learner pool, 5 court hall, 150 station health and fitness gym plus 3 studios. https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/facility-costs-q2-19.pdf?ayS0dLk0lucAJuUXG7knP8ppbeyxVEYh

Link to [Sport England - Facilities Costs Second Quarter 2019](#)

- 4.16 Given the proposed facility mix, £37.7 to £45M is an extortionate figure for a new leisure centre. Willmott Dixon have delivered similar specification leisure centres for significantly less cost and much higher specification centres for the same cost. The fact that the “facilitating development” is being built on the current car park adds at least £7M if not more. Equally the flood mitigation measures, and landscaping would not be required if just the leisure centre was being rebuilt. A comprehensive options assessment should be carried out to identify the cost of a like-for-like replacement and enhanced options without the underground parking and “MOL enhancements.” This is likely to achieve a more cost-effective build with either no funding gap, or a smaller funding gap which will be more easily resolved and won’t involve building 600 units on MOL.

Futureproofing of the new facility

- 4.17 The Planning Statement makes several comments about the objectives and vision for the new leisure centre:
- *“GLC has the opportunity to be a regionally significant facility, given it provides offers a 50m pool, for which there is a limited provision in London”*

- *“a new state-of-the-art facility”*
- *“The ‘vision’ is to deliver a new flagship water-based leisure centre, which includes a 50m pool of regional importance that will serve as a first-class leisure destination for existing residents and future generations”*

- 4.18 The new centre will be physically bigger than the current one and newly built, but there is nothing about it that should earn the title *“flagship”* or *“state of the art”*.
- 4.19 Given the funding issues, if Ealing is aspiring to build a *“pool of regional importance.”* and of Olympic size it should consult with neighbouring boroughs and seek financial contributions.
- 4.20 Aside from the increased pool provision, there are no marked improvements to the offering, either in terms of facility mix or size.
- 4.21 One of Ealing’s top three priorities is to make Ealing *“A healthy and great place”*
- “Working with residents to build strong, fair communities and to keep the borough a clean, safe and attractive place to live. That includes keeping people physically active, well and independent; helping those who need care to live better lives; encouraging sport and leisure; and striving to improve our air quality and reduce crime. It also means working with others to maintain the excellence of our parks and open spaces, and the streets we live in.”*
- 4.22 The proposal does not align with this priority. To encourage people to be more active you need to understand what the barriers are to them being active and therefore identify the real problem you are trying to solve. Simply building a new leisure centre, with a bigger pool and the same facility mix will not achieve this. This entire development has been designed with Ealing Swimming Club at the forefront - the needs of all other users have been neglected.
- 4.23 The council has missed a real opportunity here. Gurnell is envisioned to be *“heart of this Ealing Sports hub”*. Additional facilities could easily have been incorporated such as a hydrotherapy suite and treatment rooms to meets the needs of local athletes and the wider community. These would not have been expensive additions.
- 4.24 Aside from the lack of more diverse facilities, the new centre will not have sufficient capacity to meet the needs of the growing population. Just the fact that 599 residential units are being built on the site is likely to have a large increase in membership given this could house around 1,800 new residents based on the housing mix. Additionally, the population of Ealing as a whole is predicted to grow enormously over the coming years – by the time it is completed (target completion date 2024 - subject to additional delays) it will already be over capacity – the centre is meant to last for the next 40 years which it may do structurally but not capacity wise

- 4.25 The Ealing Sports Facility Strategy 2012 – 2021 states that:

“Ealing is the third largest London borough in terms of its population and is one of the most ethnically diverse communities in the country. In 2010, local analysis confirmed that official demographic statistics underestimated Ealing’s population and the figure agreed was estimated at 323,000. It was predicted that Ealing’s population would grow to 337,600 by 2021 and 347,000 by 2026.

However, the recently released 2011 census data confirmed that Ealing’s population is now 339,000, a level which exceeds the 2021 figure forecast in 2010. It must be noted that all the calculations in this strategy are based on the lower 2010 forecast figure which means that the increased population may produce a greater demand for facilities over and above those stated in the strategy. New homes are needed in Ealing to accommodate the borough’s projected increases in population”

Link to [Ealing Sport’s Facility Strategy 2012 – 2021](#)

- 4.26 According to the Office for National Statistics (ONS) the 2018 mid-year population estimate for Ealing was 342,000 therefore we have already surpassed the 2021 figures used for the sporting strategy.

Link to [2018 mid-year population estimates](#).

- 4.27 An additional concern is the lifespan on the new leisure centre itself. Two blocks of housing have now been attached to the centre and it is unclear what will happen to these in 40 years’ time when the new centre is “*end of life*.”
- 4.28 The May 2016 Cabinet minutes discuss the potential revenue stream from the new leisure centre, but fail to discuss either planned and preventative maintenance or a sinking fund coming from that figure – the key reason that the council are in their current predicament is because they did not have a sinking fund in place.
- 4.29 The council have completely overstretched themselves in terms of the project objectives, with the aspiration of building a leisure centre of “*regional significance*” despite this supposedly being a community asset for the residents of the borough. The citizens of Ealing are paying for this, both financially and by the detrimental impacts this development will have on them including the harm to MOL and non-MOL. Additionally, this development will not meet its strategic objectives, being broadly the same specification as the current centre and will be over capacity as soon as it’s finally finished.

Mismanagement of the project

- 4.30 Gurnell Leisure has been mismanaged by the council, with no sinking fund in place and inadequate maintenance, allowing the centre to fall into disrepair.
- 4.31 These proposals have been discussed at just five Cabinet meetings over the last five years:

- Link to: [March 2015 Cabinet Report](#)
- [July 2015 Cabinet Report](#)
- [November 2015 Cabinet Report](#)
- [May 2016 Cabinet Report](#)
- [September 2019 Cabinet Report](#)

4.32 A Business Case was not produced. This was requested from Ealing Council; however, the response only included the “Feasibility Study” that 3DReid produced or referred to the various Cabinet Reports. Neither of these documents constitute a Business Case.

4.33 A Business Case is the key foundational document that every major public project should have. This should have contained the following:

- The problem statement – what problem needs to be solved? The original problem that this project is seeking to address was the fact that the leisure centre needed refurbishment/replacement. This project was never meant to be about addressing housing needs.
- Objectives – the desired results of the project. Rather than having an objective of building a “*flagship leisure centre*” the true objective should have been making the borough’s residents more active in line with the council’s priorities.
- The key measurable benefits should also have been outlined, such as an increased participation in sports activities, decrease in health conditions due to lack of exercise and improvements in physical and mental well-being.
- Constraints - these should have been better considered such as limited funding, inappropriate development on MOL.
- Costing of options - a Business Case should outline all the options with their costs and projected revenues. Rather than consider these options, the decision was made to build a new, bigger leisure centre without weighing up these options and despite the severe funding constraints.
- Stakeholder mapping was not carried out. The only stakeholders identified were the Ealing Swimming Club and the new centre focuses on their needs alone.

4.34 There has been a significant lack of meaningful consultation with the key stakeholders. Despite several “consultation events” taking place the residents of the borough have never truly been consulted. The Cabinet decided the facility mix in isolation in March 2015, an entire year before the public even knew about the plans. Additionally, items were descope along the way without any public knowledge. The events were poorly publicised and key information such as building heights and budget were not made transparent. At no stage were the residents asked what they wanted in their new leisure centre or what would make them more active.

- 4.35 Budget management has been severely lacking. The original estimates for pre-application activities were £75K and subsequently jumped to £1.34M. The estimated cost of the new leisure centre was £30M and increased to £37.7M. Anecdotally, the leisure centre build costs have been estimated by the council to be £40-45M.
- 4.36 Risk Management of the project has been extremely poor. At the outset of the project the developer carried all the risk – they were responsible for the build of the entire development and this was going to be cost neutral to the council. In this scenario, the developer carried all the delivery responsibility and associated risk.
- 4.37 In February 2019 Ealing had a second round of pre-application discussion with the GLA. At this point the proposal did not include any affordable housing. The GLA suggested that this should be included.
- 4.38 This caused a knock-on effect and in September 2019 there was a significant change to the deal structure between Ealing Council and Eco World.
- 4.39 Consequently, in the September 2019 Cabinet a change in deal structure was discussed and agreed. EcoWorld had determined that the project would no longer be viable to them if they had to build affordable housing. The deal structure then changed so that EcoWorld would be responsible for the basement works (since they span the entire site) and blocks C-F and the council will have direct delivery responsibility for blocks A and B and the leisure centre. This was outlined and agreed by the Cabinet in the September 2019 Cabinet meeting:

“in agreeing in principle to the Council taking on direct delivery responsibility for part of the scheme there is an associated risk of an additional capital requirement over and above that currently budgeted for. This could be up to a multi-million pound amount for which no budget provision currently exists”

“Since the last Gurnell update report to Cabinet in March 2016, the scheme has continued to present viability challenges and The Council and the Developer have been in discussion for some time in order to identify the means by which the viability of the scheme could be improved. As previously reported to Cabinet in October 2018, the GLA have approved the funding for the scheme as part of the ‘Building Council Homes for Londoners’ funding programme. The proposed incorporation of affordable housing into the Gurnell scheme provides an opportunity to improve the viability of the scheme through utilisation of this grant funding and additionally supports the Council in meeting its affordable housing delivery target. 3.6.

However, there has remained a viability challenge to deliver the scheme. As a result, an alternative delivery approach has been developed whereby the Council would directly deliver part of the scheme (the Leisure Centre and circa 200 units in Blocks A+B which are intended to be affordable), with the Developer delivering the remainder of the scheme (circa 400 residential units for open market sale as well as the basement serving both parts of the scheme). This would be a change from the baseline approach which had previously been developed where the Developer would build out the full scheme.”



Deal structure and delivery responsibilities

- 4.40 This was a substantial change to the baseline approach and carries a significant deal of risk for the Council.
- 4.41 It should also be noted that the original financial structure would have meant that the residential development would have been classed as an “*enabling development*” however, given this, only part-funding this is now a “*facilitating development*”. This is a key change and is connected to the arguments against building on MOL discussed later in this document.

Conclusion

- 4.42 Ealing Council failed to effectively manage this project. With the current facility mix and size, the new leisure centre will not be future proofed and will fail to meet strategic objectives. The estimated cost is excessive for the proposals and this ironically being driven by the facilitating residential development. The council now had direct delivery responsibility for the leisure centre, and they have already managed the project poorly to date, with no control of scope, risk, budget, and time. Now is the time to take a step back and reassess options before selling off public land and making a decision which they will not be able to turn back from.

5. USE OF “ENABLING DEVELOPMENT” PRINCIPLES

- 5.1 The original funding principle for these proposals was that the new leisure centre would be funded by an “enabling development”. According to Historic England (Enabling Development and Heritage Assets - Historic Environment Good Practice Advice in Planning Note 4), *“Enabling development is development that would not be in compliance with local and/or national planning policies, and not normally be given planning permission, except for the fact that it would secure the future conservation of a heritage asset.”*
- 5.2 Paragraph 202 of the NPPF (2019) is also relevant *“Local planning authorities should assess whether the benefits of a proposal for enabling development, which would otherwise conflict with planning policies but which would secure the future conservation of a heritage asset, outweigh the disbenefits of departing from those policies.”*
- 5.3 The Historic England Practice Notes paragraphs 15 and 16 state that:
“The defining characteristic of enabling development is that it would secure the future conservation of a heritage asset if other reasonable efforts have failed, and the balance articulated in NPPF paragraph 202 is met, i.e. the future conservation of the asset is secured and the disbenefits of departing from conflicting planning policies are outweighed by the benefits.”

“In practice this means a decision-maker being satisfied that a scheme of enabling development would securely provide for the future of the heritage asset.”
- 5.4 Enabling development should only be considered after all reasonable alternative means have been assessed it should be the last resort. All reasonable alternative means have not been assessed. There is no evidence that a full funding assessment has been carried out or documented (FOI request ref 19/1644).
- 5.5 As outlined in the earlier sections of this document, no Business Case was produced for this project and alternative funding means have not been sufficiently investigated. Right at the outset of the project, the decision was taken that an “enabling development” would be the solution to the funding problem.
- 5.6 The harm caused by enabling development is likely to be permanent and irreversible. As a direct result of this proposal, substantial MOL and other harm will be caused.
- 5.7 Given the fact that this is now only a facilitating development (i.e. the residential component is not fully funding the leisure centre) and the council have direct delivery responsibility, there is no way that the decision maker i.e. Ealing as the Local Planning Authority can be *“satisfied that a scheme of enabling development would securely provide for the future of the heritage asset.”* There is absolutely no guarantee that the funding from the residential development will secure the future of the leisure centre.

Conclusion

Despite using the principles of “enabling development” as a reason to depart from planning policies, the proposal is facilitating rather than enabling. There is no guarantee that the funding coming from the residential development will secure the new leisure centre and therefore a departure from planning policy on this basis should be denied.

6. FINANCIAL VIABILITY

- 6.1 The financial viability assessment produced by James Brown clearly says, “ the scheme falls short of being viable as it does not produce a sufficient profit percentage. It drives a profit of 11.69% on cost whereas a reasonable return is 17% on cost in this instance.”
- 6.2 Apart from the unviability of the scheme, there is also extremely high risk associated with that 11.69% profit. The appraisal is very sensitive as viability is determined by subtracting one very large figure (total costs) from another very large figure (total value) to give the residual profit. It is, therefore, very important to ensure that the estimated value and estimated cost are very thoroughly assessed.
- 6.3 The following risks can be highlighted:
- For the open market housing, very little comparable evidence is provided of similar nearby new developments (as there are none) and no advice about values has been provided by local estate agents. For a scheme of this size it would be normal practice to have had reports from two estate agents providing full schedules of estimated values based on their market knowledge, but this back up evidence is missing. The estimated values by James Brown appear reasonable but could easily be 5% too low or too high, so the conclusion must be that the expected open market sales values are somewhat uncertain, which means that the residual developer’s profit is also uncertain.
 - Whilst the open market residential costs are backed up with a 35-page report by Gardner Theobald, the affordable housing and leisure centre costs are summarised into a one-page report by Willmott Dixon, without any disaggregation into the component parts of the two affordable housing tower blocks, the leisure centre and the very large basement car park and plant rooms. Therefore, these values may be underestimated, further reducing developer profit, and increasing estimated cost to the council
 - Several costs have been removed from the viability assessment which would make it even less viable. Project management fees, preconstruction service fees, design management fees, survey fees, regional adjustment, inflation, and risk budget have not been included in the assessment.

Conclusion

- 6.4 As the FVA already states, this scheme is not viable to the applicant. There are significant site-specific costs which are reducing developer profit and significant areas of risk that may further erode this. Should these risks materialize the applicant may look to change the scheme via an “amendment” which could further increase the size the of market sale build. Equally the costs of the leisure centre and affordable housing elements are uncertain. Given the Council has now taken on deliver and the associated risk, this is very concerning.

7. THE CASE AGAINST DEVELOPMENT ON MOL

7.1 Four key factors have been considered when assessing the case for development on MOL:

- Whether the development is deemed inappropriate.
- Whether the proposal is truly the minimum quantum required to meet the facilitating objectives.
- Whether this site is truly the “*site of last resort*” i.e. could either the LC or facilitating residential be built elsewhere.
- MOL / non-MOL harms and benefits the scheme will bring and demonstration that Very Special Circumstances (VSC) exists.

Inappropriate development

7.2 The Site is located within Metropolitan Open Land (MOL) and current London Plan Policy 7.17 and draft London Plan Policy G3 are relevant, stating that “*The strongest protection should be given to London’s Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt.*”. Therefore paragraphs 143-147 of the NPPF (2019) “Proposals affecting the Green Belt” are relevant.

7.3 Paragraph 143 of the NPPF states that “*Inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances* The proposed development comprises of four components, Leisure Centre, Housing, Retail and Open Space enhancements. All four, bar the open space enhancements are inappropriate, and this is confirmed in the Planning Statement.

7.4 In accordance with paragraph 144 of the NPPF “*When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations*”

7.5 Therefore, it must be demonstrated that any harm resulting from the proposal is clearly outweighed by its benefits. This will be assessed in detail the following section – **SUMMARY OF STATED HARMS AND BENEFITS**

Minimum quantum of development

7.6 A Financial Viability Assessment (FVA) was produced to evidence that the facilitating residential development is truly the minimum quantum required to bridge the funding gap estimated to be between £25.2m and £32.5m. The exact gap is unclear; however, the Council contribution is confirmed as £12.5m.

- 7.7 It appears that the conclusion in the FVA is that affordable housing cannot viably be included in the overall scheme. What is unclear is why the developer wants to take on this project given the margins are so small for them. The FVA is discussed in more detail later in this document.

Site of last resort

- 7.8 To determine whether the proposed site is truly the “*site of last resort*” an Alternative Sites Assessment (ASA) was carried out.
- 7.9 The methodology assumes that the site must be greater than 0.25ha to accommodate at least 50 units at a minimum density of 200uph (units per hectare) – the proposed development at Gurnell is 422uph.
- 7.10 The filtering process eliminates sites that are too small, have already been identified for disposal (27 of these) in the councils Medium Term Financial Strategy (MFTS), or are not available (long lease etc) or not appropriate (cemeteries etc).
- 7.11 The result of the assessment leaves only 15 sites which are 3 care homes and the remainder are green spaces of various designations. The detailed assessment rules out these sites as it deems them less suitable than the current GLC site.
- 7.12 The methodology is flawed as it is based on identifying sites to build 600 units – however only 403 units form part of the facilitating provision. Given the reduced number of units required, sites smaller than 0.25ha should have been considered – this would also help meet the objectives of Policy H2 of the draft London Plan “Small sites and small housing developments” which promotes building on sites of 0.25ha or less.
- 7.13 A significant number of sites, c27 have already been identified for disposal under the Council’s MFTS (Medium Term Financial Strategy). This strategy should be scrutinised thoroughly to understand where these sites and funds have been pre-allocated and whether protection of MOL would be more beneficial.
- 7.14 Given this development is meant to be “regional” in size, London Borough of Ealing should have discussed with neighbouring boroughs to identify whether additional funding could have been secured (Hillingdon and Harrow). Brent council’s proposed redevelopment of Bridge Park Community Leisure Centre which is 3 miles away from Gurnell.
- 7.15 The Council’s MFTS should be thoroughly scrutinised to ensure that the funding shortfall for the leisure centre cannot be found elsewhere. Given the number of developments in Ealing there should be sufficient s106 funding which could pay for a new/refurbished leisure centre.
- 7.16 Additionally, the ASA should be carried out again taking all sites into consideration and with the target of identifying sites for 403 units rather than 599. The quantum of development could even be reduced if a more reasonable cost estimate for the leisure centre is reached.

Harm to MOL

- 7.17 The Planning Statement assesses potential harms to MOL including impact to MOL openness, and impact on MOL usability.
- 7.18 It also assesses other harms including transport impact, parking displacement, noise, air quality, sunlight and daylight, ecological impacts, trees, light pollution, wind and microclimate and heritage.
- 7.19 The Planning Statement section 7.57, table 7 outlines the potential harms to MOL the Applicant foresees. Each of these areas has been addressed in turn, identifying the actual harm caused despite the mitigations proposed. In some cases, the survey's and assessments used in the application contain shortcomings which have resulted in flawed conclusions being made.

MOL harm - Impact to Openness

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

Impact to Openness MOL is clearly distinguishable from the built-up area. Development which impacts upon the openness of or causes visual harm to the MOL will be attributed significant weight
MITIGATION AND RESIDUAL HARM FROM THE PLANNING STATEMENT
Building Footprint This has evolved through comprehensive discussions with LBE and the GLA to ensure the MOL retains a maximum degree of openness. It has been sensitively devised to ensure it comprises the optimal footprint, focussing entirely on the available 14,215sqm of PDL located to the south of the site with no additional MOL land-take. Accordingly, and as Drawing Ref: 180237-3DR-MP-00-DR-00103 illustrates, a “PDL to MOL” land swap has been agreed in principle with a degree of original MOL now proposed to be developed on with a respective equivalent degree of original PDL to be returned back to MOL. This will ensure no net MOL loss. The “PDL to MOL” land swap allows the new leisure to alter in its orientation so it is further set back away from the parkland. Whilst now parallel to Ruislip Road East and thusly providing a much improved frontage and presence to the south, this also ensures a greater degree of open space to the north in the parkland. The “PDL to MOL” land swap has also allowed for the residential blocks to take on a much more fluid, open form, not bound so tightly to the highly constrained western edges of the existing car parking area.
Scale and Massing This has evolved through comprehensive discussions with the GLA and LBE with a view to mitigating impacts on MOL openness. Accordingly, the massing has been split into 5 residential blocks between which, there are glimpses and vistas into and out of the MOL. This maximises transparency across the

ensuring that, as above, the requisite leisure centre and facilitating residential scale can be accommodated.

Materiality and Design

The current leisure centre is squat within the landscape and relates poorly to its context. The new leisure centre with facilitating residential units, whilst substantially larger in scale than the built form as existing, represents a substantially higher quality of design that has evolved through meetings with both the GLA and LBE. It has considered cost, appearance, levels of access and quality of life to ensure that it lends the site and much increased sense of place. The design rationale is provided in more detail in the submitted Design and Access Statement.

Landscaping

Whilst the proposed landscaping strategy is provided in more detail in the Design and Access Statement and in the section below, it should be reiterated here that as part of the proposal, a comprehensive package of landscape enhancements are proposed across the Site. These enhancements involve the creation of comprehensive new walking and cycling routes, increased areas of ecological value, formal and informal areas of play, flood mitigation works, and a bridge across the River Brent. This will substantially enhance the usability, access, quality and range of uses for the MOL in accordance with draft London Plan Policy G3. The result is a much wider range of benefits for Londoners than that which currently exist

Residual Harm Level

A Townscape and Visual Impact Assessment has been submitted to support this application which assesses any landscape and visual effects and impacts on openness that may result from this proposal.

The Visual Impact Assessment recognises that the buildings have been arranged to minimise direct impact on MOL. Following the construction period of the development (for which it is expected that planning conditions will be imposed to mitigate adverse impacts on the usability of the MOL), the Visual Impact Assessment concludes that the operation and existence of the new buildings would *“bring about permanent change to the Site and to people’s views of it”*. Whilst the scheme has been designed to *“mitigate incremental loss of views”* through the *“creation of green links through the development”*, *“direct landscape effects [in the southern part of the Site] would remain significant (initially Major Adverse).”*

It should be reiterated here that the respective MOL in which the proposed development is to be located is substantial and vast, comprising of wide-open environs. This is a point noted by the submitted Visual Impact Assessment, which notes that the Major Adverse landscape impacts caused by the proposal would diminish with distance into the wider MOL – particularly given the wider landscape enhancements proposed.

In the southern area of the Site *“the increased building massing would realise a locally significant adverse effect on the purposes and function of the MOL designation.”* However, again, beyond the immediate boundaries of the new built massing the Site *“would continue to provide the openness function and satisfy the MOL criteria.”*

From the surrounding context looking into the Site there would be a loss of open green views. However, these views already contain buildings *“both on, and adjacent to the Site.”* Whereas the replacement views would be of a high-quality development. In this respect and particularly as the landscaping around the scheme starts to mature, the townscape effects of the proposal along Ruislip Road East closest to the proposal would materialise as Moderate to Minor Adverse.

7.20 National Planning Practice Guidance (NPPG) published on 22nd July 2019 is relevant here (Ref ID 64-00 1-20190722 to 64-003-20190722).

7.21 Paragraph 001 “What factors can be taken into account when considering the potential impact of development on the openness of the Green Belt?” states that:

“Assessing the impact of a proposal on the openness of the Green Belt, where it is relevant to do so, requires a judgment based on the circumstances of the case. By way of example, the courts have identified a number of matters which may need to be taken into account in making this assessment. These include, but are not limited to:

- openness is capable of having both spatial and visual aspects – in other words, the visual impact of the proposal may be relevant, as could its volume;*
- the duration of the development, and its remediability – taking into account any provisions to return land to its original state or to an equivalent (or improved) state of openness; and*
- the degree of activity likely to be generated, such as traffic generation”*

7.22 Spatially, the proposed buildings are enormous and will have a significant impact on the openness of the MOL. The duration of the development itself will be 5 years, however these are permanent structures and the land will not be returned to its original state – once this land is built on, the MOL will be irretrievably lost. Additionally, the degree of likely activity to be generated is substantial. Transport impacts will not only result from the construction in the short term, but also from the additional 1,800 residents and Leisure Centre visitors as the new centre seeks to increase membership.

7.23 Paragraph 002 “How might plans set out ways in which the impact of removing land from the Green Belt can be offset by compensatory improvements?” states that:

“Where it has been demonstrated that it is necessary to release Green Belt land for development, strategic policy-making authorities should set out policies for compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land. These may be informed by supporting evidence of landscape, biodiversity or recreational needs and opportunities including those set out in local strategies, and could for instance include:

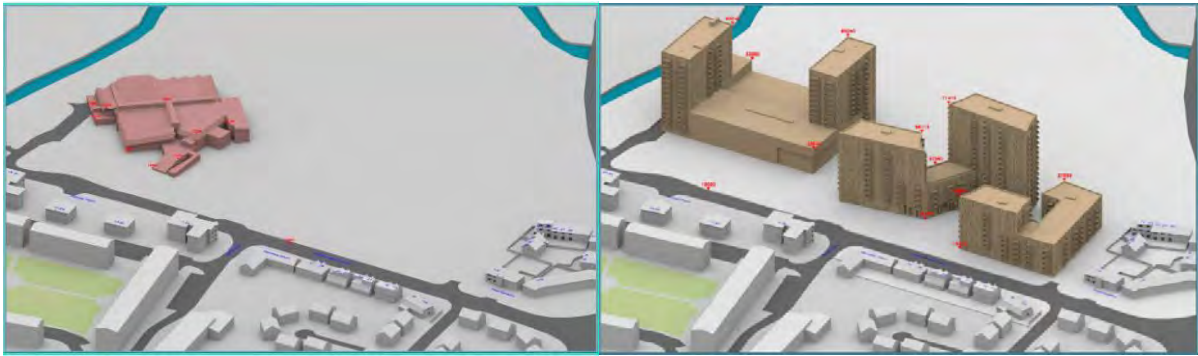
- new or enhanced green infrastructure;*
- woodland planting;*
- landscape and visual enhancements (beyond those needed to mitigate the immediate impacts of the proposal);*
- improvements to biodiversity, habitat connectivity and natural capital;*
- new or enhanced walking and cycle routes; and*
- improved access to new, enhanced or existing recreational and playing field provision.”*

7.24 The Green Infrastructure will be damaged by the proposed development, allowing urban sprawl and the residential areas to merge, and effectively bottlenecking the green corridor. Any planting and “improvements to biodiversity” will be far outweighed by removal of trees, other habitat, and a significant area of SINC. Additionally, two sports pitches will be removed to allow for park landscaping.

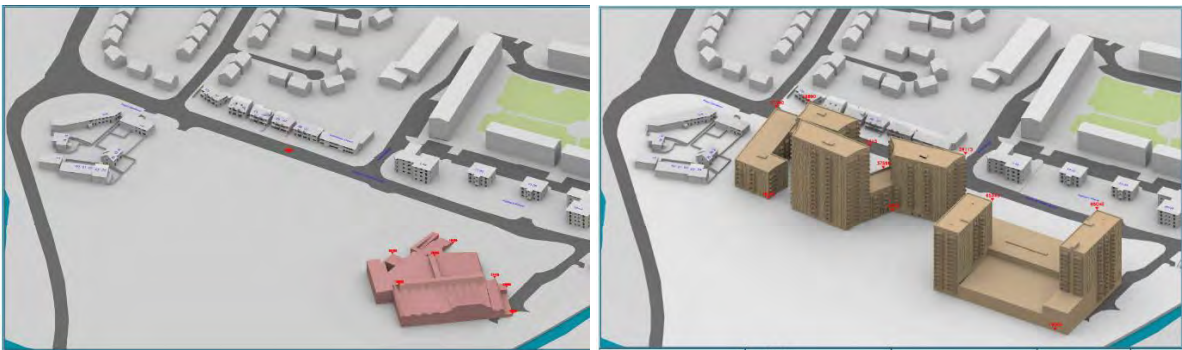
- 7.25 Images taken from the Daylight and Sunlight Assessment clearly show the material increase to footprint and volume of the proposed buildings



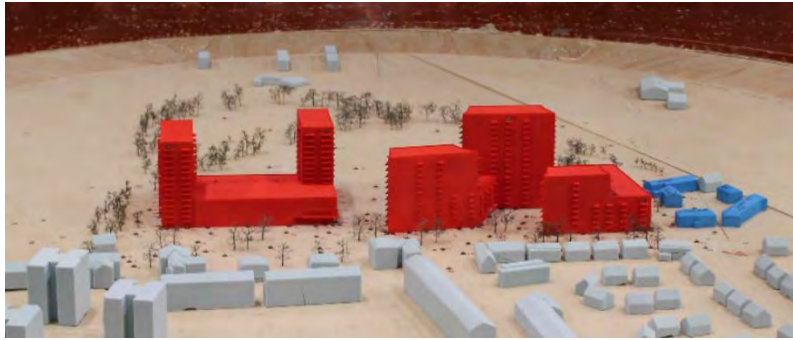
Footprint – Existing and proposed



Front elevation from Ruislip Road East – Existing and proposed



Rear elevation from Ruislip Road East – Existing and proposed



Scale model of the proposed development from the wind assessment

- 7.26 The mitigations and residual harm outlined in the Planning Statement will be assessed in the following paragraphs.

Building footprint

- 7.27 There is a net loss of 77sqm of MOL as per the “PDL to MOL” land swap.
- 7.28 The concept of openness has both a spatial and visual aspect. This proposal will result in the erosion of the openness of MOL and will represent a significant built form where currently there is none – the entire site including the car park is designated MOL. This is harm that weighs substantially against the proposal.
- 7.29 The new leisure centre is also materially larger due to the additional floors and the two 15 storey tower blocks attached to it.
- 7.30 Although the car park is currently developed to the extent it contains hardstanding, it is not intensively developed by any means. It also contains a significant number of trees and hedgerow which add to the visual amenity and ecological value.

Scale and Massing

The development consists of the following - this is a development of significant size and scale.

Block	No. of Storeys	Height	Units	Building use
A	15	47m	98	GLC and residential (affordable)
B	15	47m	98	GLC and residential (affordable)
C	13	41m	104	Commercial and residential (private)
D	17	53m	158	Residential (private)
E	10	31m	87	Residential (private)
F	6	19m	54	Commercial and residential (private)



Image of the proposed development

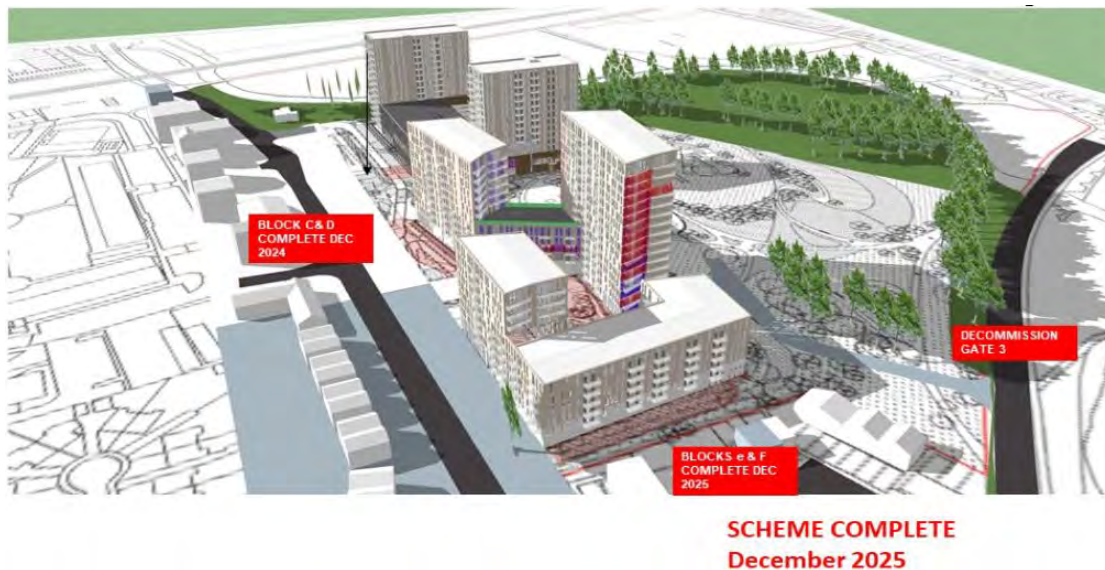


Image of the proposed development from the Construction Management Plan

7.31 Scale and massing relate to visual impact and there is significant impact to visual openness. The proposed development will effectively close off views from the southern edge of the site and therefore detract from the sense of openness.

7.32 The Planning Statement states that:

“there are glimpses and vistas into and out of the MOL. This maximises transparency across the site whilst ensuring that, as above, the requisite leisure centre and facilitating residential scale can be accommodated”

A “glimpse” is defined as a momentary or partial view, there will be minimal transparency in and out on the MOL from a north/south viewpoint. The development will effectively form an enormous 6-17 storey brick wall in the southern part of the MOL and the openness will not be preserved.



Front elevation of the proposals

London Plan Policy 7.7, draft London Plan policies D2 and D8 and policy 7.7 of LBE's Development Management DPD are relevant.

Materiality and Design

- 7.33 The current leisure centre blends into the park due to its minimal height and as it is surrounded by trees.
- 7.34 Visual impact is not limited to what something looks like in isolation, but also how it relates to its environment. The new leisure centre will be materially larger, and the design of the proposed development is unattractive and not visually appealing.
- 7.35 The Design and Access Statement states that *"The material palette as a whole is conceived as having 'park-land colours', with a spread of tones that will harmonise with the setting year-round"*. It is impossible to disguise this development, it will not harmonise with the setting at any time of year.



Overview of the development and "materials palette"

- 7.36 The public outcry over the poor design and loss of MOL can be seen in the hundreds of public objections on Ealing Council's planning portal many of which attest to the fact that these buildings are unattractive.

- 7.37 Aside from the harm to MOL, the proposals to do not comply with London and Local policies on tall buildings. Please see APPENDIX 5. TALL BUILDING'S POLICIES for further details details APPENDIX

Landscaping

- 7.38 While the proposal seeks to add landscape enhancements, it provides them to the detriment of lost playing fields and natural habitat.
- 7.39 These enhancements do not factor in the loss of the protected meadows due to the proposed BMX track. Long Field meadow is designated by the GLA as a Grade 1 Site of Borough Importance for Nature Conservation for its flora and fauna.
- 7.40 The Brent River Park also has a flood management function with Osterley Weir a key structure (managed by the Environment Agency) and flood storage remaining possible in open spaces along its length.
- 7.41 The proposals include the creation of designated walking and cycling routes. Ealing has plenty of structured parks, however open spaces such as these have been invaluable during the recent pandemic, allowing people to walk freely and adhere to social distancing guidelines. Funnelling people into certain routes makes this much more difficult.
- 7.42 The bridge across the River Brent will damage part on the SINC and increase pedestrian and cycle traffic into the meadow, this will have a negative impact on the section of the meadow outside of the BMX proposals

Visual Impact Assessment

- 7.43 A Townscape and Visual Impact Assessment has been submitted to support this application. This is meant to assess any landscape and visual effects and impacts on openness that may result from this proposal.
- 7.44 The map below shows the viewpoints that were selected for this assessment. There are several key views missing (highlighted with stars below), notably there are no views from the south of the site facing north of from within the parkland and meadows themselves facing south. Views from local heritage assets have not been included (Hanwell Community Centre, Cuckoo Avenue Conservation Area and St Mary the Virgin – the former two are not in the map). Therefore, the views that have been selected are entirely insufficient to identify the visual impact of the development.
- 7.45 The viewpoints from the south of the proposed development are particularly important. The community in Gurnell Grove are already somewhat marginalised from a socio-economic standpoint. The north facing units in the new development have been deemed acceptable as they have parkland views, however the applicant feels it is acceptable to not only remove those parkland views from the homes on Ruislip Road East and in Gurnell Grove, but also to completely overshadow them.

As industry standard practice, the Visual Impact Assessment viewpoints locations have been agreed with the Local Planning Authority.

The viewpoints are as follows:

- VP1 Ruislip Road East/Bus Stop
- VP2 Ruislip Road East/Avalon Road
- VP3 Argyle Road (Peal Gardens)
- VP4 Ealing Golf Club/footpath over River Brent
- VP5 Argyle Road (River Brent)
- VP6 Stockdove Way (No.22)
- VP7 South Greenford Station (platform)
- VP8 Horsenden Hill (Capital Ring footpath)



Viewpoint location HORSENDEN HILL (base copyright Google Maps)



Viewpoint locations MAIN STUDY AREA (base copyright Google Maps)

Map of viewpoints used in the VIA (number VP1, VP2 etc)
and proposed viewpoints indicated with stars.

- 7.46 Wireframes have been used to demonstrate the likely impact of the development. These are extremely basic and do not provide a true indication of the size and scale of the development and its visual impact. Many of the wireframes do not even include the tops of buildings, making it impossible to get a true feeling of the impact.
- 7.47 The wireframe below is taken from viewpoint 3 Argyle Road, next to Peal Gardens, facing west. Even with the tops of the buildings cropped out, the impact of the buildings is clear and the impact on the east-west permeability of the open space.

Figure 11: Viewpoint 3 Argyle Road/Peal Gardens: Development Case Photomontage



- 7.48 This wireframe below is taken from viewpoint 5, Argyle Road. Even from this distance the scale of the development impact to openness is evident. The picture does not even include the entire development.

Figure 15: Viewpoint 5 Argyle Road adjacent to River Brent: Baseline Photograph



- 7.49 The wireframe below is taken from viewpoint 4 Ealing Golf Club/footpath over the River Brent. This is just a few metres from the Grade I and Grade II listed St Mary the Virgin church and therefore the view from this heritage asset is likely to be impacted significantly as even from that distance the towers impose on the skyline.

Figure 13: Viewpoint 4 Ealing Golf Club/footpath over River Brent: Development Case Photomontage
Scaled view
When viewed at arms length (approximately 50cm) this A3 sized scaled image provides a realistic representation of the view



- 7.50 Additional images can viewed in the appendices:

APPENDIX 1. DEVELOPER IMAGES OF THE GURNELL PROPOSAL

APPENDIX 2. COMPARISON PICTURES

APPENDIX 3. VISUAL IMPACT ASSESSMENT IMAGES

APPENDIX 4. CGI IMAGES OF THE DEVELOPMENT PRODUCED BY SAVE GURNELL

Conclusion

- 7.51 This development will cause substantial harm to openness, both visually, spatially and through the erosion of MOL. The VIA even states that *“the increased building massing would realise a locally significant adverse effect on the purposes and function of the MOL designation”* and the Planning Statement concurs *“there would be a loss of open green views”*. Any compensatory measures by means of ecological improvements or landscaping will not be sufficient to outweigh the harm to openness and other harm caused by these proposals.

Impact to MOL usability

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

Impact on MOL usability MOL improves Londoners’ quality of life by providing localities for, amongst other uses, sporting, leisure, and health benefits through encouraging walking, running and other physical activity
MITIGATION AND RESIDUAL HARM
PDL focus The available PDL on the Site is located towards its southern boundary adjacent to Ruislip Road East, and currently comprises the existing leisure centre and leisure centre car park. As set out above, the development would be focussed on this PDL, where the existing leisure would be replaced with a new facility, the existing carpark relocated underground, and the new residential element located over where the current carpark is. This ensures that this element of the proposal would not result in any adverse changes in the use or function of the wider MOL as an area available for open recreation.
Flood Mitigation Away from the built element of the proposal and into the wider MOL, the current form comprises generally flat open parkland that slopes down gradually towards the River Brent. Beyond the River, again, the site comprises generally flat open grassland with no notable features or landforms. There are marked out sports pitches across the site that are useable during times of non-inclement weather. Though as set out in the accompanying Flood Risk Assessment and confirmed by the Environment Agency Flood Risk Map and the West London Strategic Flood Risk Assessment, as current, much of the Site is at a medium to high risk of surface water flooding. Accordingly, as part of the proposal a comprehensive series of flood mitigation works packaged with landscaping enhancements are proposed that would restrict the peak discharge rates from the site to three times the greenfield rates. Even with the built massing of the new development, the volume of water to be discharged from the site over the first 6 hours of a rainfall event is expected to be reduced. The result of this would be a much more useable open space.
Landscape Enhancements As set out above and in the submitted Design and Access Statement, a comprehensive suite of landscape works are proposed that would substantially enhance the Site’s use. This includes the removal of the featureless grassland in favour of defined paths, walking and cycling routes(which includes the provision of a new footbridge over the River Brent to assist towards the Council’s aspiration for a ‘Greenford to Gurnell Greenway’ pedestrian link), areas of formal and informal play and areas of enhanced ecological value – such as meadow enhancements and wetland creation (as detailed

in the submitted Ecological Survey). This will open up the MOL, which currently has few accessible paths, to a much more diverse range of activities and allow more users, regardless of their mobility, to access the enhanced space and enjoy it.

Alongside the marked out pitches, the MOL parkland also contains a permanent children's playground, BMX track and a skatepark. Whilst the proposal would necessitate their temporary removal, they would be comprehensively re-provided as part of the park's wider enhancements.

Residual Harm Level

The only minor adverse use impact arising as a result of the development would be the loss of the ground level leisure centre car park in favour of residential - particularly as it is understood that this car park is also used by visitors to the open MOL land to the north. However, replacement leisure centre car parking is being re-provided underground. Further, for those visitors to the MOL open space who do not wish to park underground, the Transport Assessment submitted with this application illustrates that there are numerous streets within close proximity to the site that have capacity for additional short-term parking – particularly as there are no Controlled Parking Zones nearby. Harm in this respect is therefore considered to be negligible.

In terms of the wider MOL usage, whilst the area for football pitches will be lost, they will be replaced with substantially more usable and accessible parkland - enhanced both in terms of leisure function, usability, access and ecological value. Accordingly, it is not considered that the wider development would result in any harmful impacts on the MOL's usability and wider leisure function.

PDL focus

- 7.52 Although the development has been constrained to PDL there is still an impact on the usability of the MOL.
- 7.53 The overshadowing caused by the development will be significant. Currently, due to the low-lying nature and positioning of the leisure centre there is no significant overshadowing of the park or outdoor facilities (BMX track, skate park or playground).
- 7.54 The proposed buildings will cause significant overshadowing all year round the playground will be impacted due to its proximity to the towers. At certain times of the year shadows will stretch across the entire park, all the way to Stockdove Way and the proposed relocation site of the BMX track.



Overshadowing of park, playground and skate park

Flood mitigation

- 7.55 A significant part of the site is functional flood plain which is nature's way of dispersing energy from the river. If it were not for the proposed development, no flood mitigations activities would be taking place here.
- 7.56 Floodplain ecosystems can be biodiversity hotspots and should therefore be left in their natural state. Therefore, there may be unforeseen ecological consequences from implementing such measures.

Landscape enhancements

- 7.57 The Planning Statement suggests that the landscaping will enhance the ecological value of the park. This element is questionable and particularly when considering the destruction of the SINC for the BMX track.
- 7.58 Usability will be reduced by the removal of two grass sports pitches.
- 7.59 As stated in earlier points, the proposals include the creation of designated walking and cycling routes. Ealing has plenty of structured parks however open spaces such as these have been invaluable during the recent pandemic, allowing people to walk freely and adhere to social distancing guidelines. Funnelling people into certain routes makes this much more difficult.

Conclusion

- 7.60 These proposals would result in the loss of MOL usability in terms of its open and unstructured nature and significant adverse impact to openness and overshadowing. The loss of the surface level car park will create additional strain on parking in local streets (see Parking Displacements section for further details). The park will also become less usable due to the sheer number of additional users, the new development will bring around 1,800 new residents into this site and essentially what is being built here is an amenity space for those residents to the detriment of the existing community.

Harm to non-MOL

- 7.61 The Planning Statement assesses potential harms to non-MOL including transport impact, parking displacement, noise, air quality, sunlight and daylight, ecological impacts, trees, light pollution, wind and microclimate and heritage.
- 7.62 The Planning Statement section 7.57, table 8 outlines the potential harms to MOL the Applicant foresees. Each of these areas has been addressed in turn, identifying the actual harm caused despite the mitigations proposed. In some cases, the survey's and assessments used in the application contain shortcomings which have resulted in flawed conclusions being made.

Potential other harms – Transport Impacts

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

MITIGATIONS AND RESIDUAL HARM FROM THE PLANNING STATEMENT
Mitigations Proposed • Retention of existing vehicular access points • Additional pedestrian routes through the site • Policy compliant car and cycle parking which responds to the Site's well-connected location • Submission of a Residential Travel Plan and Delivery Servicing Plan to stipulate best practice and procedure for traffic generated during construction and operation. Residual Harm Level • Transport Assessment, Residential Travel Plan and Delivery and Servicing Plan confirm that the proposal is acceptable in transport terms as it complies with relevant planning policy and regulations. Accordingly, no residual harm anticipated.

7.63 The Transport Assessment is flawed in many areas and therefore negates the arguments of no harm caused:

- The traffic survey by Systra was carried out over 3 years ago and is therefore outdated and incorrect.
- A traffic lane has been removed from Ruislip Road East in 2018 and there has not been a survey since then to quantify the impact on local traffic (residents say there has been an increase in congestion and pollution.) Also, since the instalment of the Quietway, traffic accidents have increased in the area.
- Accident data in the traffic survey covers 2011-2016. It clearly shows a year-on-year increase of traffic incidents in the area. For 2017 and 2018, data was not supplied in the assessment, however, looking at TFL's website, the 2017 and 2018 traffic numbers confirm the annual increase in accidents. There will be additional harm caused by additional residents and cars. Section 3.9.8 of the Transport assessment which says *"The Quietway which was installed in September 2017 is likely to further improve safety on the local road network,"* is therefore incorrect due to the rise of accidents after it was implemented. This can be seen in TFL's London Collision Map and statistics.
 - o The trip generation assumption is incorrect and therefore proves that there will be more traffic generated and result in local harm. There is a contradiction in the transport assessment versus what the planning application says.
 - o Transport assessment section 6.2.1 says, *"As the new leisure centre is being built on the footprint of the existing and with similar facilities, it is assumed that there will be a like-for-like replacement in trips and no new trips created as part of the Development."*
 - o Planning Statement sections 7.10 and 7.11 says, *"The current usage of Gurnell Leisure Centre is at its highest and is expected to continue to increase. In 2009 the total number of visits to the centre was 531,201 and by 2016 this rose to 692,906, an increase of 30% in 7 years. In the same period, the number of children enrolled on the Swim School scheme rose from 2,301 in 2009 to 3,741 in 2016, an increase of*

62% in 7 years. It is projected that this demand will continue to rise, as The London Sport borough profile produced in 2017 demonstrated that that 60% of people in Ealing would like to do more sport than they currently do.”

Conclusion

- 7.64 The Transport Assessment has fundamental flaws – it is outdated and based on incorrect assumptions. There will be traffic impacts as a direct result of this development, not only from the introduction of residential but also from the increased visitor number to the new leisure centre. Therefore, harm will be caused because of this development.

Potential other harms – Parking Displacement

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

COMMENTS AND MITIGATION FROM PLANNING STATEMENT
Mitigations Proposed • Relocation of the existing ground level car park into the basement • Policy compliant car and cycle parking which responds to the Site’s well connected location. Residual Harm Level • In addition to the underground car park, the Transport Assessment submitted with this application illustrates the numerous streets within close proximity to the Site that have capacity for additional short-term parking. Residual harm considered to be negligible.

- 7.65 The Parking survey was carried out over 3 years ago and since then car ownership has increased due to an uplift in the number of residents in the area (new housing developments, HMO’s, flat shares, etc).
- 7.66 The parking survey shows that the streets nearby are oversubscribed and only streets farther way (i.e. 0.5 km way) have capacity. Taking the average of streets across such a large area is not realistic because no one will walk more than a few streets to park. Furthermore, the survey does not cover Gurnell Grove estate which is directly opposite Gurnell and currently has free parking. The majority of that estate is affordable housing families which have nowhere else to park and could not afford to pay for a CPZ.
- 7.67 The parking displacement will force residents in the nearby streets to get a CPZ, which will result in a cost burden to homes which would not be having this issue if the proposed residential development wasn’t built
- 7.68 The Travel Plan does not have any plans for monitoring whether new residents of Gurnell will be parking in the nearby streets.
- 7.69 There is no car club provision and therefore the Travel plan is not compliant with Ealing’s Sustainable Transport for New Development (Adopted 2013) which states: “Any development with 75 units or more will need to provide 1 car club for every 100 units unless

all accredited car club operators confirm they are uninterested.” The client does not have any car club provisions on site.

Conclusion

- 7.70 The Planning Statement states that, post mitigation, residual harm considered to be negligible. However, the Parking Survey has fundamental flaws – it is outdated and based on incorrect assumptions. There is no local capacity for additional cars, therefore harm will be caused from parking displacement.

Potential other harms – Noise

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

COMMENTS AND MITIGATION FROM PLANNING STATEMENT
Mitigations Proposed • Suitable insulation proposed at non-residential / residential interfaces and as part of the development’s façade • Noise limits set for the mechanical and plant noise generated by the development • Glazing for facades facing Ruislip Road East of a specification beyond that of standard thermal double glazing; • Planning conditions to ensure noise and vibration levels during construction are not undue. Residual Harm Level • As demonstrated in the Noise Assessment submitted as part of this application, with the mitigation proposed the development would provide a suitable noise environment to protect the amenity of future and existing residents –both within the development itself and within the wider context. Accordingly, no residual harm anticipated.

- 7.71 The Planning Statement states that no residual harm is anticipated from the development.
- 7.72 During the construction phase, which is due to last around 5 years there will be significant noise from the building work - this development will require significant foundational work and piling 30m deep. Traffic generation and noise will also be increased during this period.
- 7.73 Given the size and scale of the new leisure centre and residential development, it is not logically possible that there will not be an increase in noise generated in this location which currently has no residential and a smaller leisure centre.
- 7.74 Many the properties will be facing onto Ruislip Road East and Peal Gardens and there will be hundreds of balconies. High specification glazing maybe in place but with windows open and residents on balconies noise pollution will be an issue.
- 7.75 Additionally, the increase in traffic generation will cause additional noise in the area.

Conclusion

- 7.76 The Planning Statement asserts that there will be no anticipated impact from noise. Given the size and scale of the leisure centre and residential components of the scheme this is unlikely to be the case. Additionally, this assertion is made based on the assumption that there is no increase in traffic which is flawed based on the critique of the Traffic Assessment.

Potential other harms – Air Quality

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

COMMENTS AND MITIGATION FROM PLANNING STATEMENT
Mitigations Proposed • A system of dust mitigation measures to be implemented during demolition and construction, to be secured by planning condition • Mitigation measures to reduce excess emissions from additional road traffic, such as the implementation of Green Travel Plans. • Provision of 20% active and 80% passive electric vehicle charging points • Implementation of NOx abatement technologies Residual Harm Level • As set out in the Air Quality Assessment submitted as part of this application, if the mitigation measures are implemented, then during demolition and construction there would be no considered adverse impacts on air quality. During operation the annual mean pollutant concentrations generated by the development, when measured from nearby sensitive locations, would be considered negligible.

- 7.77 The Air Quality Assessment contains significant mistakes and gaps which refute the conclusion that the proposed development is “Air Quality Neutral.” Furthermore, these mistakes highlight the fact that there is more harm to people and the surrounding environment than the assessment identifies.
- 7.78 In the assessment, the Construction phase is incorrectly estimated to be 2 years (see Table 19.) The Construction Management Plan clearly says 5 years. This means that the extra 3 years of construction impact has not been considered in the assessment. For example, there will be 150% more HDV trips adding air pollution, there will be additional local traffic congestion due to HDV entering/exiting the site, impact of construction dust for a longer duration, etc. Therefore, even with the planned mitigations, the overall air quality will be impacted negatively.
- 7.79 Ecological impacts from the earthworks, construction and track out have not been considered. Given the immediate proximity of the parkland and proximity of two areas of SINC designation, this could cause significant harm to the environment. See Air Quality Assessment, Section 4.4.1, Tables 17 and 18. Also, there is the new BMX track, which is within the application boundary of the Gurnell area and will have a degree of construction. This should be assessed for cumulative impact on the environment.

- 7.80 The Air Quality Assessment (section 4.4.1) assumes that construction traffic would access the site only from Ruislip Road East. According the Construction Management Plan, there is a second key access point for construction traffic on Argyle Road. Given the significant HDV trips and potential road traffic disruption, more sensitivity receptors should represent Peal Gardens. This again suggests that the air quality assessment is not representative of the actual construction plan.
- 7.81 Another large local development has been approved (postcode UB6 8TF, application 194353FUL for 57 flats) within the 350m construction impact radius which has not been considered. See section 3.3.2 of the Air Quality Assessment.
- 7.82 The assessment has not captured the homes that will be the most impacted from the dust and operational pollution. In section 4.4, the selected dust and operational sensitive receptors from Peal Gardens are 8 and 15 (Peal Gardens 88 must be erroneous as there is no such address.) These addresses do not represent the homes which are closest to the site and have windows facing west, into the proposed development. Table 19 says, "The wind direction is predominantly from the south- west and west of the development, as shown in Figure 5. As such, properties to the north-east and east of the site would be most affected by dust emissions." Peal Gardens homes 24-27 have windows facing west and are 20 meters from the proposed Block F. Peal Gardens 24-27 should have been included in the assessment. Therefore, there is a strong argument that air quality impact assessment has not been accurately assessed because the homes with the most impact have not been included.
- 7.83 The air impact assessment from traffic pollution (Appendix 2) is flawed because it uses the 2017 Traffic Survey data by Systra. The survey was done over 3 years ago and does not represent an accurate view of the significant changes in local road transport since the survey was done. Specifically:
- o Incorrect width of Ruislip Road East, because a traffic lane was removed since the survey was done. There used to be two east bound lanes on Ruislip Road East, now there is only one. The visible consequence of the lane reduction is that traffic heading eastbound gets backed up from the Ruislip Road East/ Argyle Road roundabout. This results in a noticeable amount of increased traffic which leads to more traffic noise and air pollution.
 - o The speed limits have changed. The assessment shows mean vehicle speeds which represent the old speed limit of 30mph. New survey data to represent the new speed limit of 20mph has not been provided and assessed. This again is not an accurate representation of traffic conditions and therefore results in a flawed assessment.
 - o The traffic survey does not identify or assess the impact caused from the construction traffic on the local roads for 5 years (entry & exit points from the construction site.)

Conclusion

- 7.84 The Planning Statement asserts that there is negligible impact to air quality. However, The Air Quality Assessment contains significant mistakes and gaps and the harm to people and surrounding environment has been understated and there will be significant harm caused.

Potential other harms – Sunlight and Daylight

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

COMMENTS AND MITIGATION FORM PLANNING STATEMENT
Mitigations Proposed Within the constraints of the optimal residential and leisure centre quantum, the development's design is as such so: • The tallest elements are clustered in the centre and towards the park, positioned as far from existing neighbouring properties as possible • Buildings have been split into blocks, reducing the bulk and massing and allowing increased light into public areas and to courtyard windows of the proposed residential units. • Buildings along the eastern side are orientated inwards to maximise the built distance to Peal Gardens, with a resulting separation of 20 metres • The buildings nearest Peal Gardens are the lowest within the proposed development, at six storeys • The closest building to properties on Ruislip Road East are at least 30 metres from windows of existing properties. The height of this element around the south east corner is as such to improve the daylight and sunlight for neighbouring properties. Residual Harm Level Whilst the relative change between existing and proposed is significant, this is due to the existing site being low-rise and, in most part, completely undeveloped. Whereas the resulting daylight and sunlight levels received by neighbouring properties as proposed is more akin to the London environment. As proposed, 57% of surrounding windows will adhere to the BRE Guidelines for the Vertical Sky Component. Whilst this degree is below the nationally applicable recommendations set out in the BRE Guidelines, the guidelines themselves alongside the NPPF 2019 recognise the need for local authorities to adopt a flexible approach to sunlight and daylight considerations – particularly where these may otherwise prejudice the delivery of a sustainable site. 83% of surrounding windows will adhere to guidelines for No-sky Line. Further, 94% of rooms will adhere to guidelines for sunlight. As set out in the Overshadowing and Daylight Report submitted as part of this application. Within a London context these levels are suitable, with the properties themselves generally retaining a good level of daylight. Within the development itself 94% of the rooms assessed meet the requisite Average Daylight Factor standards, which is considered to be an excellent rate of compliance for scheme of this nature. Accordingly, adverse impacts and residual harm from a sunlight and daylight perspective are considered to be minor to negligible.

- 7.85 The impact of lost light and overshadowing to the surrounding homes is being diminished by a flawed argument which compares light levels with those in urban London. The proposed site is not an urban site and therefore creates significant harm to the existing residential buildings next to the development.

7.86 In the Planning statement, section 8.118 Daylight and Sunlight, it states, " Policy 7.6 of the London Plan outlines that buildings should not cause unacceptable harm to the amenity of surrounding land and buildings, particularly residential buildings, with regard to overshadowing. This is a view carried into draft London Plan Policy D4 which states that the design of development should provide sufficient daylight to new existing housing that is appropriate for its context."

7.87 Therefore, the following breaches exist:

- Section 5.13 of the Daylight Sunlight and Overshadowing Report (Part 1 of 3) identifies 55 surrounding properties where the assessment indicates that they breach BRE guidelines. The proposed site is on MOL so the properties that are impacted should not be impacted in the first place. The 52 homes are:
 - o Peal Gardens: 5,6,7,8,14,24,25,26,27
 - o Ruislip RE: 11a,15,17,19,21,23,25,27,29,31
 - o Wentway Court: 1,2,3,4,5,6,7,8
 - o Pelham Place: 1-16, 17-22, 23-28

Note: Wentway Court was not identified correctly in the report. There are 8 homes in total.

7.88 The daylight and sunlight assessment does not assess or evaluate the impact of shade to the MOL and parkland. They have provided an "informative" view only. This breaches Policy 7.6 because they have not assessed the impact to the "surrounding land."

Conclusion

7.89 The Planning Statement asserts that there are minor to negligible impacts to sunlight and daylight, however this assessment has been made using an altered baseline position. Even with this baseline, a significant number of existing properties are non-compliant with the guidelines. The assessment also takes no account of the impact of overshadowing on the MOL parkland itself. Therefore, there will be substantial harm to both MOL and non-MOL as a direct result of this development.

Potential other harms – Ecological impacts

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

COMMENTS AND MITIGATION FROM PLANNING STATEMENT
Mitigations Proposed • Seek to retain where possible the existing SINC. Any loss will require appropriate compensation, such as additional soft landscaping and tree planting, species-rich grassland and wildflower planting • The possibility of extending the SINC is being discussed favourably by LBE. If approved this would be considered significant at the local level • Further surveys required to ascertain the presence of bats or their habitats • Measures should be taken to avoid disturbing or killing birds, hedgehogs and communities of invertebrates

Residual harm level

The loss of an area of SINC is proposed to be lost. Whilst this is adjacent to a well-lit road and thus likely to contain fewer protected species such as bats, nonetheless its loss is still significant. However, if the requisite mitigation measures are implemented then, as per the Ecological Survey submitted as part of this application, it is considered there would be no residual harm with a view towards there being a likely improvement above current levels in the long-term. This improvement would be significant if an extension to the SINC is accepted by LBE.

In terms of adverse impacts on protected habitats and species across the development site, again, if the mitigation measures are implemented then there is anticipated to be no residual harm.

7.90 The proposal will create significant harms to the ecology and habitats of the area.

7.91 There are significant gaps and flaws in the Ecological Appraisal, Biodiversity Assessment and Bat Roost Assessment, therefore, they do not represent a full account of potential ecological impact.

- The Ecological Appraisal does not consider the impact of the BMX park development. Section 1.5 states, *“The remaining areas of the River Brent and Brent River Park North SINC and **the area of site to the west of the River Brent will be retained by the development and protected throughout works.**”* Protecting the SINC is not possible due to the planned BMX track. Therefore, the appraisal is flawed and there will be major harm to the ecology and the MOL.
- The proposal will harm bats. It breaches the recommendation from the Bat Roost Assessment section 5.2 which says, *“The Brent River Park North: Hanger Lane to the Great Western Railway SINC, which falls within the site boundary, **must not be affected by the development.**”*
- The lost SINC from the BMX development is not factored into the net biodiversity calculation. Therefore, the resulting net gain is flawed and overstated. This is likely to generate a net biodiversity loss.
- The net biodiversity calculation does not cover species (i.e. bats) and therefore the Defra metric is currently incomplete as it does not consider ecological functionality or the intrinsic value of wildlife. Bats, for example, require hedgerows to help navigate around the landscape. For some species, hedgerows are an irreplaceable habitat and their removal can have significant adverse impact on those species ability to get to foraging areas. The assessment must be based on both habitat functionality and the functionality for the species that the landscapes and habitats support, irrespective of the features of the site. Therefore, the true harm to nature is not fully assessed and understood.
- The hedgerow condition assessment is too simplistic, as it does not consider species diversity or value for wildlife (i.e. bats). Therefore, the harm caused by the removal of mature hedgerow is understated.

- There is no assessment of the Brent River habitats. Therefore, there could be harm to wildlife habitats in the river.
- 7.92 Further to the potential damage, the mitigation proposed could also be damaging because old meadows, neutral and acid grassland are habitats that cannot easily be recreated. Enriching grassland or scattering wildflower seed does not make up for a nature conservation site or support the fauna associated with old sites. That is why Ealing's Biodiversity Action Plan has identified these habitats as special.
- 7.93 The Bat Roost Assessment has expired (section 2.21). Only a building inspection was recently re-done and therefore does not represent a recent full account of a bat roost assessment. A dusk emergence and dawn re-entry would need to be re-done because the identified Pipistrelle bats are known as a building dwelling species and certain parts of the building have never been inspected due to lack of access (see section 2.19 and 2.20).
- 7.94 Some proposed mitigations could be damaging because old meadows, neutral and acid grassland are habitats that cannot easily be recreated. Enriching grassland or scattering wildflower seeds does not make up for a nature conservation site or support the fauna associated with old sites. That is why Ealing's Biodiversity Action Plan has identified these habitats as special.
- 7.95 Ealing's Biodiversity Action Plan (BAP) is relevant and applies (particularly the Neutral & Marshy Grassland and Hedgerows Habitat Action Plans) but has not been followed. The hedgerows in and around Gurnell car park are mixed native species and Ealing's BAP policies apply. The old hedgerow along the Ruislip Road is of high value and again Ealing's BAP policies apply.
- 7.96 London Borough of Ealing has a statutory duty (NERC 2006 S40) to 'have regard to conserving biodiversity'
- 7.97 The Brent River Park Countryside Management Plan 1990 applies but has not been referred to.

Conclusion

- 7.98 The Planning Statement asserts that there will be no residual harm, however there are several flaws with the Ecological Appraisal, Bat Roost Assessment, and the Biodiversity Net Gain calculation. Most notable the destruction of a significant area of SINC has not been considered. Therefore, this development will result in substantial harm from an ecological perspective.

Potential other harms – Trees

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

COMMENTS AND MITIGATION FORM PLANNING STATEMENT

Mitigations Proposed

- Planning conditions should be imposed to ensure the root protection areas of retained trees can be preserved
- Protective fencing and construction exclusion zones should be erected around trees to be retained
- Any trees that are proposed for removal should give due consideration to the potential presence of protected species
- In response to the proposed loss of 158 individual trees and two groups, a comprehensive landscaping plan and tree replanting strategy has been developed to mitigate against and address the loss of visual public amenity and ecology. The trees to be replanted should be appropriate to the Site
- The position of new trees and plants should take fully into account the proximity to any new or existing built development

Residual Harm Level

As part of this application, an Arboricultural Assessment was carried out which surveyed the quality and location of all trees across the Site. Whilst a large number of trees are proposed for removal as part of this application, the assessment concludes that if the requisite mitigation works are carried out then, whilst there may be minor residual harm in the short term as the trees and landscaping mature, in the long term there would be a benefit to the Site's increased visual amenity and ecological value

- 7.99 There will be removal of trees and vegetation which is not covered under the Arboricultural Impact Assessment. The scope of the Arboricultural Impact Assessment did not include the scope of the entire application site. The west and north-west part of the site was excluded.
- 7.100 A separate 'informative' Arboricultural survey was done for the BMX application and says, 'It provides information on the current condition of trees at the site, their suitability for retention, and the above and below ground constraints to development.' It is not an impact assessment because the survey was done before the site design details were known.
- 7.101 The BMX design report clearly says in section 4.1 "*Removal of existing trees and vegetation is required for the construction of the track and track facilities. Trees over 100mm diameter are to be removed from site. Smaller shrub vegetation is to be chipped at an agreed location.*" Therefore, there will be tree and vegetation destruction that has not been assessed in terms of its potential impact.
- 7.102 There will be a reduction of local CO₂ absorption for 20+ years. The young trees that are planned to be planted will take 20 - 30 years to reach the size of the 158 trees (and the extra trees to be removed from the BMX park) that will be removed. The young trees will not absorb the same levels of CO₂ as the mature trees.

Conclusion

- 7.103 The Planning Statement asserts that there will be only minor residual harm in the short term and a "*benefit to the Site's increased visual amenity and ecological value*" in the long term. The assessments fail to take into account the removal of trees for the BMX track which has

only been subject to an “*informative*” survey. Any increase to visual amenity through replanting will be far outweighed by the developments towering over them and casting huge shadows across the park. Any increase in ecological value in the long term is debateable and will take decades to be achieved, especially considering the construction period will span 5 years. Therefore, this development will result in substantial harm from an arboricultural perspective.

Potential other harms – Light Pollution

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

COMMENTS AND MITIGATION FORM PLANNING STATEMENT
Mitigations Proposed • The lighting will be designed to ensure energy consumption is minimised and obtrusive light would not be emitted outside the Site’s boundary in accordance with the relevant British Standards and CIBSE Lighting Guides • The lighting locations will be as such to further ensure no upward light is emitted • The final lighting details will be confirmed via planning condition. Residual Harm Level As set out in the External Lighting Assessment submitted as part of this application, the fundamental criteria of the lighting strategy would be to ensure it has no adverse impacts on surrounding dwellings or ecology. Accordingly, with the above mitigation included in the final lighting strategy, it is considered this element of the proposal would result in no residual harm.

7.104 A lighting assessment has been carried out, there are several flaws with the assessment:

- The assessment is an external lighting assessment i.e. streetlights and public amenity areas – this assessment does not include lighting that will be omitted from the residences and leisure centre which will be significant due to the size and scale of the development
- The site has been assessed against an environmental zone of E4, an Urban area. This means that any lighting measurements and mitigations are been compared to an incorrect baseline. There is some current lighting on the site, however the vast majority of the site is open parkland and therefore the environmental zones should reflect this. Most the developed area could be categorized suburban and the park itself may even have lower light levels than this.

Table 1 – Environmental Zones			
Zone	Surrounding	Lighting Environment	Examples
E0	Protected	Dark	UNESCO Starlight Reserves, IDA Dark Sky Parks
E1	Natural	Intrinsically dark	National Parks, Areas of Outstanding Natural Beauty etc
E2	Rural	Low district brightness	Village or relatively dark outer suburban locations
E3	Suburban	Medium district brightness	Small town centres or suburban locations
E4	Urban	High district brightness	Town/city centres with high levels of night-time activity

Table 2 – Obtrusive Light Limitations for Exterior Lighting Installations – General Observers						
Environmental Zone	Sky Glow ULR [Max %] ⁽¹⁾	Light Intrusion (into Windows) E _v [lux] ⁽²⁾		Luminaire Intensity I [candelas] ⁽³⁾		Building Luminance Pre-curfew ⁽⁴⁾
		Pre-curfew	Post-curfew	Pre-curfew	Post-curfew	Average, L [cd/m ²]
E0	0	0	0	0	0	0
E1	0	2	0 (1*)	2,500	0	0
E2	2.5	5	1	7,500	500	5
E3	5.0	10	2	10,000	1,000	10
E4	15	25	5	25,000	2,500	25

Tables from the External Lighting Assessment

7.105 The lighting assessment states:

“The ecologist report states that there is a moderate likelihood that the site contains potential bat roosting and foraging habitats. Therefore, the design will need careful lighting design calculations to ensure that the potential areas are protected. The design will be carefully discussed and developed with the ecologist. Bats, their roosts and their bat routes are protected by law. Illuminating a bat roost or even a known feeding route could result in an offence being committed as the bats are a protected species under the Wildlife & Countryside Act (1981), stating that it is illegal to kill, injure, capture or even disturb bats.”

However, the lighting calculations have not been created or checked with an ecologist and the final lighting strategy has not been produced. Therefore, there could be a significant impact to the local bat population.

Conclusion

7.106 The Planning Statement asserts that there will be no residual harm, however the assessment has a flawed baseline position, identifying the area as “urban”. The scope of the assessment is limited to external lighting only and does not consider the impact to protected species such as bats. Therefore, this development may result in substantial harm from a light pollution perspective.

Potential other harms – Wind and Microclimate

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

COMMENTS AND MITIGATION FROM PLANNING STATEMENT

Mitigations Proposed

- The location of seating and the use of 1.5 metre high hedging where appropriate to ensure comfortable sitting conditions
- The use of 2 metre high 'L' shaped screens on the south west corner
- Chamfering of the south east corner of Block B / the leisure centre
- Solid side screens on the balconies along the eastern façade of Block B
- 1.5 metre high screening around the seating areas on the proposed podium garden deck
- These details will be secured via planning condition as part of the detailed design process.

Residual Harm Level

With the above mitigation carried out, the Wind and Microclimate report submitted as part of this application confirms that, in all locations around the development, conditions would be suitable for the intended use with no safety exceedances. Accordingly, there would be no residual harm in this regard.

- 7.107 The Wind and Microclimate report clearly states in its executive summary, *"The objective of this study was to determine the ground, balcony and terrace level wind environment within and around the Proposed Development in London, UK."*
- 7.108 There is no assessment on the potential ecological effects and harm of wind and microclimate on the park environment or its wildlife.
- 7.109 Therefore, the potential harm to the park and its wildlife is unknown and requires further assessment to ensure it is not impacted. Given several mitigations had to be added to the design to ensure that dangerously windy conditions were mitigated, it is reasonable to assume there may be further impacts that have not been identified.

Conclusion

- 7.110 The Planning Statement asserts that there will be no residual harm, however the assessment fails to consider the potential impact to the park and its wildlife. Therefore, this development may result in substantial harm from a wind and microclimate perspective.

Potential other harms - Heritage

COMMENTS AND MITIGATION FROM PLANNING STATEMENT

Mitigations Proposed

- A planning condition should be imposed that requires an archaeological watching brief

Residual Harm Level

The Built Heritage Statement submitted with this application confirms the scheme would have no adverse impacts on the significance of the surrounding built heritage assets by virtue of their distance from the Site. In terms of archaeology, whilst the Site is located within a designated Archaeological Priority Area it is considered to have a low archaeological potential. Accordingly, the imposition of the above planning condition will provide comfort of no residual harm.

7.111 There are 5 heritage assets in the locality of the site:

- Cuckoo estate Conservation area
- Hanwell Community Centre (Grade II listed building, NHLE ref: 1358760)
- Church of St Mary the Virgin (Grade I listed building, NHLE ref: 1079402)
- Colleton Tomb, St Mary the Virgin Churchyard (Grade II listed, list entry number 1245218)
- 'Lych Gate to North West of Church of St Mary the Virgin' (Grade II listed, list entry number 1079403)

7.112 The built heritage statement asserts that there is no harm to these assets, however they have not been included within the VIA and therefore this should be revisited to assess the true level on impact.

Conclusion

7.113 The table below outlines the levels of residual harm outlined in the Planning Statement and considers the actual residual levels based on our review of the assessments. The levels of residual harm have been significantly understated and therefore overall, this development will result in substantial harm to both MOL and other harm.

AREA	RESIDUAL HARM LEVEL (PLANNING STATEMENT)	ACTUAL LIKELY RESIDUAL HARM LEVEL
MOL Openness	Significant adverse impacts at the Site's southern end – decreasing in harm towards the north	Very substantial harm
MOL usability	No harm	Moderate harm
Transport Impacts	No harm	Substantial harm
Parking Displacement	Negligible residual harm	Substantial harm
Noise	No harm	Moderate harm
Air Quality	Negligible residual harm	Substantial harm
Daylight and Sunlight	Minor to negligible harm	Substantial harm
Ecological impacts	No harm	Substantial harm
Trees	Minor short-term harm, though becoming a benefit in the long term	Substantial harm
Light Pollution	No harm	Moderate harm likely – needs further assessment
Wind and Microclimate	No harm	Moderate harm likely – needs further assessment
Heritage	No harm	Minor harm

7.114 In addition to these harms, there are several areas of non-compliance to Ealing Local policy which are highlighted in APPENDIX 6. ADDITIONAL PLANNING POLICY ON GREEN AND OPEN SPACES

Potential benefit to MOL

7.115 The Planning Statement section 7.59, table 10 outlines the potential benefits to MOL the Applicant foresees. Each of these areas has been addressed in turn, identifying the consequence of each “benefit”

Nature of potential benefit to MOL – Enhancements to Outdoor offer

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

BENEFITS OUTLINED IN THE PLANNING STATEMENT
Whilst the exact nature of the enhancements are set out above and in the accompanying design and technical documents, the MOL-specific benefits these enhancements provide include: • Improvements in overall MOL quality, usability and accessibility in accordance with NPPF paragraph 141, current London Plan Policy 7.17 and draft London Plan Policy G3 • Provision of designated walking and cycling routes to allow the public to access and enjoy the entirety of the MOL parkland – when currently no such paths exist • The installation of a bridge across the River Brent which, alongside the creation of these new walking routes would contribute towards LBE’s aspiration of creating a Greenford to Gurnell link • Flood mitigation measures to make the parkland useable and safe for a far greater proportion of the year than current • The creation of new planting areas and natural interventions will, in the long term, increase the biodiversity value of the Site by providing new habitats and growing environments. This is in accordance with LBE’s Core Strategy Policy 5.2, which regards the requirement to protect and enhance MOL • The creation of different types of landscaped space, including the new courtyard, allow for substantial flexibility for different informal sporting and leisure activities – a substantial improvement on the current offer In this respect, Appeal Ref: APP/G5180/W/18/3206569 (allowed on 26th June 2019) is relevant which was pursuant to a residential proposal on PDL elements of MOL - refused by the London Borough of Bromley (LPA Ref: 18/01319/FULL1). As part of the scheme, extensive enhancements were proposed to the accessibility of the existing non-PDL elements of MOL. In this instant (and notwithstanding the other VSC matters considered as part of this application) the Inspector considered that “very significant weight” was attached to the open space enhancements as part of the VSC argument on the basis of its compliance with NPPF paragraph 141. In this respect, it should be noted that the MOL being enhanced as part of the Bromley proposal was 1.12ha. The GLC enhancements however cover almost 6ha.

7.116 Overall MOL quality will be degraded with this proposal and therefore it should be noted that the harm caused by this proposal outweighs the improvements. There are flaws with various assessments which in turn, produce inaccurate statements about improvements.

Additionally, they do not consider certain harms which are important to people and the ecology. These can be summarised as:

- Overall loss of SINC and habitat for bats because of the BMX track development. LBE has a statutory duty (NERC 2006 S40) to 'have regard to conserving biodiversity.'
- Overall loss of trees as a result of both the Gurnell and BMX track development.
- The Net Biodiversity assessment and calculation of +16.23% are flawed because they do not factor in the west part of the site and the impact of the BMX track development (loss of trees and loss of SINC.) The assessments clearly say that area must not be developed yet it is planned for development. This would likely generate a net biodiversity loss.
- Given the various flawed ecological assessments (see Ecological impacts section) and the lack of an EIA, it can be argued that the full extent of the harm to the MOL is still not known. A full EIA would be needed to provide a comprehensive assessment of this proposal.
- Due to the proposed high-rise development and the shadows it will cast into the park, the loss of sunlight (and overshadowing) will be significant compared to the current levels. The tall buildings and shadows create an urbanising effect on the park which is currently unharmed by tall buildings. This harm has not been considered.

7.117 Furthermore, it can be added that improvements to usability and accessibility to the parkland could be implemented without this proposal. The Mayor of London has granted LBE £325,000 to improve the Gurnell to Greenford Greenway. Therefore, funding from that scheme can be used to further enhance the park usability and accessibility without high rise tower blocks or a BMX track.

Nature of potential benefit to MOL – Design Quality of the Leisure Centre

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

IMPACTS OUTLINED IN THE PLANNING STATEMENT
As set out above and in more detail in the submitted Design and Access Statement, the current leisure centre orientation and materiality does not relate well to the MOL. It is non transparent and protrudes into the park, its orientation blocks visual and physical access and its raised setting with changes in level create a separation between the leisure centre and park land. In addition, it lacks a defined presence and fails to provide a sense of its landmark location and function. The proposal will therefore: • Open the leisure up to the MOL with a materials palette that is more sympathetic to the natural context and lighter in weight and severity • Provide the leisure centre with a degree of transparency, inspiring users of the wider MOL park to similarly engage in sporting and leisure activities • Provide additional MOL parkland to the northern end of the leisure centre, with the proposed footprint reoriented more towards Ruislip Road East

- 7.118 The proposed leisure centre is not sympathetic to the natural context and imposes itself (with its two 15-storey brick towers) onto the MOL. It is heavier in weight and severity, and its high skyline creates a negative visual impact to its surrounding. Many leisure centres built by Wilmott Dixon can qualify their design as a benefit but for the Gurnell proposal, the addition of the two residential towers on top of the leisure centre is a design mistake (both visually and logically because it will make a future refurbishment or replacement even more expensive.)
- 7.119 The current leisure, while it lacks in materiality and orientation, is set back from the road and within mature trees which conceal it and help it to blend into the parkland.
- 7.120 The proposed leisure centre does not take advantage of its location with respect to the parkland visual amenity. The gym, studios and children's water play area all face Ruislip Road East. Only the swimming pool faces into the park. There is an overall net loss visual amenity for leisure centre users because the current leisure centre has studios and the swimming pool facing into the park.
- 7.121 There is no additional MOL parkland being provided or created. There is actually a net loss of MOL and more of the park will become developed (albeit for sporting activities) due to the four-fold increase of the BMX track and increased play space provision for the children generated from the development

Potential benefit to non-MOL

- 7.122 The Planning Statement section 7.59, table 11 outlines the potential benefits to non-MOL the Applicant foresees. Each of these areas has been addressed in turn, identifying the consequence of each "benefit".

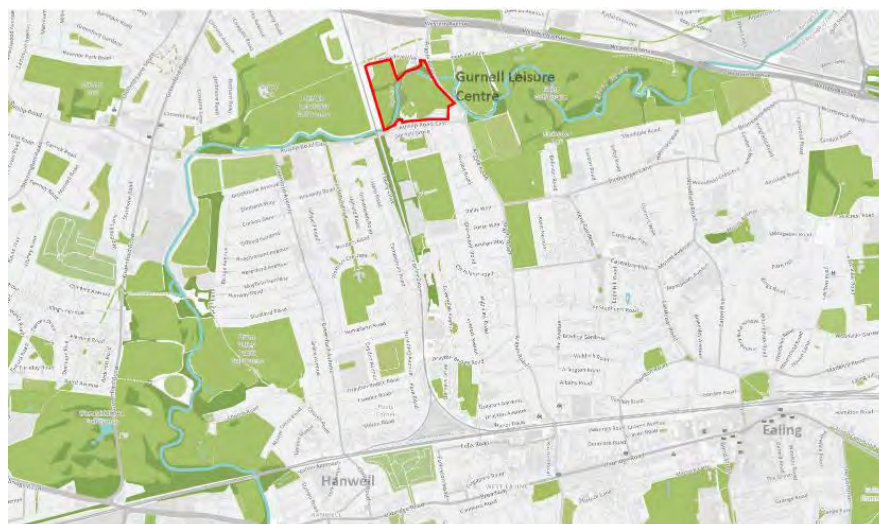
Nature of potential benefit to non-MOL – Additional sporting capacity

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

BENEFITS OUTLINED IN THE PLANNING STATEMENT
Fundamental as part of this application is the provision of a state of the art leisure centre that, designed in accordance with the brief from LBE, will meet the borough's requirements for the additional required sporting capacity set out in LBE's Sports Facility Strategy 2012-2021. Key benefits associated with the leisure centre are: • Establishing this area as a much-needed sports hub, required by LBE Core Strategy Policy 5.6 • The strengthening of local communities by providing them additional and higher quality sporting facilities. It will also inspire the Ealing Swimming Club, already the largest in the country, to continue to gain support • The national importance of encouraging sporting participation for all sections of society and the resulting mental and physical health improvements this would result. This should be noted alongside the implications of this Full Application being refused, which would result in the existing leisure centre, with insufficient funding, having to close

- The new leisure centre, with a significantly upgraded 50 metre pool would increase its regional role within London as a whole, incentivising further economic investment in, and development of the borough's sporting provision
- In addition, linked to the proposal a new BMX track and skatepark to the benefit of Ealing BMX Club and Ealing Skatepark Association (respectively) alongside any more ad-hoc users will be provided
- The larger leisure facilities will provide additional jobs for members of the local community
- As a modern facility built to be state-of-the-art, it will incorporate sustainable technologies to ensure it operates with ultimate efficiency. This is something the current leisure, built in 1981, would not allow for without substantial and costly retrofitting
- Medium-term employment creation in the construction of the proposal

- 7.123 The focus has been swimming with no benefits being considered for other Gurnell user groups.
- 7.124 Harm will be caused to the members of the "Anti-Stress yoga class" which is reliant on the current studio which faces into the park. The class focuses on meditation, relaxation and yoga in a quiet room while looking into the green park. In the new leisure centre, the studios will face onto the busy Ruislip Road East and therefore none of the new studios can be used for this purpose.
- 7.125 Currently there is a separate gym which is used for a female only timeslot. The proposed gym is all on one floor with no means of dividing the area to create a more private exercise space.
- 7.126 Lost opportunity is an aspect of harm. There is lost opportunity because the proposed leisure centre falls short of being state-of-the-art. There is no multi-use sports hall, climbing wall, or hydrotherapy suite for people with disabilities or local athletes. These are all typical features of state-of-the-art leisure centres and Gurnell will not have any of these.
- 7.127 Medium and Long-term loss of employment to the car wash business and the 4-8 employees that operate in the current car park. Also, to the existing local shop in Gurnell Grove – the new development has two retail units which could easily take the shop's current customer base.
- 7.128 The proposed BMX track (which is circa four times larger than the existing one) will remove a significant piece of SINC and green space which reduces the green way corridor. Green open space will be converted to PDL and there is a risk that this become further developed in the future, of the track and ancillary buildings extend into the other half of the meadow.



Map showing the green corridor and bottleneck in the Gurnell area.

- 7.129 The Skate Park is also being relocated to a more central position within the park and will give the park itself a more “urban” feel.
- 7.130 Increased traffic, pollution and parking problems generated from the increased membership. The applicant has provided no mitigation for these impacts.

Nature of potential benefit to non-MOL – Park enhancements

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

BENEFITS OUTLINED IN THE PLANNING STATEMENT

The MOL focused benefits of proposed enhancements to the wider MOL parkland are set out above. Other benefits of enhancements to the park land include:

- Making the parkland safer and more attractive to wider members of the community. This will ensure it is better integrated and far better used by residents than the current space
- By making it easier to walk and cycle, encouraging members of the community to partake in a greater variety of outdoor sporting activities
- The better used open parkland will be designed to maximise opportunities for social interaction, supported by the new retail opportunity also provided on site. This will facilitate the creation of stronger communities, and increased senses of inclusion and safety
- The proposed reconfiguration would bring the facility closer to South Ruislip Road, providing an active frontage and better establishing it in the wider public realm

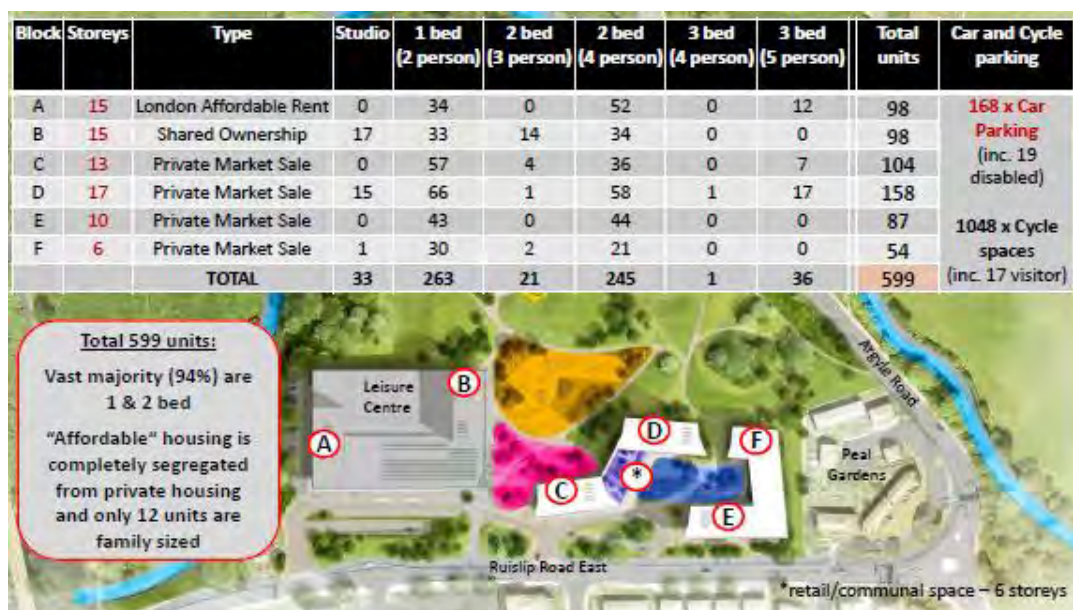
- 7.131 One method that may be used to make the parkland safer may be the use of additional lighting which may have a detrimental impact to local wildlife, particularly bats.
- 7.132 There are no additional outdoor sporting activities proposed, in fact two grass football pitches will be lost. There is nothing in place to encourage “*members of the community to partake in a greater variety of outdoor sporting activities*”.

- 7.133 The playground will be increased in size from 1,188 sqm to 3,752 sqm to account from increased demand from the residential element of the proposal. The impact of this is that an additional 2,564 sqm of park will not be usable by the wider public.
- 7.134 Landscaped and manicured parks are not necessarily more attractive than those left to rewild or have a more naturally landscape. To achieve “benefit” a significant amount of habitat, including 158 trees and several native species hedgerows will be destroyed. It will take many years until the park becomes mature again.
- 7.135 The proposed tower blocks will cause significant overshadowing into the park which has not been assessed. This will impact users of the park, including the re-provisioned playground, skate park and at some points of the year, even the BMX track. The park currently receives full sunlight all day, all year round and the costly, newly landscaped park will lose sunlight.
- 7.136 The residential development is entirely segregated by housing tenure and effectively has a “poor door” created. There will be no feeling of inclusion.
- 7.137 The proposal moves the leisure centre closer to Ruislip Road East. There will not be an “active frontage” aside from the entrance. Moving it to this position will make the development more prominent and overbearing as the leisure centre itself is materially larger and will also have two 15 storey tower blocks attached.

Nature of potential benefit to non-MOL – Housing

The following table contains wording from the Planning Statement verbatim. The subsequent paragraphs outline our assessment, comments, and conclusions.

BENEFITS OUTLINED IN THE PLANNING STATEMENT
The provision of 599 additional homes (including 196 affordable homes) which will contribute towards the draft London Plan’s much increased housing target for LBE of 2,807 homes per annum. Further benefits of this housing provision include: • The creation of sufficient funding to facilitate the construction of the leisure centre • The provision of 35% affordable housing (by hab room) • A wide mix of high quality and spacious accommodation to meet the varying needs of the borough’s population • The introduction of a new community in the area, providing additional footfall to the nearby Greenford Town Centre and a new cross section of residents to take advantage of the much enhanced MOL parkland • Medium-term employment creation in the construction of the proposal • The improvement of the public realm around Ruislip Road East, through the creation of active frontages and a better sense of enclosure • The generation of S106 financial contributions to the borough



Gurnell – housing mix and tenure

- 7.138 Sufficient funding is not being generated. The original scheme was meant to be cost neutral to the Council and this has now become a “facilitating” rather than “enabling” development. In any case, as outlined earlier in this document there is no firm foundation in the justification for this development or the estimated price tag of the new leisure centre.
- 7.139 This site is MOL and the core principle is that this should not be developed – a residential development on this site is inappropriate. Ealing has a significant pipeline of development, with an estimated number of 40,000 units recently built, approved, in planning or proposed. This development is not required to meet housing targets and MOL should be protected else all land in the borough will become developed.
- 7.140 There is no social housing in this development. On public sector land the affordable housing target is 50%, this development only has 35%. It is also not actually affordable to residents of Ealing - The 2018 SHMA states that a vast majority of households in Ealing are unable to afford affordable rent.
- 7.141 The Affordable Housing element is not being cross funded by the “facilitating” development. Ealing has received £100M grant funding from the GLA and £10M has been allocated to this project. Therefore 403 units / 4 tower blocks on the right-hand side of the development, which will cause a significant amount of harm to the MOL are in no way responsible for the creation of Affordable Housing in this scheme.
- 7.142 The housing “ticks the boxes” of space standards but is by no means “*high quality and spacious*”. The housing mix is mostly studio, 1 and 2 bedrooms and lacks family units – there are only 37 three bed units and only 12 of these are in the affordable provision.
- 7.143 The density is extremely excessive with 599 units on 1.42 ha giving rise to a density over four times the guidelines in the current London Plan. Given the current pandemic, we should be looking to decrease not increase the density of development.

- 7.144 The Ealing Local Plan requires a majority of housing at “low cost rent” which this scheme does not have.
- 7.145 A new community is unlikely to form here. The London Affordable Rent and Shared Ownership properties are segregated from each other and the rest of the development effectively creating a “poor door” non-inclusive environment. Additionally, the new residents will be unlikely to integrate with the residents of the Gurnell Grove estate forming further segregation across the local area.
- 7.146 Given 403 of the units are market sale and Eco World is an overseas company, it is highly likely that a significant number of the properties will be sold overseas. This could easily be another Dicken’s Yard situation where no community has formed and the “active frontage” is not active at all. Any assumed benefits from the new residents improving the local economy will not materialise as the properties will be empty.
- 7.147 The parkland is not being enhanced. Equally, we don’t need *“a new cross section of residents to take advantage of the much enhanced MOL parkland”*. In the current pandemic and local lockdown, space has been a premium, adding 1,800 new residents will effectively fill up the new park and no additional green space is being created to account for the uplift in residents.
- 7.148 A key aspect of MOL is that it is open, therefore the development should not be stating *“The improvement of the public realm around Ruislip Road East, through the creation of active frontages and a better sense of enclosure”* as a benefit when in previous section it claims no impact to openness.
- 7.149 S106 payments are supposed to mitigate the effects of development, not to be a reason for them. Given the number of developments across the borough, there should be sufficient S106 money to close the funding gap for a new leisure centre and avoid building on MOL in the first place.
- 7.150 The new leisure centre will be reoriented and *“would bring the facility closer to Ruislip Road East”*. This would make the new building much more imposing and overbearing as it is also materially larger than the existing building.
- 7.151 A major consequence of the additional housing will be the additional people and the strain they will cause on the local physical and social infrastructure. There will be increased traffic, parking problems and more pollution.
- 7.152 Based on the housing mix the development could cause an uplift of 1,800 residents. It is highly likely that a significant proportion of these residents will become members of the new leisure centre, and whilst that will increase revenue it will create a capacity strain as soon as it is opens.
- 7.153 Park users will be impacted by the loss of privacy due to the significant number of properties facing the park.
- 7.154 An additional 250 children could be generated from the scheme (based on play space increase from 1,188 sqm current provision to 3,752 sqm increased provision and minimum requirement of 10 sqm per child). Given the proximity of the playground to blocks B, C and D

there is a safeguarding issue in terms of overlooking. The playground will also be overshadowed for large portions of the day across the entire year.

Conclusion

- 7.155 There is no benefit coming from the “design quality of the leisure centre”. The proposals are not sympathetic to the natural context and are imposing as the new centre would be materially larger than the existing one and with two 15 storey tower blocks attached. The internal design is also flawed, providing parkland vistas to the swimmers but views of Ruislip Road East to the gym and exercise studio users.
- 7.156 There are no significant enhancements to the outdoor offer. Substantial harm will be caused as a direct result of this development, including loss of sunlight and daylight, ecological and arboricultural especially considering the loss of a significant area of SINCC. The “park enhancements” outlined simply do not outweigh the harm caused.
- 7.157 The new leisure centre will have little in the way of additional sporting capacity. The pool will have four additional lanes and there will one more extra studio. The benefits are being massively overstated and substantial harm will be caused as direct result of the development.
- 7.158 Ealing’s housing development pipeline is significant, and the council should not be resorting to building on MOL to solve housing needs – this is a leisure centre project, not a housing one. The affordable housing is not even being cross funded by the private development and therefore there is no dependency between the two. There is no social housing and at 35% the level of affordable housing falls far short of the 50% target for public sector land.
- 7.159 To conclude, the benefits have been overstated and there are significant consequences of each of these that has simply not been addressed.

8. SUMMARY OF STATED HARMS AND BENEFITS

- 8.1 In accordance with paragraph 143 of the NPPF *“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”*

Summary and assessment of Harms

- 8.2 The levels of residual harm have been significantly understated and overall, this development will result in substantial harm to both MOL and non-MOL. They include, but are not limited to:
- 8.3 **Impact to openness** - This development will cause substantial harm to openness, both visually, spatially and through the erosion of MOL. The VIA even states that *“the increased building massing would realise a locally significant adverse effect on the purposes and function of the MOL designation”* and the Planning Statement concurs *“there would be a loss of open green views”*. There will be significant urbanising effect of the proposed tall buildings. The site is not designated for tall buildings. Any compensatory measures by means of ecological improvements or landscaping will not be sufficient to outweigh the harm to openness and other harm caused by these proposals.
- 8.4 **Impact to MOL usability** - These proposals would result in the loss of MOL usability in terms of its open and unstructured nature and significant adverse impact to openness and overshadowing. The loss of the surface level car park will create additional strain on parking in local streets (see Parking Displacements section for further details). The park will also become less usable due to the sheer number of additional users, the new development will bring around 1,800 new residents into this site and essentially what is being built here is an amenity space for those residents to the detriment of the existing community.
- 8.5 **Transport impacts** - The Transport Assessment has fundamental flaws – it is outdated and based on incorrect assumptions. There will be traffic impacts as a direct result of this development, not only from the introduction of residential but also from the increased visitor number to the new leisure centre. Therefore, harm will be caused because of this development.
- 8.6 **Parking Displacement** - The Planning Statement states that, post mitigation, residual harm considered to be negligible. However, the Parking Survey has fundamental flaws – it is outdated and based on incorrect assumptions. There is no local capacity for additional cars. Therefore, harm will be caused from parking displacement.
- 8.7 **Noise** - The Planning Statement asserts that there will be no anticipated harm from noise. Given the size and scale of the leisure centre and residential components of the scheme, this

is unlikely to be the case. Additionally, this assertion is made based on the assumption that there is no increase in traffic which is flawed based on the critique of the Traffic Assessment.

- 8.8 **Air Quality** - The Planning Statement asserts that there is negligible impact to air quality. However, the Air Quality Assessment contains significant mistakes and gaps and the harm to people and surrounding environment has been understated and there will be significant harm caused.
- 8.9 **Sunlight and Daylight** - The Planning Statement asserts that there are minor to negligible impacts to sunlight and daylight, however this assessment has been made using an altered baseline position. Even with this baseline, a significant number of existing properties are non-compliant with the guidelines. The assessment also takes no account of the impact of overshadowing on the MOL parkland itself. Therefore, there will be substantial harm to both MOL and non-MOL as a direct result of this development.
- 8.10 **Ecological impacts** - The Planning Statement asserts that there will be no residual harm, however there are several flaws with the Ecological Appraisal, Bat Roost Assessment, and the Biodiversity Net Gain calculation. Most notably the destruction of a significant area of SINC has not been considered (due to the proposed BMX track not being factored into the net biodiversity calculation.) Also, harm to wildlife due to the destruction or impact to habitats has not been considered. Therefore, this development will result in substantial harm from an ecological perspective.
- 8.11 **Trees** - The Planning Statement asserts that there will be only minor residual harm in the short term and a *“benefit to the Site’s increased visual amenity and ecological value”* in the long term. The assessments fail to take into account the removal of trees for the BMX track which has only been subject to an *“informative”* survey. Any increase to visual amenity through replanting will be far outweighed by the developments towering over them and casting huge shadows across the park. Any increase in ecological value in the long term is debateable and will take decades to be achieved, especially considering the construction period will span 5 years. Therefore, this development will result in substantial harm from an arboricultural perspective.
- 8.12 **Light Pollution** - The Planning Statement asserts that there will be no residual harm, however the assessment has a flawed baseline position, identifying the area as “urban”. The scope of the assessment is limited to external lighting only and does not consider the impact to protected species such as bats. Therefore, this development may result in substantial harm from a light pollution perspective.
- 8.13 **Wind and Microclimate** - The Planning Statement asserts that there will be no residual harm, however the assessment fails to consider the potential impact to the park and its wildlife. Therefore, this development may result in substantial harm from a wind and microclimate perspective.
- 8.14
- 8.15 **Heritage** - The built heritage statement asserts that that there is no harm to these assets, however they have not been included within the VIA and therefore this should be revisited to assess the true level of impact.

- 8.16 **Social impacts** – Societal and community harm caused by the lack of inclusion from housing and amenity space segregation.
- 8.17 **Housing impacts** - The proposed housing is not aligned with what Ealing’s needs. There is no social housing, affordable housing should be 50% on public land and there is a lack of family sized units.
- 8.18 **Strategic impacts** - Lost opportunity to provide a much better facility mix and future proofed leisure centre for future generations of Ealing residents. The proposed leisure centre offers very few improvements and given the extremely high cost, its deemed low value-for-money when compared to other similar costed leisure centres that other boroughs have delivered.
- 8.19 **Deliverability** - Lack of financial viability and extremely high delivery risk to Ealing which could delay the new leisure centre beyond 3 years.

Summary and assessment of Benefits

- 8.20 **Enhancements to outdoor offer** - There are no significant enhancements to the outdoor offer. Substantial harm will be caused as a direct result of this development, including loss of sunlight and daylight, ecological and arboricultural especially considering the loss of a significant area of SINC. The “park enhancements” outlined simply do not outweigh the harm caused.
- 8.21 **Design quality of the Leisure Centre** - There is no benefit coming from the “design quality of the leisure centre”. The proposals are not sympathetic to the natural context and are imposing as the new centre would be materially larger than the existing one and with two 15 storey tower blocks attached. The internal design is also flawed, providing parkland vistas to the swimmers but views of Ruislip Road East to the gym and exercise studio users.
- 8.22 **Additional sporting capacity** - The new leisure centre will have little in the way of additional sporting capacity. The pool will have four additional lanes and there will one more extra studio. The benefits are being massively overstated and substantial harm will be caused as direct result of the development.
- 8.23 **Park enhancements** – The park enhancements are completely overstated, and the harm caused by destruction of natural habitat will outweigh any stated benefits. The proposed landscaping is not safeguarded and therefore could be removed if the developer’s build costs overrun.
- 8.24 **Housing** - Ealing’s housing development pipeline is significant, and the council should not be resorting to building on MOL to solve housing needs – this is a leisure centre project, not a housing one. The affordable housing is not even being cross funded by the private development and therefore there is no dependency between the two. There is no social housing and at 35% the level of affordable housing falls far short of the 50% target for public sector land.
- 8.25 To conclude, the benefits have been overstated and there are significant consequences of each of these that has simply not been addressed.

Conclusion

- 8.26 In accordance with paragraph 144 of the NPPF *“When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. ‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”*
- 8.27 There is strong evidence in this document to prove that the harms have been overlooked, understated and have not been given substantial weight. The potential harm to the MOL and other harm is substantial and is not clearly outweighed by the stated benefits. Therefore “very special circumstances” do not exist and planning permission for either scheme should not be granted.

9. BUILDING ON MOL LAND - DO VERY SPECIAL CIRCUMSTANCES EXIST?

- 9.1 The fact that Gurnell Leisure Centre (GLC) needs updating is not in dispute. However, this proposal is for a much larger development on protected Metropolitan Open Land. When tested against planning policy it is clear this would be completely inappropriate. No circumstances exist that could justify departing from crystal clear policy as is now proposed.

Metropolitan Open Land

- 9.2 The GLC site is Metropolitan Open Land (MOL). It merits its designation under all four criteria in the existing London Plan (Policy 7.17D) and the New London Plan (Policy G3). This is because:
- it is clearly distinguishable from the built-up area to the south
 - it includes open air facilities, especially for leisure, recreation, and sport,
 - As a SINC, it contains features and landscapes of metropolitan value
 - it forms part of a Green Chain or a link in the network of green infrastructure
- 9.3 Policy 7.17B of the Existing London Plan provides that *“the strongest protection should be given to London’s Metropolitan Open Land and inappropriate development refused except in very special circumstances”*, *“Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL”*. Para 8.3.2 of the NLP gives MOL similar levels of protection.
- 9.4 The supporting text for LP Policy 7.17 confirms that *“appropriate development should be limited to small scale structures to support outdoor green space uses and minimise any adverse impact on the openness of MOL”*. Policy G3A(1) is still more clear: *“Development proposals that would harm MOL should be refused. MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt.”*
- 9.5 While it can be argued that replacement of the leisure centre would provide enhancement (albeit negligible) to *“facilities, especially for leisure, recreation, sport”*, the current proposals would have a devastating impact on the site’s openness. The proposed development is neither small scale (599 units in towers of up to 17 storeys – by far the tallest structures in the surrounding area and more than four times as dense as allowed under the current London Plan), nor does it protect the openness of MOL, and should therefore be considered inappropriate.
- 9.6 The developer’s claim that: *“improvement of the public realm around Ruislip Road East, through the creation of active frontages and a better sense of enclosure”* betrays a singular lack of understanding of MOL which is that it should not introduce any sense of enclosure, nor should it create the kind of active frontages that may be desirable in more central locations.
- 9.7 Likewise, the removal of the BMX track away from the leisure centre to a different part of the GLC site, would adversely affect its new location, a SINC within the main MOL site.

Leisure Centre Funding

- 9.8 The decision to replace GLC was approved, without public consultation, at the March 2015 Cabinet meeting. The Planning Officer's report states that:

"The replacement would be funded via enabling residential development on the site to fund part of the construction costs of the facility, whilst adding to the housing provision in the borough."

By ignoring Gurnell's MOL status at this point, the decision to proceed with the development was flawed from the outset.

- 9.9 It is not tenable to argue that special circumstances exist to justify residential development on this protected MOL land. Ealing already has more than an adequate number of sites and developments in the pipeline for it not to have to build on MOL land. There are 40,000 housing units recently built, approved, submitted for approval, or proposed on major sites. These numbers do not include developments on minor sites or B1 changes of use of which there are plenty. This is more than enough to deliver Ealing's increased housing targets under the New London Plan.
- 9.10 There is no argument either that development on MOL is required to secure extra affordable homes. In this case, and unlike many developments elsewhere in Ealing, the affordable housing element would not be cross funded by enabling development in the form of market housing. Instead it would be paid for using £10 million of GLA grant funding - money that could be allocated to council owned sites elsewhere in the borough.
- 9.11 As the Officer's report to the 2015 Ealing Cabinet states, it has been the case since the outset that Ealing Council would have to fund a substantial share of the leisure centre, some £12.5 million. According to Sport England, it would be possible to deliver most of the facilities that were specified by LBE in March 2015 in a sustainable form for £18 million.
- 9.12 The financial burden for the Council is exacerbated by the excessively high specification that the Council adopted for this site even though it always knew it had no budget for it. The FVA suggests that the construction costs of the replacement leisure centre are now surpassing £37.7 million. This follows repeated LBE's downgrading of the leisure centre specification. This figure is far in excess of Sport England published estimates of the costs of providing new Community facilities.
- 9.13 Finally, it is important to say that if LBE needs additional funds to complete a piece of social infrastructure of this nature, it has had every opportunity to raise money through S106 or CIL payments which are designed for this purpose. The scale of new residential development in the borough has provided every opportunity to close the funding gap for the new leisure centre and negate the need to build on this protected MOL site.

10. RECOMMENDATIONS

Our recommendations are set out as follows:

Immediate Decision

Do not grant planning approval for the current Gurnell or BMX applications.

Review and re-plan

The applicant must revisit and review the options again and prepare a business case. This should be for the leisure centre with the existing surface level car park and without the “enabling development”.

The applicant must obtain a new survey of Gurnell leisure centre (the last one was carried out in 2012) along with quotes for remedial works and refurbishment options. This should include:

- Remedial works should be done to extend the current leisure centre for another 12-24 months to allow enough time for a new proposal to be submitted.
- Cost of refurbishment as-is (replace roof, replace plant room, and cosmetic changes.)
- Cost of a more complex refurbishment that could look at utilising certain shell elements but making significant design changes such as a new type of roof, increase pool to 8 or 10 lanes (with a new moveable floor,) redesign children’s play pool, redesign the gym/studios and potentially find space to offer additional facilities such as a climbing wall, café, etc.
- New leisure centre options (from Wilmott Dixon via Scape framework) with various facility mixes
- Review possibility of increasing size of current BMX track on existing site (allowing it to remain open during the refurb or build).

Better community engagement and consultation

A transparent and much improved consultation process which would conduct survey’s to Gurnell users and the wider Ealing community on what facilities are important to their health and wellbeing. This should be considered as a strategic initiative for public health and how we can save costs to the NHS. The results should be made public.

Reassess funding options

- The council already have £12.5M committed.
- Since the new proposal will not include housing or major changes to the current MOL, many of the pre-app assessments can probably be updated without significant additional cost.
- The review of further funding options should include:
 - o Council reserves
 - o S106 funds from the significant development pipeline in Ealing
 - o Grants from Sport England and other sports bodies.
 - o Borrowing - The council has access to a range of borrowing at very competitive rates through the Public Works Loan Board.

- o Create a sinking fund for the leisure centre.
- o Improved Internal rate of return (IRR.) Typically, a new leisure centre on its own will take 15-24 months to build. This would be better than the current proposal which would take at least 3 years and therefore generate a better IRR for the applicant.
- o There could be cost savings achieved by using resources within the local community instead of hiring companies which are expensive and do not have any sense of ownership in the area. For example, surveys, the coordination of consultations, the management of a project website and social media campaigns could all be run by a local community group of volunteers. The applicant should consider leveraging this opportunity as it will achieve cost savings and give the community a sense of ownership with the project. The community group Save Gurnell would be happy to have those discussions with the applicant and find cost-saving solutions to assist with the new application.

New Decision

The business case should generate a recommendation based on best value to the community. Revised proposals must take into consideration the Environmental Impact Assessment (EIA process) and a new Screening Decision would be required.

APPENDIX 1. DEVELOPER IMAGES OF THE GURNELL PROPOSAL

View of the entire development facing north east – Buildings do not harmonise with the surroundings.



View of the development from Ruislip Road East facing East - MOL erosion and substantial impact to openness. Buildings are out of context and character with the surroundings.



View of the development from inside the park facing south west - MOL erosion and substantial impact to openness.



View of the leisure centre from Ruislip Road East - Proposed Leisure Centre is materially larger



View of the development from Ruislip Road East next to Peal Gardens facing West - MOL erosion and substantial impact to openness. Buildings are out of context and character with the surroundings and will cause breaches to sunlight/daylight guidelines for the existing properties.



View of the development from Ruislip Road East facing west



APPENDIX 2. COMPARISON PICTURES

Current



Proposed



Current



Proposed



Current



Proposed



APPENDIX 3. VISUAL IMPACT ASSESSMENT IMAGES

Selection of wireframes from the Visual Impact Assessment. The top image is the unedited version from the assessment and the bottom images has been edited to provide a more meaningful representation of the impact.

Figure 7: Viewpoint 1 Ruislip Road East bus stop: Development Case Photomontage



Figure 7: Viewpoint 1 Ruislip Road East bus stop: Development Case Photomontage



Figure 7: Viewpoint 1 Ruislip Road East bus stop: Development Case Photomontage

Scaled view

When viewed at arms length (approximately 50cm) this A3 sized scaled image provides a realistic representation of the view



Figure 7: Viewpoint 1 Ruislip Road East bus stop: Development Case Photomontage

Scaled view

When viewed at arms length (approximately 50cm) this A3 sized scaled image provides a realistic representation of the view



Figure 9: Viewpoint 2 Ruislip Road East/Avalon Road: Development Case Photomontage



Figure 9: Viewpoint 2 Ruislip Road East/Avalon Road: Development Case Photomontage



Figure 11: Viewpoint 3 Argyle Road/Peal Gardens: Development Case Photomontage



Figure 11: Viewpoint 3 Argyle Road/Peal Gardens: Development Case Photomontage



Figure 11: Viewpoint 3 Argyle Road/Peal Gardens: Development Case Photomontage

Scaled view

When viewed at arms length (approximately 50cm) this A3 sized scaled image provides a realistic representation of the view



Figure 11: Viewpoint 3 Argyle Road/Peal Gardens: Development Case Photomontage

Scaled view

When viewed at arms length (approximately 50cm) this A3 sized scaled image provides a realistic representation of the view



Figure 13: Viewpoint 4 Ealing Golf Club/footpath over River Brent: Development Case Photomontage

Scaled view

When viewed at arms length (approximately 50cm) this A3 sized scaled image provides a realistic representation of the view



Figure 13: Viewpoint 4 Ealing Golf Club/footpath over River Brent: Development Case Photomontage

Scaled view

When viewed at arms length (approximately 50cm) this A3 sized scaled image provides a realistic representation of the view



Figure 15: Viewpoint 5 Argyle Road adjacent to River Brent: Baseline Photograph

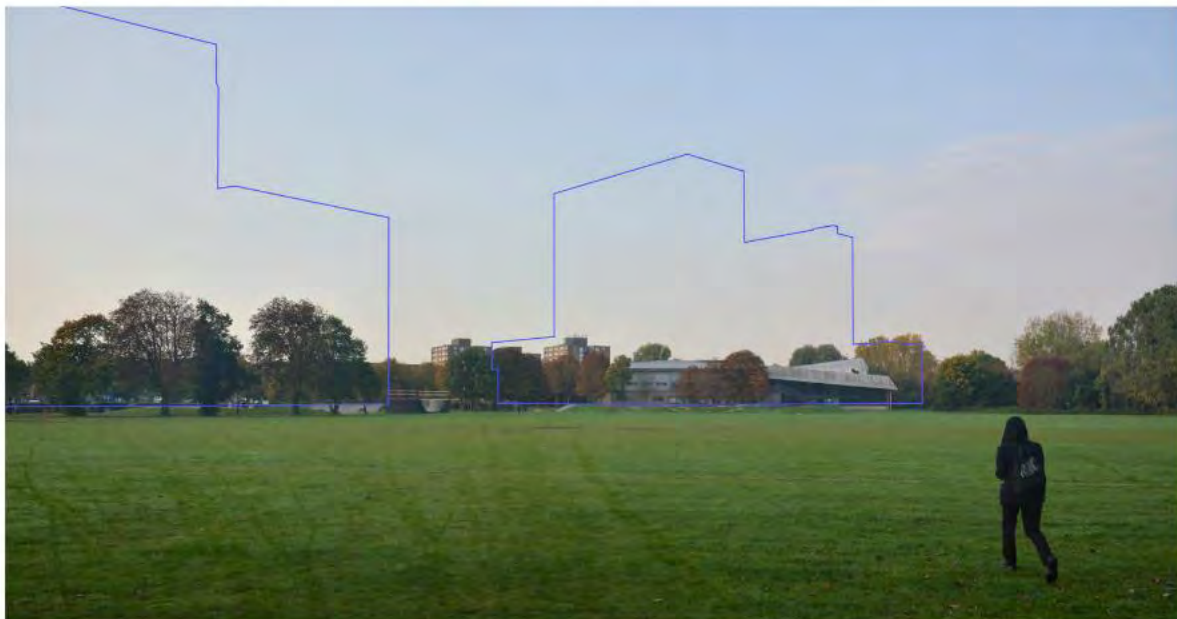


Figure 15: Viewpoint 5 Argyle Road adjacent to River Brent: Baseline Photograph

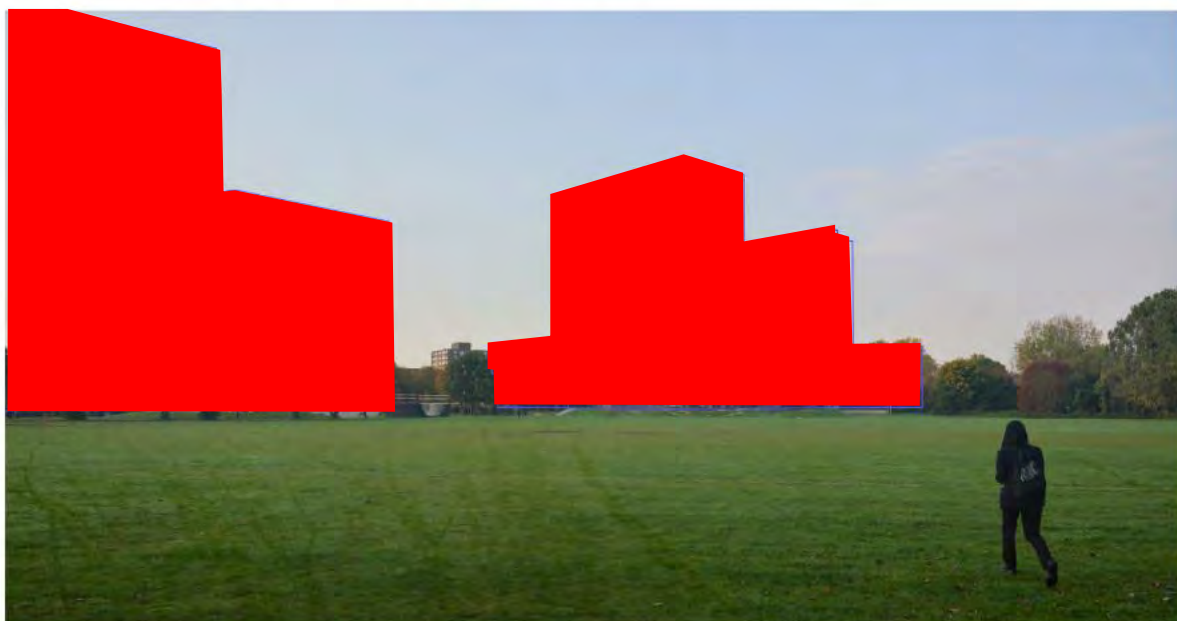


Figure 15: Viewpoint 5 Argyle Road adjacent to River Brent: Baseline Photograph

Scaled view

When viewed at arms length (approximately 50cm) this A3 sized scaled image provides a realistic representation of the view



Figure 15: Viewpoint 5 Argyle Road adjacent to River Brent: Baseline Photograph

Scaled view

When viewed at arms length (approximately 50cm) this A3 sized scaled image provides a realistic representation of the view



Figure 17: Viewpoint 6 Stockdove Way opposite no. 22: Development Case Photomontage

Scaled view

When viewed at arms length (approximately 50cm) this A3 sized scaled image provides a realistic representation of the view

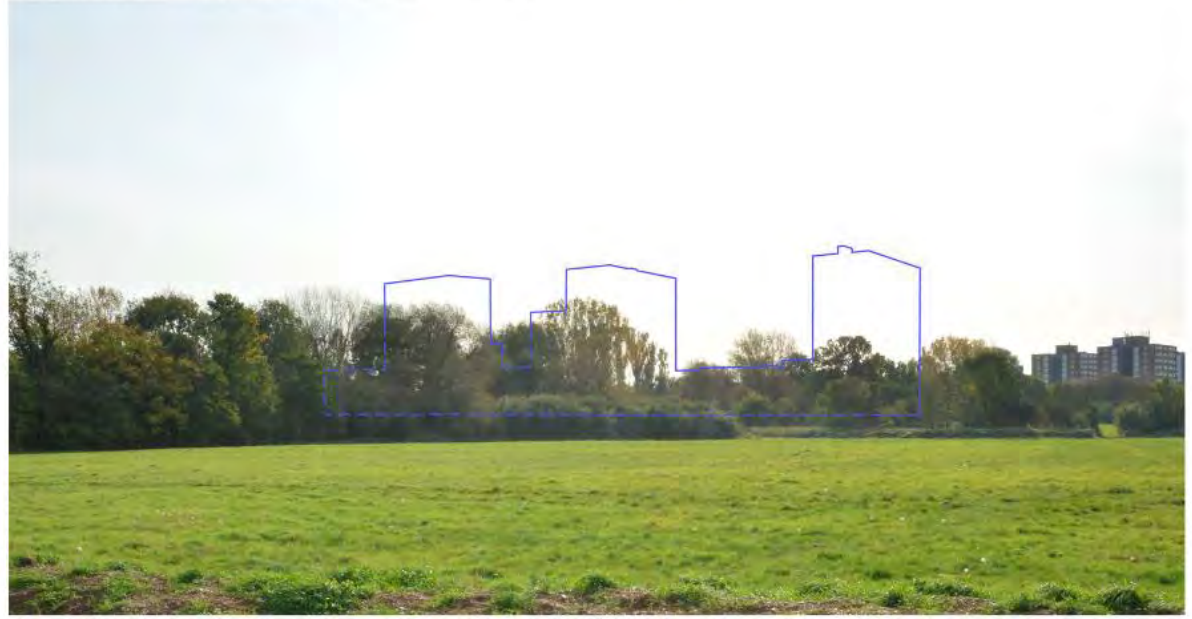


Figure 17: Viewpoint 6 Stockdove Way opposite no. 22: Development Case Photomontage

Scaled view

When viewed at arms length (approximately 50cm) this A3 sized scaled image provides a realistic representation of the view



Figure 21: Viewpoint 8 The Capital Ring, Horsenden Hill: Development Case Wireframe

Scaled view
When viewed at arm's length (approximately 50cm) this A3 sized scaled image provides a realistic representation of the view



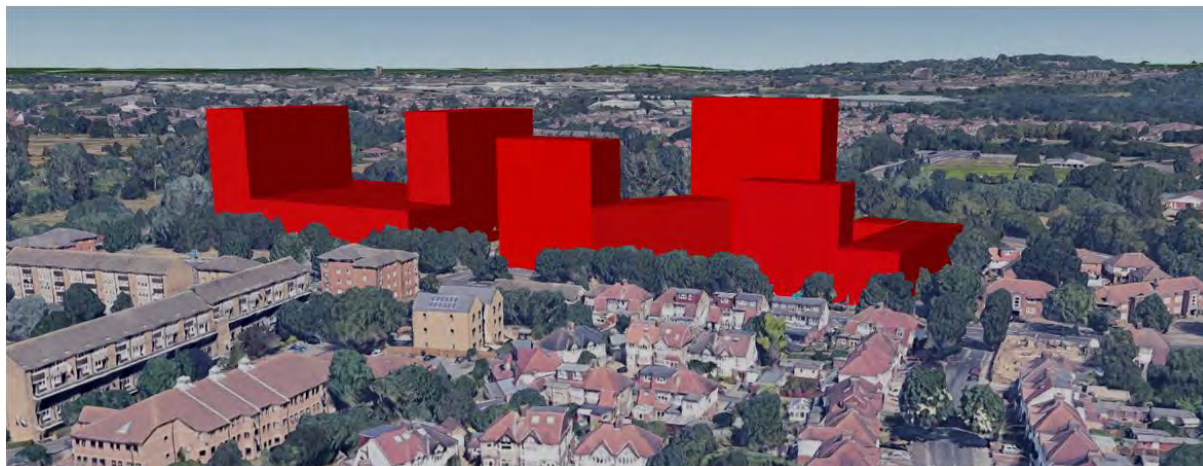
Figure 21: Viewpoint 8 The Capital Ring, Horsenden Hill: Development Case Wireframe

Scaled view
When viewed at arm's length (approximately 50cm) this A3 sized scaled image provides a realistic representation of the view

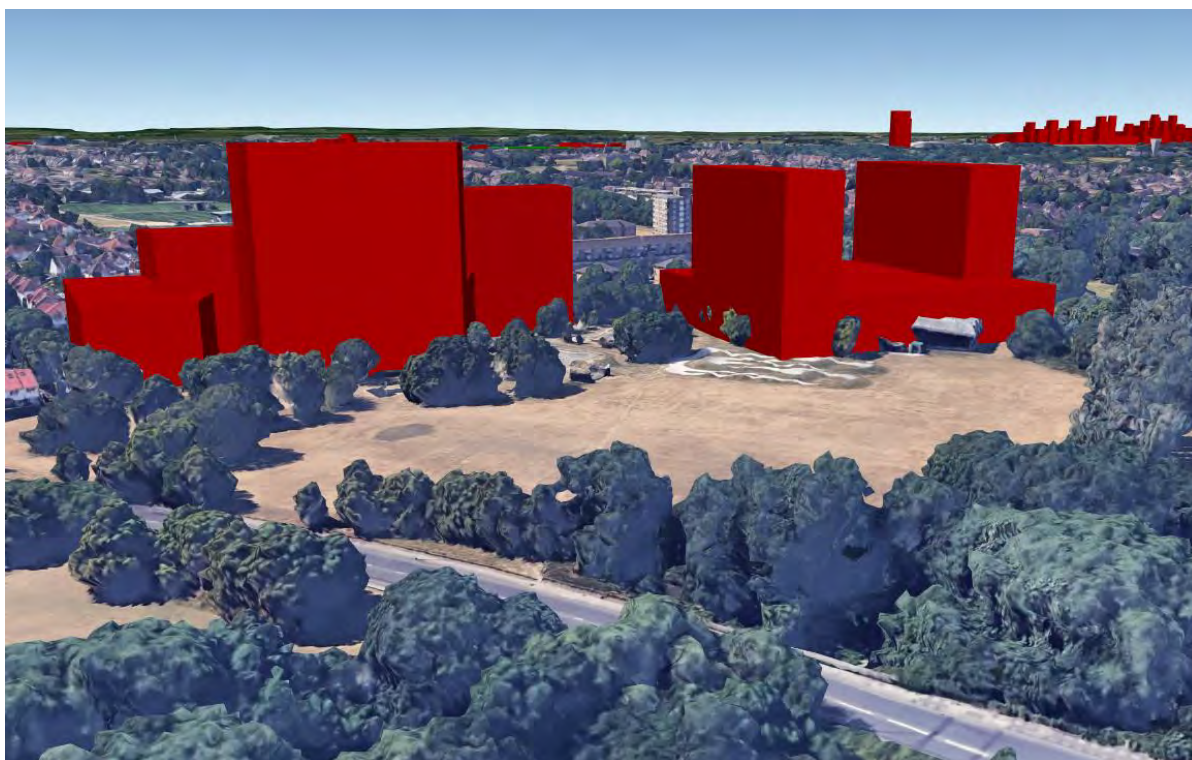


APPENDIX 4. CGI IMAGES OF THE DEVELOPMENT PRODUCED BY SAVE GURNELL

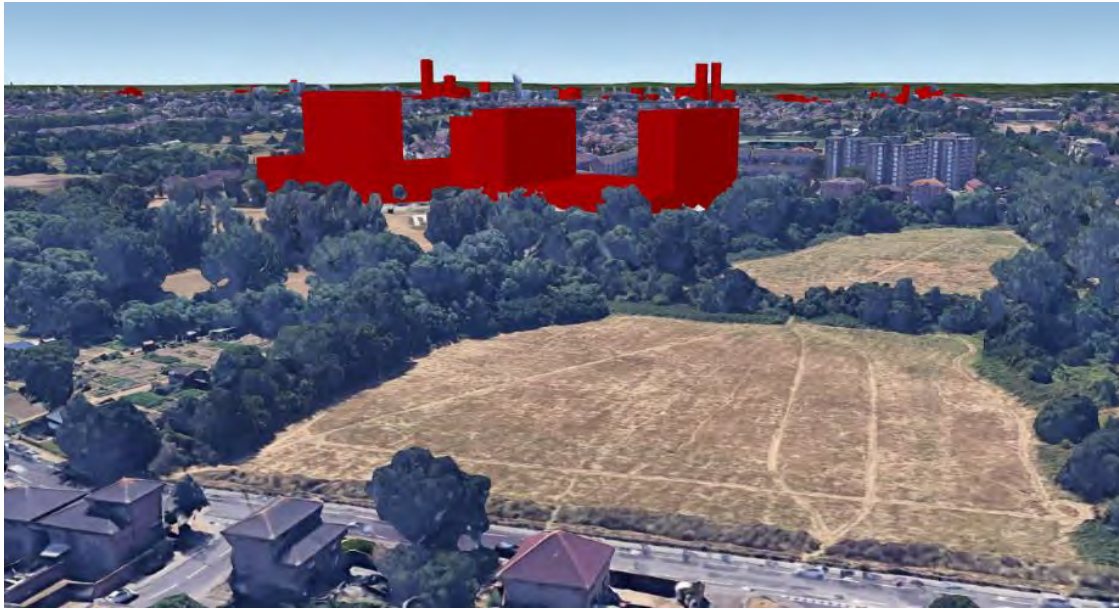
View from above Crossway facing north west.



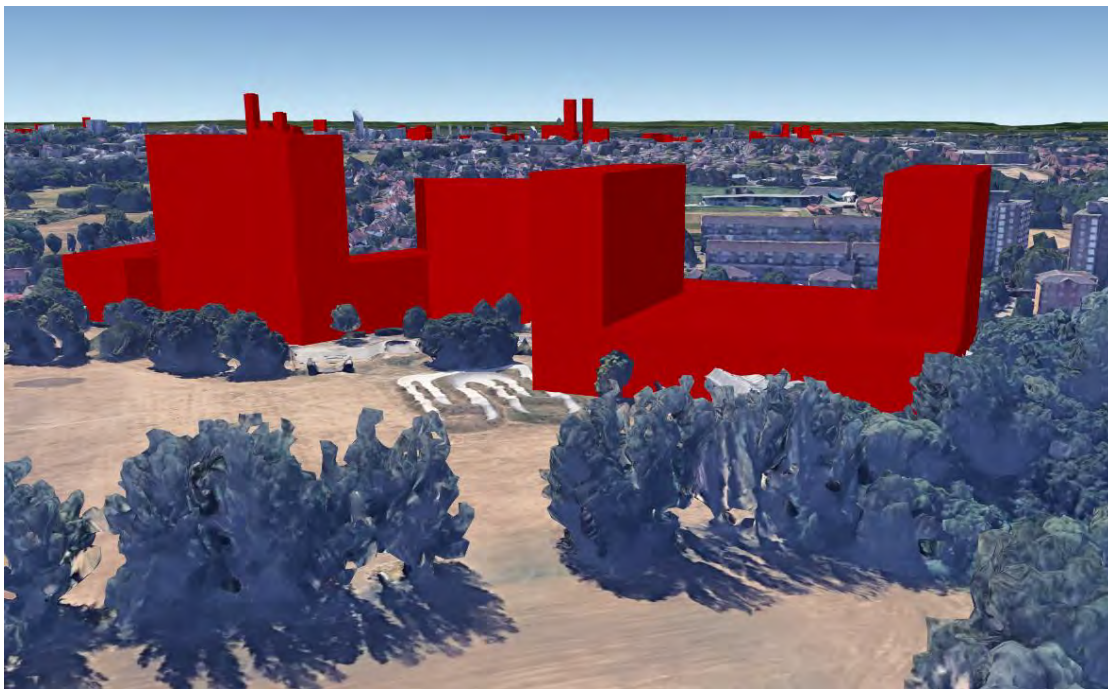
View from Argyle Road facing south west into the park



View from Stockdove Way, overlooking the SINC facing south.



View from inside the park, facing south east.



APPENDIX 5. TALL BUILDING'S POLICIES

London Plan – Policy 7.7 Location and design of tall and large buildings

- 10.1 Gurnell has not been identified for development, let alone as a suitable site for tall buildings. London Plan Policy 7.7 states that “Tall and large buildings should not have an unacceptably harmful impact on their surroundings”. The proposed development will cause an unacceptable impact in terms of harm to both the MOL and other harm as outlined in this document.
- 10.2 No “urban design analysis” has been carried out and there are several issues with the criteria outlined in paragraph C of the policy
- This site does not sit within an area suitable for such an intense development and does not have good access to public transport being PTAL 2-3.
 - The character of the area will be adversely affected by the scale, mass and bulk of the proposed development – it is totally out of context and character with the local area and especially as the site is MOL and undeveloped save for the existing leisure centre. It will not relate well to the form, proportion, composition scale and character of the surrounding buildings.
 - The proposals do not incorporate the highest standards of architecture and materials and there is a significant amount of “dead frontage” in the proposals.
 - The permeability of the site and wider area will be totally eradicated by the proposed development. There will be significant harm to and erosion of MOL.
 - Not only will the “podium garden” not be accessible to the public, it will not even be accessible to the residents of the affordable housing component.
 - This development will make no contribution to local regeneration.
- 10.3 Paragraph D states that “*Tall buildings should not affect their surroundings adversely*” The proposed building will have a significant detrimental effect on their surroundings, they will cause overshadowing to local properties (with a significant number of breaches) and parkland and will impact views and openness on the MOL.
- 10.4 Paragraph E of the policy states that: “*The impact of tall buildings proposed in sensitive locations should be given particular consideration.*” “*the edge of the Green Belt or Metropolitan Open Land,*”. This site has not been identified in the Local Development Framework for development, and certainly not identified as a site for tall buildings.

Draft London Plan – Policy D9 Tall Buildings

- 10.5 Paragraph B states that “Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan”. This site has not been identified for tall buildings in the Development Plan.
- 10.6 The development proposals fail to adequately address the following visual impacts:

- The Visual Impact Assessment is insufficiently to reasonably assess the visual impacts from immediate, mid-range and long-range views.
- The proposed development will have a negative effect to the “*local townscape*” in terms of proportions and materiality
- The adjacent buildings are significantly lower height than the proposed tower blocks and there is no “*transition in scale*” particularly between the tower blocks and the park – in fact the tallest block at 53m is directly next to the park and will cause privacy issues.
- The architectural quality and materials are not of an “exemplary standard”
- Internal light pollution has not been assessed and is likely to be significant given the scale and massing on the buildings and the leisure centre
- It has not been demonstrated that “*the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building*”. The Transport Assessment is flawed and has suggested there are no transport impacts. There is no Travel Plan in place.

10.7 The development proposals fail to adequately address the following environmental impacts:

- The comfort and enjoyment of open spaces will be compromised by the proposed development, particularly due to the overshadowing effect in the park and surrounding properties
- Noise created by air movements around the buildings machinery or the leisure centre has not been properly assessed and may detract from the comfort and enjoyment of open spaces around the building

10.8 Additionally, there are no “Free to enter publicly-accessible areas” in fact the podium roof garden is not even accessible to the residents of the affordable housing, it will be solely accessible to the private market units

Ealing Local Plan – Policy 7.7 Location and design of tall and large buildings

10.9 The policy states that tall and large buildings must

- “*accord with the spatial objectives of the Development Strategy in being located on specified sites*”
- “*offer an outstanding quality of design*”
- “*make positive and appropriate contribution to the local context and the broader area on which they impact*”
- “*Tall buildings have a greater impact on their surroundings and on the borough as a whole than other forms of development and as such they must be held to higher standards than other development which will be less visually prominent*”

10.10 This site is not specified for development let alone tall buildings. The design is unattractive and does not offer an outstanding quality of design. They will make an extremely negative effect on the local context and the local area.

APPENDIX 6. ADDITIONAL PLANNING POLICY ON GREEN AND OPEN SPACES

In addition to non-compliance with MOL planning policy, the proposals do not comply with planning policy on green and open spaces.

London Plan and Draft London Plan policies

The proposals do not comply with the following policies:

- London Plan Policy 7.18 - Protecting open space and addressing deficiency
- Draft London Plan Policy G1 - Green Infrastructure
- Draft London Plan Policy G4 - Open Space

Ealing Development Management Plan (Development Plan Document)

Policy 2.18 - Green Infrastructure: The network of open and green spaces

10.11 Green infrastructure within in Ealing includes but is not limited to: Green Belt, Metropolitan Open Land, Public Open Space, Community Open Space, Green Corridor, Blue Ribbon Network, Sites of Importance for Nature Conservation and Heritage Land. The policy states that:

- *“only development ancillary to the open space will be permitted. The size of development within green and open spaces and its impact upon visual openness must be kept at a minimum”*
- *“Development should not compromise the visual openness or heritage value of open and green spaces particularly with regard to views within and across these areas. The impact of development upon views to and from open and green spaces is also a material consideration”*

10.12 The proposals go completely against this policy. The impact to visual impact will be significant and the view within, across and to and from the MOL will be substantially impacted.

Policy 5.11 Green Roofs and Development sites environs

10.13 The policy states that *“Green Roofs should be provided on major developments that fall within 100m of the following designations”* list as per (9.11). However, there are no green roofs in the development, just a podium garden.

Policy 7D Open Space

10.14 The policy states that *“any development adjacent to or neighbouring existing open space should seek to enhance and not compromise the character of that open space or its function.* Developments over 150 units must have private and communal garden space however the affordable housing units have no access to the podium roof garden.

Policy 5.2 Protect and enhance MOL and Policy 5.4 Protect the natural environment - biodiversity and geodiversity

11. Policy 5.2 states that the Brent River Park and adjacent MOL should have *“sensitive management of this public parkland for amenity, nature conservation use, and as flood plain”* and policy 5.4 seeks to *“to protect and promote the network of Nature Conservation sites in the borough through enhancing the natural value of existing sites.* However, these proposals will destroy an area of SINC and landscape a flood plain.

From: [REDACTED] <[REDACTED]@bartonwillmore.co.uk>
Sent: 28 August 2020 08:45
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Gurnell LC - LSH response to James Brown FVA
Attachments: 200827 Tall Buildings Policy Letter.doc

Please see attached Tall Buildings assessment – apologies for the slight delay in sending and hopefully its still useful.

Please use the architects measurements in terms of PDL etc – this is the correct one and we will work with the landscape architect to bring his into line when he comes back from leave. On point 4, we don't have the elevations yet but I will shortly send you some floor plans of the building.

Thanks

Senior Planner

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**BARTON
WILLMORE**

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From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 25 August 2020 09:08
To: [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@bartonwillmore.co.uk>; [REDACTED] <[REDACTED]@bartonwillmore.co.uk>; [REDACTED] <[REDACTED]@ecoworldinternational.com>
Cc: [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>
Subject: RE: Gurnell LC - LSH response to James Brown FVA

Thanks [REDACTED]

In terms of timescales, I would need this by Thursday evening as the deadline for my report (if it is to go to the Mayor on 7 September) is this Friday. The Mayor's meetings are every Monday afternoon.

The MOL section is completed and based on the figures on the attached plan. This plan is included in the report for illustrative purposes. But I saw something with slightly different figures last week in the Landscape Area schedule, so please can it be confirmed that the attached plan and figures is (or isn't) the agreed position on footprint and PDL. If this does need revising could you update the existing and proposed MOL plan.

A tall buildings assessment summary would be helpful as I'm currently writing this up and finalising on Thursday.

Thanks
[REDACTED]

From: [REDACTED] <[REDACTED]@ealing.gov.uk>
Sent: 24 August 2020 17:41
To: [REDACTED] <[REDACTED]@bartonwillmore.co.uk>; [REDACTED]
<[REDACTED]@bartonwillmore.co.uk>; [REDACTED] <[REDACTED]@ecoworldinternational.com>
Cc: [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED]
<[REDACTED]@ealing.gov.uk>
Subject: Gurnell LC - LSH response to James Brown FVA

[REDACTED]
I attach the LSH Response.

It has also been sent to the GLA for their Stage 1 Report.

Whilst writing, from my update conversation today with [REDACTED] [REDACTED] it is apparent there is additional documentation he (and I will) need to complete his report for 7th as follows, some of which we have already discussed and I know you have well in hand, but I include nevertheless for completeness:

1. Review of ItP Plan Policies, in particular tall buildings policy D9. A comprehensive review of ItP Plan policies should be carried out given the time passed since the application was submitted and the significant weight the SoS is attaching to unaltered policies, of which D9 is one. Can I suggest this be in the form of a Supplementary Planning Statement covering other issues as you see fit, which I will also add to the LB website,
2. Management Plan,
3. FRA (this is for info as the EA response not likely to be available until next week at the earliest),
4. Measured plans and elevations existing and proposed of the LC,
5. Agreed figures on footprint and hard surfaces.

[REDACTED] can confirm, but I think he needs items 1, 4 and 5 this week.

Regards,
[REDACTED]

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This footnote also confirms that this email message has been swept by

VIA EMAIL

■■■■■ ■■■■■
Principle Strategic Planner
Development Management
Greater London Authority
City Hall
London
SE1 2AA

Our ref: 24313/A3/EB
LPA Ref: 201695FUL
27th August 2020

Dear ■■■■■

GURNELL LEISURE CENTRE TALL BUILDINGS POLICY D9 – DRAFT LONDON PLAN

Following on from recent discussions regarding development at the Gurnell Leisure Centre site, we have prepared an assessment against the relevant sections of Tall Buildings Policy D9 of the Intend to Publish Version of the Draft London Plan.

Policy D9 is made up 4 subsections including:

- A) Definition
- B) Locations
- C) Impacts
- D) Public Access

Parts A) and B) relate to the definition of 'Tall Building', and how Borough's should shape local plan policies to assess tall buildings. It is accepted that elements of the proposal are considered 'tall', and an assessment against the Local Plan policies including appropriate locations for tall buildings is contained with the submitted Planning Statement. Thus no further assessment against these points is required.

An assessment against C) Impacts and D) Public Access of the Policy, has been provided below.

Policy D9 – Tall Buildings**Part C) Development proposals should address the following impacts:****1) visual impacts**

a) the views of buildings from different distances:

i long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views

ii mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality

iii immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.

b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding

c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan

Response: As part of the suite of applications documents, a full Townscape and Visual Impact Assessment was included. The assessment is thorough and seeks to identify the key visual and landscape effects that would result from the proposed development. Areas of sensitivity are identified and 8 key view points are studied to determine effects on immediate, mid and long-range views. The TVIA is included in the package of documents forwarded to the GLA as part of the Stage I referral process.

All of the buildings proposed are placed to promote access, visibility to the active uses, high residential quality and good natural surveillance, particularly on park-facing edges. Conventional reinforcement of the built edge is proposed to the south to promote a more street-like sense of place on Ruislip Road East. The proposed buildings generally vary in height and are placed to generate views of sky between them from most viewing locations in the local context, providing relief and visual interest. An aerial view of the proposal design is shown below in Image 1.

In terms of materials, high quality brick facades are proposed throughout, with a different colour of brick used on each building to articulate and visually separate it from the others. All of the windows to the proposed residential buildings are storey height. The façade corner piers are slender for visual lightness. The topmost floor of each building is taller than the other floors to generate a visual termination. These details would make a positive contribution to the local context and produce a high quality of design. It is also noted that the proposed landscaping strategy further enhances the proposed built form. The proposed park landscape treatment continues around and between the proposed buildings, giving each building a high quality setting and encouraging residents and visitors alike to move into and make full use of the newly refreshed outdoor amenity provision. Full details of design development, option testing, materials and finishes are included within the submitted Design and Access Statement. Thus, the proposal is considered to address aspects C)1a – c of Policy D9 of the Draft London Plan.



Image 1: Gurnell Leisure Centre Development Proposal

d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area

e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it

f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river

Response: The Site is not designated as a conservation area and does not contain listed buildings. There are listed buildings within the wider vicinity, including the Church of St Mary The Virgin on Perivale Lane, as well as several conservation areas. A Built Heritage Statement was submitted with the suite of application documents, and confirms the scheme would have no adverse impacts on the significance of the surrounding built heritage assets by virtue of their distance from the Site. In terms of archaeology, whilst the Site is located within a designated Archaeological Priority Area it is considered to have a low archaeological potential. Accordingly, the imposition of the

above planning condition will provide comfort of no residual harm.

Thus, the proposal is considered to address aspects C)1d of Policy D9 of the Draft London Plan. The proposal is not in the setting of a World Heritage Site or near the River Thames. Thus points e) and f) are not applicable here.

g) buildings should not cause adverse reflected glare

h) buildings should be designed to minimise light pollution from internal and external lighting

Response: As noted previously, the primary façade material to the proposed tall buildings is high quality brick which would avoid any adverse glare. Only 30%-35% of the façade is made up of openings – as well as windows this also includes window frames, plant room doors, obscured panels etc. As such, adverse glare off of any glass/reflective material is not anticipated and furthermore, the level of window openings is not so excessive as to lead to unacceptable levels of light pollution from inhabitants.

An External Lighting Strategy has also been submitted in support of the proposal, which addresses light impact from the proposal. The lighting design would be based upon a high performance low energy solution which whilst adhering to the architectural ambience, is also very sensitive to the environment and local ecology. Therefore the products chosen have high performance optics and full cut off downlight only. This eliminates any upward light and contains the light within the boundaries of the zones intended. The proposal is considered to address aspects C)1g - h of Policy D9 of the Draft London Plan.

Policy D9 – Tall Buildings

Part C) Development proposals should address the following impacts:

2) functional impact

a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants

b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process

c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas

Response: The functionality of the site including safety and servicing have been born in mind throughout the entire design process, and have been resolved in close consultation with LBE and the GLA.

In terms of emergency access both inside buildings and around the site, the submitted DAS details identified routes for vehicles and pedestrians. The submitted Fire Strategy also includes details of emergency exits from buildings. Both documents cover residential and non-residential emergency access, and include details of emergency lighting, signage and accessways.

In terms of servicing, again the DAS includes details of servicing access and routes around the site, as well as the submitted Servicing and Delivery Plan. An excerpt of the refuse servicing strategy within the DAS is shown below in Image 2. Entrances and routes for various modes including pedestrian, cyclists, refuse and delivery is clear and delineated throughout. Servicing is as streamlined and as legible as possible for all users/occupants of the site, including delineation

between public (leisure centre) and private servicing areas where necessary. Safety has been paramount in the design, including ensuring no pedestrian routes cross with heavy vehicle reversing zones etc. In terms of impacts to surrounding parkland, the servicing strategy is such that heavy vehicle routes are located at the site frontage, away from recreation and parkland spaces to ensure disturbance is minimised. Refuse and delivery vehicles would be able to enter the site and would not have to stop on-street thereby avoiding traffic and nuisance to the surrounding area. Details of building maintenance have also been included in the DAS. Therefore, the proposal is considered to address aspects C)2a - c of Policy D9 of the Draft London Plan.

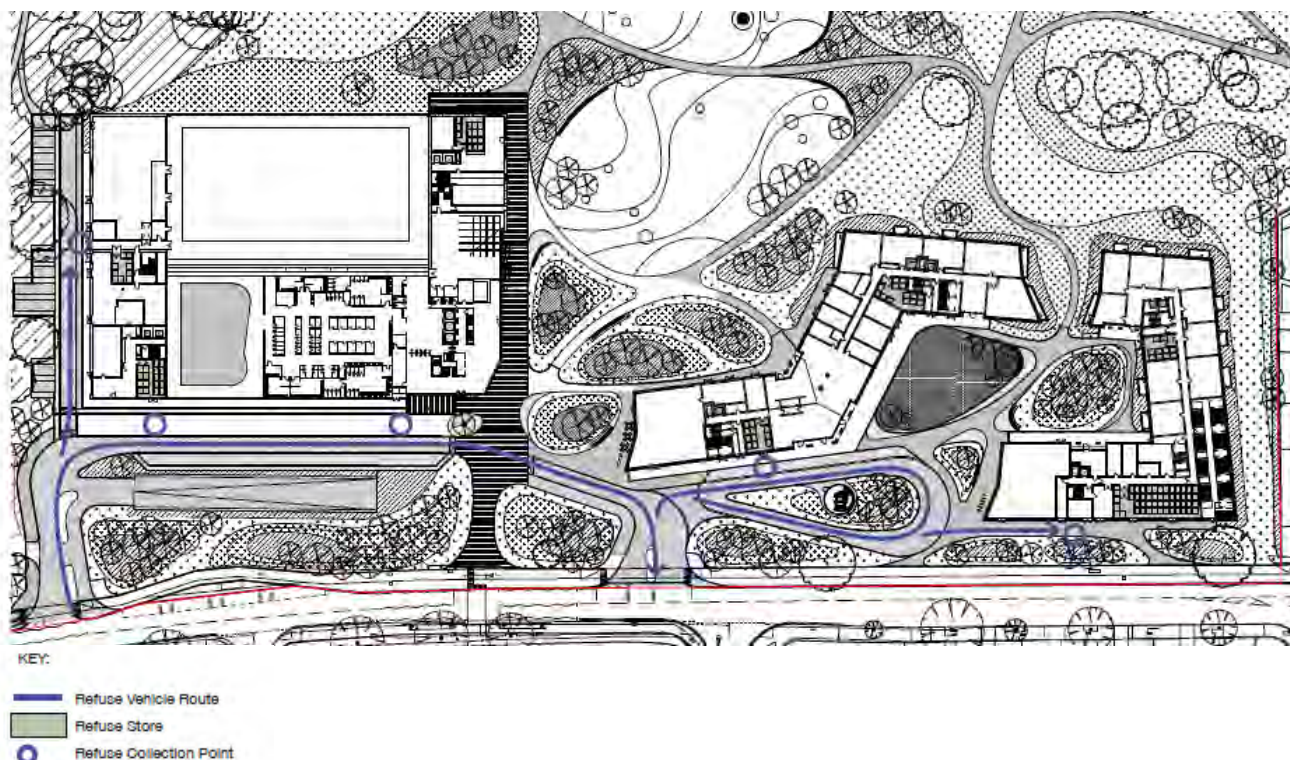


Image 2: Refuse Servicing Strategy Extract

d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building

f) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area

g) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings

Response: The submitted Transport Assessment clearly demonstrates that the local infrastructure surrounding the site has the capacity to accommodate the proposed uplift in local occupancy in the area. In particular, the site has good access to alternative and sustainable transport infrastructure that would allow occupants to move away from car dependency.

The proposal would result in an uplift in new homes in this area, alongside the provision for an improved leisure centre and upgrades to the existing parkland facilities including facilitation of a new footbridge and BMX. Importantly, the new leisure centre would be built to modern standards and would have increased capacity for the local community, which is the key driver for this

proposal. The current centre does not serve its community and is unable to remain operational due to the aged facilities. Thus, the proposal seeks to maximise the benefits it can deliver to the local community, particularly through a new facility and enhanced recreation spaces.

The proposed tall buildings would not interfere with aviation, navigation or telecommunication, nor create significant adverse impacts on any neighbouring solar panels. Therefore, the proposal is considered to address aspects C)2d - f of Policy D9 of the Draft London Plan.

Policy D9 – Tall Buildings

Part C) Development proposals should address the following impacts:

3) environmental impact

- a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building
- b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street level conditions
- c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building

Response: In order to ensure all environmental impacts were considered throughout all stages of the proposal, specialist consultants were engaged from early on in the design process. Reports including a Wind and Microclimate Assessment, Energy Assessment (including overheating and cooling analysis), Air Quality Assessment, Daylight and Sunlight Assessment and a Noise Assessment have been submitted with this application package. These reports all demonstrate that the proposal has appropriate environmental impacts both in terms of within the site (new residents and those using the leisure centre) and to neighbouring and nearby properties and environments (including surrounding MOL). Where mitigation methods have been recommended, these have been incorporated or would be secured via relevant planning conditions on any grant of approval. Thus the proposal is considered to have appropriate environmental impacts such that it would not compromise the comfort and enjoyment of existing and proposed occupants/visitors, nor the surrounding local neighbours and environment. The proposal is considered to address aspects C)3a - c of Policy D9 of the Draft London Plan.

Policy D9 – Tall Buildings

Part C) Development proposals should address the following impacts:

4) cumulative impacts

- a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting Public access

Response: In terms of considering the cumulative effects of the visual, functions and environmental impacts of the proposal as laid out above, the proposal would not result in acceptable impacts on the locality by nature of the proposed height and density. In all circumstances, where mitigating interventions have been recommended by various specialist consultants, the design team have sought to incorporate these into the scheme either via design or through anticipated pre-commencement conditions to any grant of approval.

The submitted TVIA considers the cumulative impacts of the proposed and consented tall buildings on the surrounding landscape, and summarises that the site sits within a built-up area and so a number of other sites are being, or are expected to be, developed in the next few years. Of these,

the regeneration of the estate at Copley Close to the south west of the Site is large enough scale to be considered in terms of a cumulative assessment. However this development is sufficiently separated by the intervening townscape to render their potential impacts distinct from each other. Thus insofar as its cumulative impact, the proposed tall building design is considered to have addressed aspect C)4a of Policy D9 of the Draft London Plan.

Policy D9 – Tall Buildings

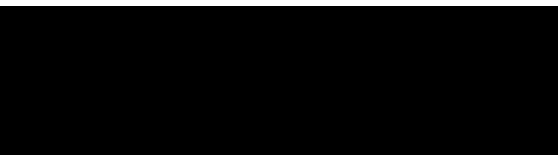
Part D) Public Access

Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.

Response: The proposal does not include any roof decks/viewing platforms. A residential roof garden is proposed, however given that this is to a residential building and is communal amenity to service this, it would not be appropriate to open this up to the public. However, the proposal contains considerable public benefits in the form of a new leisure centre that would greatly improve on the functionality and facilities of the existing Gurnell Leisure Centre; alongside development that would facilitate a new BMX track, upgraded pathways and a new footbridge over the River Brent for anyone enjoying the open spaces areas around the site. The proposal therefore takes aspect D of Policy D9 of the draft London Plan into account.

I trust the above is a useful assessment against policy D9 which will aid in the completion of your Stage I response. We will continue to communicate with the LPA and GLA to provide any further information or clarity as necessary. However, in the meantime if you require any further clarifications please do not hesitate to contact me.

Yours sincerely,


Senior Planner

Tel: 
E:  bartonwillmore.co.uk

#LSHKNOWS VALUATION

FINANCIAL VIABILITY ASSESSMENT REPORT ON

DEVELOPMENT PROPOSALS FOR
GURNELL LEISURE CENTRE
RUISLIP ROAD EAST
EALING W13 0AL

FOR

PLANNING DEPARTMENT
LONDON BOROUGH OF EALING

DATE: 20th AUGUST 2020

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APPENDICES

APPENDIX 1: LETTER OF INSTRUCTION AND LSH TERMS OF ENGAGEMENT

APPENDIX 2: FINANCIAL VIABILITY ASSESSMENT (LSH) – BASE SCENARIO

APPENDIX 3: OTHER FINANCIAL VIABILITY ASSESSMENTS (LSH) – SCENARIOS 1 - 5

APPENDIX 4: PROPOSED SCHEME BUILD COST ANALYSIS (CORE 5)

APPENDIX 5: ECONOMIC AND MACRO PROPERTY MARKET COMMENTARY

20th August 2020

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Perceval House
14/16 Uxbridge Road
Ealing
W5 2HL

Lambert Smith Hampton
United Kingdom House
180 Oxford Street
London
W1D 1NN

For the attention of: [REDACTED]

Our Ref: LWVAL/00150601/JIM/28705

Dear Sirs

OUR CLIENT: PLANNING DEPARTMENT, LONDON BOROUGH OF EALING
PROPERTY: GURNELL LEISURE CENTRE SITE, RUISLIP ROAD EAST, EALING, W13 0AL
PLANNING APPLICANT: BE:HERE EALING LIMITED

1. INTRODUCTION

Purpose of Report

- 1.1 Lambert Smith Hampton ("LSH") is instructed by the Planning Department at the London Borough of Ealing ("LBE") to review the pre-application Financial Viability Assessment ("FVA") for the proposed redevelopment of Gurnell Leisure Centre, Ruislip Road East, W13 0AL.
- 1.2 Financial viability is an important material consideration of planning applications. The cumulative impact of planning policy obligations should not be such to make proposals incapable of being delivered.

"To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable."

- 1.3 The purpose of this report is to assess the financial viability of the proposed development, in line with the Guidance on Viability Assessments set out in the Mayor's Viability Review SPG August 2017, in relation to the affordable housing payment or on-site provision proposed by the applicant. A fundamental consideration underpinning the planning application is the incorporation of 'enabling' or 'facilitating' new residential development; this is proposed to help the Council bridge the funding gap to deliver the new, replacement leisure centre, which is the fundamental purpose of the planning application. The concept of enabling development is well-settled in planning practice and viability assessment.
- 1.4 In summary, the purpose of this Report is to assess whether the developer's Financial Viability Assessment generates no more enabling or facilitating residential development than is necessary to bridge the funding gap.

- 1.5 Given the proposal constitutes inappropriate development on Metropolitan Open Land (MOL), it will be necessary to demonstrate the planning benefits of the scheme are sufficient to overcome the harm to the MOL. You have therefore instructed us to assess the financial viability of the proposal in six defined planning scenarios, which the applicant has modelled, to ascertain that the proposal represents the optimal form of enabling or facilitating development. This will assist the Council in assessing the planning merits of the proposals; the six scenarios are:

Base Case - 'The proposed Scheme without LBE contribution and grant funding' – affordable provision at 34%, excluding £12.5 million Council contribution and any GLA grant.

Scenario 1 – 'The Base Case including the £12.500 million Council contribution towards leisure and £12.544 million GLA grant toward social housing (£9,800,000 + £2,744,000).'

Scenario 2 – 'The quantum of development that would be required to drive a reasonable commercial profit percentage based upon a 50% affordable housing, i.e. the profit level is set at the level expected by a typical developer and the quantum adjusts until this is achieved.' This scenario includes the same funding, contribution and grant assumptions as scenario 1.

Scenario 3 – 'The quantum of development that would be required to drive a reasonable commercial profit percentage based upon a no affordable housing, i.e. the profit level is set at the level expected by a typical developer and the quantum adjusts, when involving council land.'

Scenario 4 – 'The quantum of development that would be required based on the same profit sum (approx) as per Sensitivity Scenario 1 but with 50% affordable housing i.e. the profit level remains constant and the quantum of homes adjusts.' This scenario includes the same funding, contribution and grant assumptions as scenario 1.

Scenario 5 - The quantum of development that would be required based on the same profit sum (approx) as per Sensitivity Scenario 1 but with no affordable housing, i.e. the profit level remains constant and the quantum of homes adjusts.' This scenario includes the £12.5 million Council contribution (but no GLA grant).

Planning Policy Context

- 1.6 The property lies within an area administered by the London Borough of Ealing, whose Local Plan provides the framework for guiding, controlling and facilitating development. The existing Local Plan for Ealing currently comprises the following documents:
- London Plan
 - Development (or Core Strategy) DPD (2012)
 - Development Sites DPD (2013)
 - Development Management DPD (2013)
 - Joint West London Waste Plan (2015)
- 1.7 Below we summarise the key policies which apply to the development proposal as outlined in the Local Plan. However, we understand that the applicant has described these relevant policies, along with a number of other relevant policies, in their pre-application submission documents, such as the planning statement and the intention to adopt the Local Plan.

Metropolitan Open Land

- 1.8 The most significant constraint the site faces is that it is located on Metropolitan Open Land (“MOL”). As laid out in Policy 7.17 of the London Plan “the strongest protection should be given to London’s Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt”.
- 1.9 It is accepted that the development, in its current form, would harm the MOL designation and constitute inappropriate development. This is further reflected in Policy 5.2 of LBE’s Core Strategy which seeks to protect and enhance MOL. However the applicant, in consultation with LBE, believes it has a case for creating a development which meets the criteria of ‘very special circumstances’, by the incorporation of facilitating residential development. This argument predominantly focuses on the need to replace a key community asset (also with regional importance), whilst at the same time providing economic, social and health benefits, as well as housing in the borough.

Affordable Housing

- 1.10 As set out in the London Plan, the Mayor will seek to maximise the provision of affordable housing, with a London wide target of 50% placing particular importance on increasing the provision of affordable family housing. However policies 3.12 and 3.13 do incorporate an element of negotiation in this target, in favour of securing the maximum ‘reasonable’ amount of affordable housing on mixed-use schemes, taking into account development viability, public subsidies and phased development.
- 1.11 Policy 1.2a of the Core Strategy and Policy 3a of the DMDP, which form part of the LBE Local Plan, state that affordable housing will be sought on all developments capable of providing 10 or more residential units. This will be negotiated on the basis of a 50% provision at a 60/40 split of social or affordable rented accommodation to intermediate provision, subject to the individual circumstances of each case.

Leisure Centre

- 1.12 As stated in Policy 5.6 of LBE Core Strategy, the Gurnell site forms part of a wider ‘Sports Hub’, with the leisure centre itself bounded to the north by a substantial area of parkland that includes an existing BMX track, a skate park, a children’s playground and grassed sports pitches. Furthermore, Policy 6.2 of the Core Strategy states that LBE’s own assets and land can be used to stimulate development and provide much of the land for local infrastructure. These assets can have added value if they also provide accommodation for other local service providers, e.g. health, sports and leisure facilities etc.
- 1.13 Additionally, the Ealing Sports Facility Strategy 2012-21 identifies the redevelopment of Gurnell Leisure Centre as being of key importance to the provision of water space in Ealing, addressing both existing latent demand and potential future demand for access to pool space for participation in Ealing.

Information Relied Upon

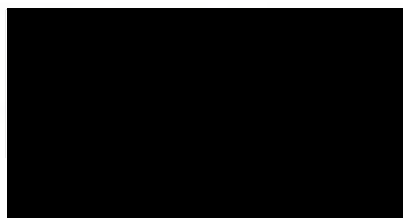
- 1.14 In preparing this report LSH have relied upon information and assumptions provided by the applicant’s wider professional team that are providing support to the project. In particular, supporting the planning application is a Financial Viability Assessment (“FVA”) which has been prepared by James R Brown and Company Ltd, dated April 2020. We understand that this FVA has been produced following initial planning discussions which have taken place between the developer, L B Ealing and the GLA.

- 1.15 Our assessment of the site has taken the information set out in the James R Brown report and sought to benchmark this against commercial norms which are observed in the wider market in order to independently confirm this position to LBE Planning Department.

Confidentiality

- 1.16 Due to the commercially sensitive nature of some of the information contained herein, this report is provided on a strictly private and confidential basis; publication of this document may prejudice the applicant in commercial negotiations. This report must not be recited or referred to in any document, or copied or made available (in whole or in part) to any other person without our express prior written consent.
- 1.17 The advice provided herein must only be regarded as an indication of potential value, on the basis that all assumptions are satisfied. The advice does not and cannot be considered to represent a formal valuation in accordance with either the Royal Institution of Chartered Surveyors (RICS) Valuation – Global Standards 2020 or the UK supplement (“the Red Book”) and should not be regarded as such.
- 1.18 The report does provide the Planning Department of LBE with an independent assessment of the FVA in order for the Planning Department to satisfy itself that the development proposal provides the optimal financial terms which might be available to LBE within the confines of its adopted planning policy.

Yours faithfully



  
Director, for and on behalf of
LAMBERT SMITH HAMPTON

2. METHODOLOGY

Financial Viability in Planning

- 2.1 As per the NPPF and PPG¹ on viability, where up-to-date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable. It is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage.
- 2.2 The PPG, which was updated in May 2019, sets out the government's recommended approach to viability assessment for planning. The approach supports accountability for communities by enabling them to understand the key inputs to and outcomes of viability assessment. This followed the earlier decision in *Parkhurst Road Ltd v Secretary of State for Communities and Local Government & Anor* [2018] EWHC 991.
- 2.3 Following these updates, the RICS has published a Professional Statement, effective from September 2019 entitled '*Financial viability in planning: conduct and reporting*' which aims to provide consistency regarding the application of policy and guidance and assist the practitioner in individual cases.
- 2.4 The Mayor of London has also published supplementary planning guidance on Affordable Housing and Viability, which aims to make planning clearer, quicker and more consistent.
- 2.5 The Mayor's Viability Review SPG August 2017 sets out the threshold approach to affordable housing:

The Fast track route: "Applications that meet or exceed 35 per cent affordable housing provision without public subsidy, provide affordable housing on-site, meet the specified tenure mix and meet other planning requirements and obligations to the satisfaction of the LPA and the Mayor where relevant, are not required to submit viability information. Such schemes will be subject to an early viability review, but this is only triggered if an agreed level of progress is not made within two years of planning permission being granted (or a timeframe agreed by the LPA and set out within the S106 agreement)."

The Viability tested route: "Schemes which do not meet the 35 per cent affordable housing threshold, or require public subsidy to do so, will be required to submit detailed viability information which will be scrutinised by the Local Planning Authority (LPA), and where relevant the Mayor, and treated transparently. Where a LPA or the Mayor determines that a greater level of affordable housing could viably be supported, a higher level of affordable housing will be required which may exceed the 35 per cent threshold. In addition, early and late viability reviews will be applied to all schemes."

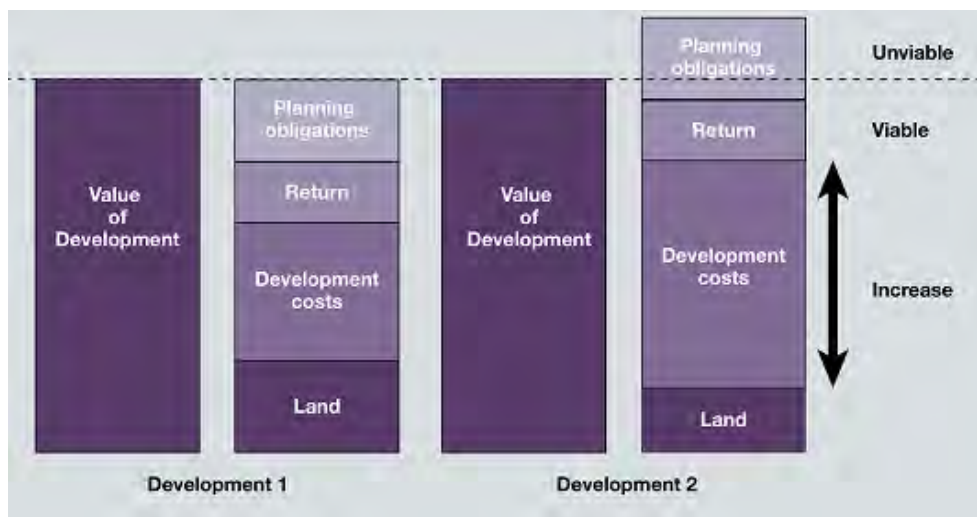
- 2.6 The applicant contests that the only scheme which produces even close to a 'commercially accepted' profit contains no affordable housing. The applicant has provided an FVA, based on (an industry standard) "Argus Developer" model, which is a form that is also acceptable to LBE. Both hard copy and live versions of these appraisals have been provided to us by the applicant for independent analysis. LSH has used the same software in our independent assessment of the scenarios.

¹ National Planning Policy Framework; Planning Practice Guidance

- 2.7 The Mayor advocates the use of the “residual land value” methodology to determine the underlying land value. This assesses the likely gross development value (“GDV”) of the proposed scheme and deducts all of the costs of the development, including “hard costs” (such as the cost of erecting the buildings), the “softer” costs (such as professional fees and financing costs and makes an appropriate allowance for a normal developer’s profit. This methodology has been used by the applicant in its FVA and by us in our independent assessment. We have not contrasted this against a direct comparable or other method, as this would not take account of the particular planning circumstances and design criteria of the proposed scheme.

Viability Testing

- 2.9 There are two approaches that can be used to assess the site specific viability of a development proposal;
- Residual Land Value approach (including an allowance for developer’s return as a cost of development);
 - Developer’s Return approach (where site value is a cost of development).
- 2.10 The Residual Land Value approach (“RLV”) of the proposed scheme, assumes a market level of developer return (or profit) as a “cost” of development, and the RLV is compared to an appropriate Benchmark Land Value (“BLV”).
- 2.11 The Developer’s Return approach uses various inputs to arrive at a Gross Development Value (“GDV”), from which total development costs are deducted; these can include a site value as a fixed figure, resulting in the developer’s residual profit (or return) becoming the output. This is then considered against a benchmark to assess viability. For this, the cost implications of any planning obligations must not be set at a level at which the developer’s return falls below the level which is acceptable in the market (reflecting the risk inherent in undertaking the development).
- 2.12 For a given scheme, if the cost implications of the obligations erode a developer’s return below an acceptable market level, the extent of these obligations will be deemed to make a development unviable; the developer would not proceed on that basis (see figure below).



Source: RICS Financial Viability in Planning GN 94/2012

- 2.13 The benchmark return, which is reflected in a developer’s profit allowance, should be at a level reflective of the market at the time of the assessment being undertaken. It includes the risks inherent in the specific scheme, including those both property specific and those related to the wider market.

- 2.14 In arriving at a Site Value the relevant value should also be in accordance with the definition of viability for planning purposes, which is defined as follows:

Site Value should equate to the market value subject to the following assumption; that the value has regard to development plan policies and all other material planning considerations and disregards that which is contrary to the development plan."

- 2.15 Furthermore, regard should be given to prospective planning obligations. The purpose of the viability appraisal is to assess the extent of these obligations while also having regard to the prevailing property market. As part of this review LBE also needs to verify that the overall quantum of residential development is no more than is necessary to secure the delivery of the replacement leisure centre and also to optimise the quantum of affordable housing secured through the development.
- 2.16 It is important that the type of facilitating development (housing type and tenure mix) represents the optimum solution for the site, both limiting the quantum of inappropriate development on MOL, whilst maximising the genuinely affordable offer. In this context an 'optimum' development is one which strikes the requisite balance between minimising the volume of inappropriate development on MOL whilst maximising the affordable component.
- 2.17 Both the FVA and this review have effectively undertaken sensitivity testing of a range of scenarios. Such scenarios will assist in understanding the degree to which such parameters (namely tenure/typology) influence volume of development needed.

Financial Viability Assessments

- 2.18 An FVA allows a robust testing of the ability of a development project to meet its costs, including the costs of planning obligations, while ensuring an appropriate site value for the landowner is achieved and a market risk-adjusted return to the developer is produced in delivering that project. FVAs should be sufficiently detailed with evidence supporting the key inputs into the study.
- 2.19 Instances may arise where the project programme of a proposed scheme is such that the costs and values associated with that scheme may span the usually anticipated development cycle and so may warrant the inclusion of projected cost and value assumptions, with an associated assessment of an appropriate land-owner or developer return on this basis.
- 2.20 The developer's consultants, James R Brown has sought to assess the proposed scheme on a present-day only basis. We believe this is an appropriate approach to take, particularly for comparison of different scenarios, and have assessed the proposal on this basis as well.
- 2.21 Each of the six identified scenarios has been assessed by taking the Market Value of that scenario on completion (its GDV) and then deducting all of the costs of development incurred, including an allowance for an appropriate developer's profit to reflect risk, to arrive at the underlying Residual Land Value ("RLV"). In some instances, owing to the proposals on this site, this has derived a negative land value (as shown below), rendering an approach unfeasible on a commercial basis. In these scenarios, we have set the Land Value to zero and worked towards stating a residual profit, to benchmark this against a risk adjusted market return.

3. PROPOSED SCHEME

Site Description

- 3.1 The subject property is located in Greenford within the LBE. Gurnell Leisure Centre lies on the north side of Ruislip Road East, bounded by Perivale Park to the west, South Greenford station to the north and Pitshanger Park to the east. The south side of Ruislip Road East is characterised predominantly by residential use, but is also the home of Ealing Trailfinders' Rugby Club and London Broncos RLFC. Brentside High School is also located on the south side of Ruislip Road East, along with some commercial and other community uses.
- 3.2 The existing property comprises a two storey leisure centre, which opened in 1981, providing facilities to the local community such as a 50m swimming pool, recreation pool for children, exercise studios, gym, changing rooms, staff facilities and a small retail unit. The Council has examined carefully the long-term future of this asset including in light of improving other Sporting and Health objectives in the area; given the age and condition of the building, it is now no longer fit for purpose and requires a substantial amount of investment, either through a comprehensive refurbishment of the existing building or through demolition and rebuild. Accordingly, LBE's Cabinet decided in 2015 that the optimum route was to demolish the existing building and replace it with a new state-of-the-art facility.
- 3.3 Despite LBE's desire to see a new facility built, it is only able to contribute £12.5million, which is significantly below the cost of providing a replacement facility. Therefore, as part of the Cabinet resolution, it was decided that the only way that LBE can generate the level of funding required, is through allowing a redevelopment of part of the site for private residential use. Hence the subject application has been submitted by a newly formed joint venture between Eco World London and Be Here Ealing Limited ("BHEL"), for a mixed use scheme of up to 599 residential units. BHEL are listed as the applicants.
- 3.4 The new leisure centre will be built in accordance with the design brief produce by LBE, which includes a larger facility than the existing, to meet growing demand, consistent with the sports 'hub' status of Gurnell set out in the Council's published Planning, sporting and Leisure policy objectives. This new flagship facility will include two swimming pools, spectator seating, wet and dry changing facilities, a health suite, café, children's play area, back offices, a modern 100+ station gym, studios and associated plant space.

Development Proposal

- 3.5 The proposed development comprises a new leisure centre, together with six residential blocks set out surrounding. Blocks A and B are to be set above the new leisure centre, with C, D, E and F set to the east. In total the development will provide 599 residential units, of which 98 are London Affordable Rent (Block A), 98 are Shared Ownership (Block B) and 403 are Private (Blocks C to F).

3.6 The development will offer the following floor area:-

Block	Area Sq m (Gross)	Area Sq m (Net)	Area sq ft (Net)
Block A Residential (London Affordable Rent)	8,870	6,580	70,826
Block B Residential (Shared Ownership)	7,711	5,631	60,612
Blocks C & D Residential (Private)	21,271	15,999	172,212
Blocks E & F Residential (Private)	11,592	8,575	92,300
Commercial	480	480	5,167
Basement & Other	12,400	12,400	133,472
Leisure Centre	7,896	7,896	84,992
Total	70,220	57,561	619,581

- 3.7 The development will also include 160 car parking spaces in the basement with eight surface spaces for the residents, offering one space per 3.8 flats. This includes provision for disabled users. There will be a further 175 car parking spaces for the leisure centre.
- 3.8 The base scheme above represents 35% affordable housing (on a habitable room basis), although the applicant has produced a number of alternative scenarios to examine scheme optimisation. As part of this Financial Viability Appraisal, we have been asked to comment on these scenarios, which are outlined in the first section of this report.

4. SITE BENCHMARK

- 4.1 The applicant asserts in their FVA, produced by James R Brown, that the existing leisure centre does not generate a positive cashflow. Therefore, they have assumed a reasonable Existing Use Value (“EUV”) is £nil and that a reasonable Benchmark Land Value is therefore also £nil.
- 4.2 We acknowledge that the current leisure centre is operating at a loss and nearing the end of its life. In order to rectify this, the centre needs either extensive refurbishment or comprehensive redevelopment. However, even if a new facility is delivered (through any procurement method), we understand it will still be run by LBE for the benefit of its residents on a not-for-profit basis. Given such a facility derives its financial value from its operations, if the centre makes no profit then it has no value.
- 4.3 Therefore, it appears appropriate to accept the applicant’s assumption of a £nil benchmark value.

Benchmark Financial Assumptions

- 4.4 The assessments assume that the freehold interest in the Site is held by LBE and it is free from any onerous easements or restrictions.
- 4.5 We understand that to facilitate the development, an agreement exists between the applicant (BHEL) and LBE whereupon the main terms (subject to planning) are:
- BHEL are acting as planning applicant and developer;
 - The existing leisure centre is to be demolished;
 - The freehold ownership of the new leisure centre is to be retained by LBE;
 - BHEL will be permitted to develop and speculatively sell the private units, which will be owned on a 250 year long leasehold basis;
 - Affordable housing element is to be bought by LBE;
 - Basement costs are to be apportioned between LBE and BHEL;
 - The developer to provide, or contribute towards, the provision and/ or maintenance of planning obligations arising from the development.

5. PROPOSED SCHEME – FINANCIAL VIABILITY ANALYSIS

Base Appraisal

- 5.1 We have started by looking at the “base appraisal”, which is the assumption adopted by James R Brown in the FVA prepared on behalf of the developers.
- 5.2 This is set out as Base Case – ‘The proposed Scheme without LBE contribution and grant funding – affordable provision at 34%, excluding the £12,500,000 Council contribution and the £12,544,000 GLA grant.’

Development Timetable

- 5.3 The applicant proposed a total development timetable of 85 months, set out on the following basis (with our own analysis adjacent).

Issue	Applicant's Proposal	LSH Analysis
Purchase:	2 months	3 months
Pre-Construction:	8 months	9 months
Construction:	51 months	54 months
Letting:	0 months	6 months*
Sales:	24 months	27 months
Total	84 months	76 months

- 5.4 The applicant's submitted FVA assumes the letting period (stated at 0 months) is within the construction period, with no specific further allowance. We adopt a similar model, although have stipulated the amount separately to explicitly illustrate its need. However in our model this overlaps with the construction period and does not add to the overall delivery period.
- 5.5 The Submitted FVA suggests a total time frame of 84 months, however in their analysis they have an additional 10 months at the end, which appears unattached to the project. This should therefore be restated at 76 months.
- 5.6 The site purchase allows the time from hypothetically agreeing acquisition of the site to the payment, although with the site having a nominal value, this lead in period is immaterial. The pre-construction period allows negotiations to achieve a detailed planning consent, and appoint contractors.
- 5.7 The applicants have taken the construction period to the last 51 months. The construction has been phased between the various blocks, which exists both in terms of cash flow and build costs (sequential delivery and hence costs) and also in timing of private sales, when the market would not be “swamped” by an over-delivery of units.

Gross Development Value (“GDV”)

- 5.8 In their base appraisal, the applicant's advisor James R Brown adopted the following end values to arrive at their opinion of GDV in their FVA (extract from appendix 4 the report of March 2020):

Residential Block	Ownership	NIA Sq m	NIA Sq ft	Rate per sq ft	GDV (£millions)
Block A	London Affordable Rent	6,580	70,826	£271.89	£19.26
Block B	Shared Ownership	5,631	60,612	£510.63	£30.95
Block C & D	Private Residential	15,999	172,212	£667.81	£115.00
Block E & F	Private Residential	8,575	92,300	£667.81	£61.64
Car Parking	Private	-	-	-	£2.20
TOTAL		36,785	395,950	£578.48	£229.05

Commercial	Use	NIA Sq m	NIA Sq ft	Rent per sq ft & Yield	GDV (£millions)
Block A	Commercial (retail)	480	5,167	£14.00 @ 6.50%	£0.97
TOTAL		37,199	400,406	£537.60	£230.02

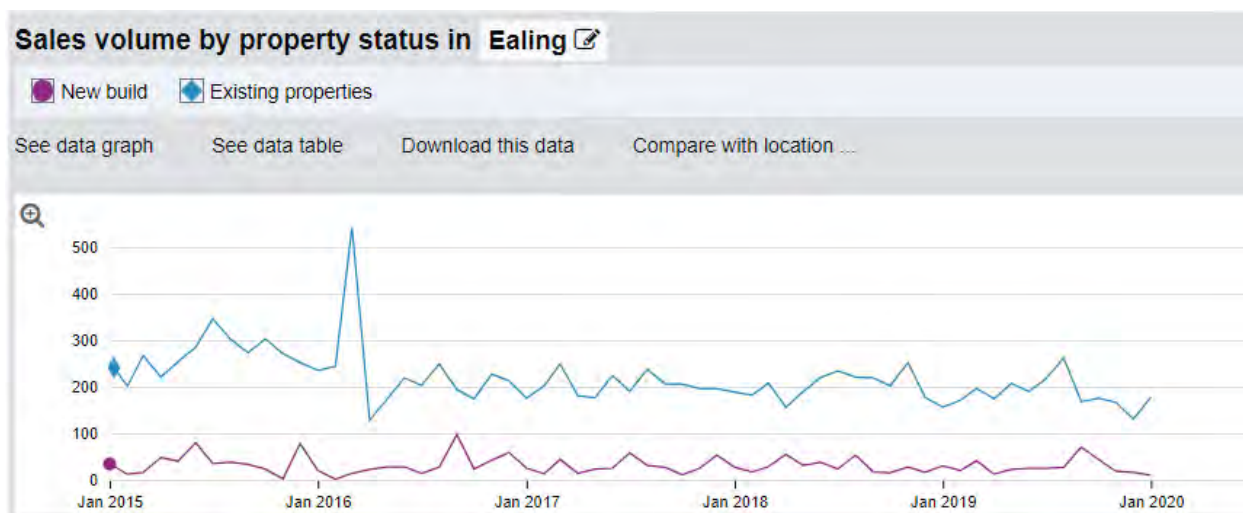
- 5.9 Based on the above, the applicant has arrived at a total GDV of £230.02 million, which is also the net realisation as no purchaser's costs have been deducted for the sale of any freehold.

Ground Rents

- 5.10 The proposed tenure structure of the building has yet to be clarified, although with a development such as this one would anticipate the shared ownership and affordable housing being sold on for peppercorn rents, together with the leisure centre on a similar arrangement. The private flats would normally be sold on long ground leases at a ground rent, with service charge provisions.
- 5.11 The applicant's FVA makes no provision for any ground rent income receivable, nor the capital value this might add. By way of example, if the 403 private apartments were sold on ground rents at, say, £250 per annum, this would add £100,750 per annum to the rent and could create an additional £2.4 - £2.6 million to the capital value.
- 5.12 Owing to the ongoing Government consultation with regard to the fairness and appropriateness of ground rents charged at a fixed or rising incomes, many are anticipating legislation to reduce ground rent income to zero (peppercorn). Hence valuers and appraisers are tending to ignore any such additional income in assessing the viability of schemes. In line with current market practice, we have also ignored any such potential, however you should be aware that if the legislation remains unchanged, this may be an avenue to create additional value for the developers.

Residential Market Commentary

- 5.13 According to the Land Registry, there were 2,750 residential property transactions in the London Borough of Ealing between January 2019 and January 2020 (most recent available figures with Covid 19). Of these, 13% (360) were new build properties, with the remainder (2,390) being existing stock. As can be seen from the graph below, new build sales month on month since January 2015 have remained relatively stable, averaging 30 new build sales per month. For context, over the same period, neighbouring boroughs Brent and Hounslow, averaged 42 and 35 per month respectively.



Source – HMLR; August 2020

- 5.14 With respect to comparable evidence, there has been limited new residential development in this area and as such, robust evidence of comparable values for new build units within close proximity to the subject property are hard to come by. Therefore, the search area needs to be widened to arrive at comparable evidence which, as shown below, produces some variance dependent on a number of factors.
- 5.15 In the James R Brown report, evidence of comparable sales is cited which we have noted as follows:
- 5.16 **Copley Close W7** – this comprised an LBE development, which appeared broadly comparable to Gurnell, however, most sales here occurred in 2017, leading the example dated.
- 5.17 **St Bernard's Gate, UB1** – this development is arguably in a slightly better location. James R Brown cites some completion evidence, although notes that exchanges may have taken place prior, during the development process. There are also a series of flats currently on the market. Based largely on an analysis of these two schemes, James R Brown has priced the units depending on positioning, positioning within the building and configuration and has set out individual unit values in a schedule in Appendix 2 to his report. This shows a total realisation of £176,643,000 and an average sale price of £667.81 per sq ft.
- 5.18 As well as these, there are a number of other developments, which we consider relevant and worthy of consideration:

The Hoover Building, Western Avenue, Perivale, UB6 8DW

- 5.19 This development by IDM Properties consists of 66 units (studio, one, two and three bedrooms) within the former Hoover Building, a Grade II Art Deco former factory built in the 1930s for The Hoover Company. All units are fit to a reasonable specification in keeping with the Art Deco exterior. This developments lies on the north side of Western Avenue, in close proximity to Perivale Underground Station, approximately 1 mile north east of the subject property with sales taking place as follows.

Plot ref	Floor	Bed	Sq Ft	Price	£PSF	Date
26	1	2	995	£550,000	£553	Sep-18
13	G	2	811	£515,000	£635	Mar-18
15	1	2	931	£595,000	£639	Mar-18
19	1	2	862	£569,995	£661	Mar-18

Plot ref	Floor	Bed	Sq Ft	Price	£PSF	Date
20	1	2	856	£569,000	£665	Mar-18
24	1	2	938	£575,000	£634	Sep-18
34	1	2	1004	£615,000	£613	Mar-18
35	1	2	825	£525,000	£636	Mar-18
38	3	2	855	£579,995	£678	Mar-18
44	3	2	834	£575,000	£689	Mar-18
46	2	2	745	£525,000	£705	Mar-18
49	3	2	943	£595,000	£631	Mar-18
52	3	2	931	£609,995	£655	Mar-18
53	3	2	938	£619,995	£661	Mar-18
58	3	2	868	£579,995	£668	Mar-18
59	3	2	932	£609,995	£655	Mar-18
62	3	2	930	£595,000	£640	Mar-18
66	2	2	947	£525,000	£554	Mar-18
26	2	1	995	£550,000	£553	Aug-18
54	2	1	434	£325,000	£749	Sep-19
Average			879	£560,199	£644	

Research House, Fraser Road, Perivale, Greenford, UB6 7AQ

- 5.20 Research House is a three storey former office building which has been converted into residential use, comprising 51 apartments. All units are fitted to an average specification, with oak flooring, wool carpets, porcelain tiles and white gloss Hacker kitchens with integrated kitchen appliances. This development is in an inferior location, in an area characterised by predominantly commercial use, approximately 1 mile north east of Perivale Underground Station and 1.5 miles north east of the subject property. Being a converted former office building, transactional levels would be anticipated to be at a discount to bespoke built apartments, with sales including the following.

Plot ref	Floor	Bed	Sq Ft	Price	£PSF	Date
16	G	1	657	£337,500	£514	Sep-18
25	G	1	417	£355,000	£851	Sep-18
2	G	1	431	£299,950	£696	Jun-18
3	G	1	594	£325,000	£547	Jun-18
18	G	1	683	£340,000	£498	Jun-18
20	G	1	560	£310,000	£554	Jun-18
42	2	1	480	£335,000	£698	Mar-18
43	2	1	509	£340,000	£668	Mar-18
1	G	2	758	£415,000	£547	Oct-18
15	1	1	705	£340,000	£482	Jan-19
31	1	1	625	£332,500	£532	Nov-18
32	1	1	655	£325,000	£496	Oct-18
34	1	1	469	£295,000	£629	Sep-18
44	2	1	566	£325,000	£574	Oct-18
48	2	2	785	£430,000	£548	Jan-19
51	2	2	721	£440,000	£610	Oct-18
Average			601	£346,559	£590	

Jigsaw, Green Man Lane, West Ealing, W13 0UF (Phase 3)

- 5.21 This development by A2 Dominion comprises new apartments, maisonettes and houses; it started in 2013 and is a nine year, five phase project replacing 464 flats with a mix of 770 one to four bedroom homes. The regeneration scheme also includes an eco-friendly energy centre, community café, public parks, play areas and a new primary school. This development lies in close proximity to West Ealing station and approximately 1.5 miles south of the subject property. Relevant sales include:

Plot ref	Floor	Bed	Sq Ft	Price	£PSF	Date
B6(II).1.1	1	2	811	£607,500	£749	Mar-18
B6(II).1.4	1	2	815	£600,000	£736	Mar-18
B6(II).2.1	2	2	811	£615,000	£758	Mar-18
B6(II).2.4	2	2	815	£607,500	£745	Mar-18
B6(II).3.1	3	2	811	£622,500	£768	Mar-18
B6(II).4.1	4	2	811	£632,500	£780	Mar-18
B6(II).4.4	4	2	815	£622,500	£764	Mar-18
B6(II).5.1	5	2	811	£640,000	£789	Mar-18
B6(II).5.4	5	2	815	£632,500	£776	Mar-18
B6(II).6.1	6	2	811	£655,000	£808	Mar-18
Average			813	£623,500	£767	

- 5.22 Following a period of no new releases and a delay for Covid lockdown, there has been a “quiet release” of a number of further units, as follows:

Plot ref	Floor	Bed	Sq Ft	Price	£PSF	Date
B4.1.4	1	1	539	£430,000	£798	Jun 2020
B4.1.5	1	2	838	£599,950	£716	Jun 2020
B4.2.1	2	2	843	£612,500	£727	Jun 2020
B4.2.5	2	2	838	£612,500	£731	Jun 2020

Westgate House, Hanger Hill, Ealing, W5 1YY

- 5.23 This development by Galliard Homes comprises a former office building, converted into residential, with all units benefitting from a modern specification, including comfort-cooling and designer kitchens with integrated appliances, an interior-designed reception foyer and lounge with a 24-hour concierge and lifestyle facilities such as a fully-equipped gym, sauna and steam room, plus a communal terrace lounge with an adjoining screen room. Some apartments also contain an amount of exterior space. This development lies within a superior location, adjacent to Hanger Lane Underground Station and approximately 2.3 miles west of Gurnell Leisure Centre. We have detailed the most recent asking prices below, as well as some of the more historic transactions which have sold.

Asking Prices

Plot ref	Floor	Bed	Sq Ft	Price	£PSF	Date
6.16	6	2	601	£595,000	£990	Jun-20
8.1	8	2	775	£715,000	£923	Jun-20
7.16	7	1	594	£545,000	£918	Jun-20
G.08	G	1	429	£395,000	£921	Jun-20
G.27	G	1	512	£375,000	£732	Jun-20
4.54	4	Studio	352	£325,000	£923	Jun-20
6.23	6	Studio	351	£335,000	£954	Jun-20
UG.56	UG	Studio	350	£305,000	£871	Jun-20
4.57	4	Studio	348	£325,000	£934	Mar-20
1.3	1	1	506	£415,000	£820	Dec-19
3.04	3	1	480	£430,000	£896	Dec-19
G.12	G	1	436	£375,000	£860	Dec-19
G.13	G	1	516	£407,500	£790	Dec-19
G.20	G	1	451	£407,500	£904	Dec-19
UG.39	UG	1	547	£370,000	£676	Dec-19
G.08	G	1	419	£378,000	£902	Dec-19
UG.54	UG	Studio	352	£299,000	£849	Dec-19
G.25	G	1	554	£366,500	£662	Dec-19
1.28	1	2	615	£530,000	£862	Sep-19
2.12	2	2	690	£560,000	£812	Sep-19
UG.52	UG	Studio	348	£299,000	£859	Sep-19
Average			487	£416,786	£860	

Sold Prices

Plot ref	Floor	Bed	Sq Ft	Price	£PSF	Date
3.04	3	1	480	£435,000	£906	Sep-18
3.04	3	1	480	£435,000	£906	Sep-18
6.2	6	1	448	£405,000	£904	Sep-18
7.13	7	1	552	£482,500	£874	Sep-18
G.08	G	1	419	£378,000	£902	Sep-18
G.12	G	1	436	£375,000	£860	Sep-18
G.20	G	1	451	£383,000	£849	Sep-18
G.22	G	1	463	£347,000	£749	Sep-18
G.27	G	1	512	£361,500	£706	Sep-18
UG.39	UG	1	547	£368,500	£674	Sep-18
2.3	2	1	501	£425,000	£848	Jun-18
3.01	3	1	476	£420,000	£882	Jun-18
G.13	G	1	516	£413,000	£800	Jun-18
G.19	G	1	451	£383,000	£849	Jun-18
G.25	G	1	554	£366,500	£662	Jun-18
Average			486	£398,533	£825	

The Rise, 257 Ealing Road, Wembley, HA0 1GH

- 5.24 This development, by Metropolitan, comprises one, two and three bedroom apartments located close to the revitalised waterside in Alperton. All units are fitted out to a good specification, with integrated kitchen appliances and high quality finishes. This scheme is located in close proximity to Alperton Underground Station and approximately 2.4 miles west of the subject property. We have detailed the most recent asking prices below, as well as some of the more historic transactions which have sold.

Asking Prices

Plot ref	Floor	Bed	Sq Ft	Price	£PSF	Date
A-09	2	1	546	£320,000	£586	Jun-20
A-14	2	1	567	£322,500	£569	Jun-20
A-23	3	1	561	£349,950	£624	Sep-19
A34	4	1	560	£360,500	£644	Sep-19
8	2	2	679	£405,000	£596	Jun-20
A-10	2	2	767	£430,000	£561	Jun-20
A-11	2	2	741	£425,000	£574	Jun-20
A-32	4	2	766	£435,000	£568	Jun-20
A-39	5	2	689	£405,000	£588	Jun-20
A-44	5	2	833	£437,000	£525	Jun-20
A-29	4	2	748	£480,000	£642	Sep-19
B1-40	6	3	1046	£560,000	£535	Jun-20
Average			709	£410,829	£584	

Sold Prices

Plot ref	Floor	Bed	Sq Ft	Price	£PSF	Date
A-12	2	2	796	£502,000	£631	Sep-18
A-15	3	2	689	£482,000	£700	Sep-18
A-26	4	2	833	£512,000	£615	Sep-18
A-27	4	2	748	£497,000	£664	Sep-18
A-31	4	2	689	£499,500	£725	Sep-18
A-38	5	2	688	£482,000	£701	Sep-18
A-39	5	2	689	£479,500	£696	Sep-18
Average			733	£493,429	£676	

Regency Heights, London, NW10

- 5.25 Regency Heights is a residential led mixed use development to provide three new courtyard blocks, ranging from 5 – 27 storeys in height comprising 807 residential units and some commercial space on the ground floor. Developed by Fairview Homes, this scheme launched in April 2019, with one beds starting at £379,000, two beds from £550,000 and three beds from £639,000. As of June 2019, 33 units had sold and 92 units had sold by the end of Q1 2020. All units are fitted out to a high specification, with integrated appliances in the kitchen and contemporary finishes throughout. We have detailed the most recent asking prices below, as well as some of the more historic transactions which have sold.

Asking Prices

Plot ref	Floor	Bed	Sq Ft	Price	£PSF	Date
367	1	1	549	£370,000	£674	Jun-20
383	4	1	549	£389,000	£709	Jun-20
391	5	1	549	£392,000	£714	Jun-20
392	5	1	549	£392,000	£714	Jun-20
399	6	1	547	£396,000	£724	Jun-20
413	8	1	551	£399,000	£724	Jun-20
473	9	1	595	£416,000	£699	Jun-20
360	1	1	549	£380,000	£692	Jun-20
406	7	1	547	£398,000	£728	Mar-20
627	4	1	549	£389,000	£709	Mar-20
628	4	2	547	£389,000	£711	Mar-20
237	13	2	689	£510,000	£740	Jun-20
244	14	2	689	£515,000	£747	Jun-20
364	2	2	680	£448,000	£659	Jun-20
396	6	2	680	£460,000	£676	Jun-20
410	8	2	680	£460,000	£676	Jun-20
469	8	2	672	£468,000	£696	Jun-20
472	9	2	777	£512,000	£659	Jun-20
397	6	2	786	£499,000	£635	Mar-20
374	3	3	1,001	£600,000	£599	Mar-20
415	8	3	1,095	£630,000	£575	Mar-20
400	6	Studio	500	£367,000	£734	Jun-20
468	8	Studio	525	£372,000	£709	Jun-20
407	7	Studio	500	£370,000	£740	Jun-20
414	8	Studio	500	£369,000	£738	Mar-20
186	6	Studio	487	£355,000	£729	Mar-20
Average			629	£432,500	£697	

Sold Prices

Plot ref	Floor	Bed	Sq Ft	Price	£PSF	Date
65	-	Studio	495	£358,000	£723	Dec-19
58	-	Studio	495	£375,000	£757	Dec-19
64	-	1	549	£416,000	£757	Dec-19
56	-	2	818	£525,000	£641	Dec-19
59	-	3	1,087	£630,000	£579	Dec-19
Average			689	£460,800	£691	

St Bernard's Hospital (Sites 2 & 3), Ealing, UB1 3EU

- 5.26 This scheme comprises the redevelopment of St Bernard's Hospital to provide 257 residential units. There are two parts to this development, Site 2 was developed by Westcombe Homes, comprising 92 units including 78 private. This completed during Q3 2018 and there have been five units left to be sold since the end of Q4 2019. The current pricelist shows one beds at £329,950, two beds from £399,950 at an average of £684 psf. Site 3 contains 214 units but is still currently an operational hospital. We have detailed the most recent asking prices below, as well as some of the more historic transactions which have sold.

Asking Prices

Plot ref	Floor	Bed	Sq Ft	Price	£PSF	Date
Tulk 01	G	1	543	£329,950	£608	Jun-20
Tulk 02	G	1	517	£329,950	£638	Jun-20
Clerkenwell 29	1	1	546	£335,000	£614	Dec-19
Clerkenwell 36	2	1	546	£330,000	£604	Sep-19
Clerkenwell 24	G	1	567	£335,000	£591	Sep-19
Clerkenwell 41	1	2	531	£399,950	£753	Jun-20
Clerkenwell 42	2	2	681	£429,000	£630	Jun-20
Clerkenwell 43	2	2	531	£429,000	£808	Jun-20
Clerkenwell 06F	G	2	870	£449,000	£516	Dec-19
Clerkenwell 21	G	2	806	£435,000	£540	Dec-19
Clerkenwell 28	1	2	770	£425,000	£552	Sep-19
Clerkenwell 35	2	2	770	£430,000	£558	Sep-19
Clerkenwell 37	2	2	703	£435,000	£619	Sep-19
Clerkenwell 39	2	2	520	£430,000	£827	Sep-19
Average			636	£394,418	£633	

Sold Prices

Plot ref	Floor	Bed	Sq Ft	Price	£PSF	Date
24	-	1	560	£310,000	£553	Jan-20
23	-	1	570	£320,000	£560	Aug-19
31	-	1	570	£325,000	£569	Aug-19
38	-	1	570	£325,000	£569	Dec-18
40	-	1	592	£316,000	£533	Dec-19
19	-	2	743	£420,000	£565	Aug-19
32	-	2	850	£425,000	£499	Jul-19
15	-	2	883	£475,000	£538	Dec-18
Average			667	£364,500	£548	

- 5.27 From the evidence outlined above and our own market knowledge, we set out below the rates which we have adopted for each residential block:

Block	Ownership	NIA Sq m	NIA Sq ft	Rate per sq ft	GDV (£millions)
Block C & D	Private Residential	15,999	172,212	£656	£112.97
Block E & F	Private Residential	8,575	92,300	£656	£60.55
TOTAL		24,574	264,512		£173.52

- 5.28 As shown above, the applicant's FVA adopts a slightly higher private sales rate (average £668 per sq ft) compared with our adopted sales rate (average £656 per sq ft); the difference is under 2%. By adopting a higher level, they are suggesting an enhanced value scheme, producing a GDV in excess of a level we believe would be substantiated by a third party developer.

Car Parking:

- 5.29 The applicant has included value attributable to car parking on site and accounted for this in their GDV. Whilst there would no value in car parking allocated to affordable units or to the leisure centre (175 spaces – any income would accrue to the operation of the leisure centre), we believe there would be some value attributable to allocated car parking for the private units and therefore agree with this input.
- 5.30 However, given the different number of scenarios, there will be a varying value attributable to the car parking as there will be a different number of private units in each case. Assuming the same affordable housing percentage for each scenario is applied to the 160 total car parking spaces (i.e. Scenario 2 and 4 50% affordable housing – 80 private car parking spaces), this gives the Base Case and Scenario 1 104 spaces; Scenario 2 and 4 80 spaces; Scenario 3 and 5 160 spaces. We have attributed no value to the 8 surface spaces assuming these are needed for temporary access or DDA.
- 5.31 It is not clear how the applicant has broken down the income attributable to the car parking, as none is provided in the FVA. Nonetheless for the base case the applicant has adopted a total value of £2.20 million, which assuming the methodology discussed above, works out at c. £20,000 per unit. Whilst we believe this figure to be much higher than would normally be expected in Greater London, which see typical premiums of £10,000 - £15,000 per space, the demand for parking in this location is likely to be high (compared to a town centre location, for example) and therefore we have also adopted this figure for our appraisals.

Affordable Housing:

- 5.32 The applicant has adopted a rate of £271.89 per sq ft for the LAR units and £510.63 per sq ft for the Shared Ownership units. We have separately appraised the value of Blocks A & B based upon theses being an affordable tenure and have adopted the following values (monies released after allowance for grant funding):

Residential Block	Ownership	NIA Sq m	NIA Sq ft	Rate per sq ft	GDV (£millions)
Block A	London Affordable Rent	6,580	70,826	£252.83	£17.91
Block B	Shared Ownership	5,631	60,612	£474.38	£28.75
TOTAL		12,211	131,438	£355.00	£46.66

- 5.33 This equates to a GDV for the affordable housing in the base appraisal of £46.66 million (or £59.2 million, less the £12.54million GLA Grant as per Scenario 1). Whilst the above represents the particular circumstance of Gurnell,

for the purposes of this FVA to assessing planning requirements, we have assumed similar funding would be available to a notional bidder in the market.

- 5.34 To replicate the proposed model from an independent perspective, we have assumed that, that because of the Council's desire and case for further social housing within the Borough, there would similar be grant funding available to a hypothetical third party developer for a scheme such as this, to enable it to meet the Council's objectives. This assumption is only suitable for stress testing the FVA, as if reverting to the open market, any bidder would need to renegotiate any funding from scratch.

Commercial Elements

Retail rents:

- 5.35 The applicant's FVA has adopted a rate of £14.00 per sq ft for the ground floor commercial accommodation (two units of A1 – A3 use), however have not provided any evidence to support this figure. The proposed development is residential led, with this commercial element being more qualitative having very limited impact on value; any variance in rates per sq ft adopted here make little difference to the final figure. To put this into context, in the applicant's base appraisal, the value of the commercial element of the scheme accounts for just 0.5% of the total GDV.
- 5.36 Given the subject property is not within an established retail location, we are not aware of any retail transactions which have taken place in the last few years. However if the search is expanded to similar remote locations, rents for spaces between 1,000 sq ft – 10,000 sq ft, in un-established retail pitches, generally range from £12.50 - £25.00 per sq ft, with the market having weakened over the last 12 – 18 months.
- 5.37 Given the above, we believe that a rate of £14.00 per sq ft, as adopted by the applicant's FVA, is appropriate given the peculiarities of the retail pitch and the lack of comparable evidence to suggest otherwise.
- 5.38 The FVA has also suggested a rent free period of 6 months. We believe this is a reasonable assumption and have also adopted this within our appraisal.

Retail yields:

- 5.39 As above, due to the location of the subject property in a predominantly residential area, there have been limited retail transactions within close proximity. We do however consider the FVA yield assumptions of 6.50% reasonable and have maintained these within our appraisal.

Gross Development Value:

- 5.40 Based off the above adopted values, we have arrived at a total Gross Development Value of £225,532,451 or say £225.53 million.
- 5.41 Our estimate of GDV is around 2% lower than that adopted by the applicants in their FVA. This is within a typical valuation variance for a large scheme such as this and has minimal impact on its viability.

Development Costs

Build Costs

- 5.42 The FVA has taken its build costs from a Gardiner & Theobald (“G&T”) Stage 2 Cost Plan prepared for Eco World London on 25 October 2019. The figure adopted in the FVA is a total basic build cost of c. £176 million.
- 5.43 To assist with an independent review, Core 5 have reviewed the build costs on behalf of LBE and these are set out in Appendix 4.
- 5.44 Core 5’s estimates are above those of G&T, suggesting that the development will cost more to build than the applicant has allowed in its FVA. Following the independent advice to LBE from Core 5, set out below is a summary of the costs we have adopted in our base appraisal and a comparison to the FVA adopted costs.
- 5.45 It is worth noting that we have also had sight of correspondence relating to splitting the cost between the different elements of the scheme, to allow different contractors and different parties to be responsible for each element. We understand that these conversations are still on-going and unlikely to event into a cost saving for anybody.
- 5.46 As shown below, the applicant has allocated a ‘blanket’ rate of £232.71 per sq ft across all elements of the scheme based on the G&T figure of c. £175 million.
- 5.47 The costs we have adopted, as per Core 5’s analysis, are dated August 2019 (12 months prior to the issuing of this report). In June 2020 Core 5 confirmed that over the last 12 months, whilst some have predicted slight cost inflation (of say 1%-2% year on year), others are predicting a similar level of deflation and there will be no certainty until contracts are finalised. Therefore for the purposes of this analysis, we have adopted the costs in Core 5’s analysis as at August 2019 in our appraisal and assumed 0% change to July 2020, as shown below.

Element	Applicant’s FVA (based G&T)		LSH analysis of Core 5	
	£ per sq ft	Total (£million)	£per sq ft	Total (£million)
Affordable Housing (Blocks A & B)	£232.71	£41.54	£240.00	£41.43
Private Housing (Blocks C – F)	£232.71	£82.32	£259.00	£91.62
Commercial	£232.71	£1.20	£176.00	£0.98
Leisure Centre	£232.71	£19.78	£340.00	£29.93
Basement and Other	£232.71	£31.06	£190.00	£26.26
Total	£232.71	£175.89	£246.61	£189.69

- 5.48 As the applicant has provided an overall cost as opposed to breaking down each element, it is impossible to assess where the main differences lie. LBE’s advisors, Core 5 estimate that the development will cost circa £15 million more as a base build cost than that calculated by G&T. This is important not only because it is 8.5% more expensive in total, but also as a number of other costs (such as professional fees and finance etc) are calculated as a percentage of the build cost and therefore these will all be more expensive too. This would have the effect of reducing the profitability of the scheme.
- 5.49 The Core 5 analysis does suggest that the G&T calculation of build cost is unlikely to be bettered by a third party contractor and this is probably as competitive as the build costs can get. We have accepted Core 5’s conclusion.

Fees

- 5.50 The FVA has adopted professional fees at 10% of build cost. Whereas an analysis could break this down into individual fees for architects, quantity surveyors, project managers etc, a high level review suggests that this overall level is appropriate. Whereas for small schemes, professional fees may be in a bracket of 12.5% - 15% of build cost, with economies of scale for a scheme such as this, a figure of 10% appears reasonable and we have adopted the same within our assessment.

Planning Fees and Obligations

- 5.51 We would normally expect to see provision for planning fees included as a separate line. Although quite a considerable cost has already been incurred by the developers, as cost already spent this would not show up in a forward looking appraisal, as these costs cannot be recovered. We understand from James R Brown that in their FVA they have included any further planning fees within their provision for professional fees overall at 10%.
- 5.52 We have adopted a similar stance within our analysis; any fees beyond this would further increase the cost of the development, and reduce its profitability.
- 5.53 We understand that LBE does not have an adopted CIL Charging Schedule and is still relying on S106 negotiations on a case by case basis to meet infrastructure requirements and local needs.
- 5.54 The London Mayoral CIL would be payable based on floor area.
- 5.55 Within the FVA, account has been taken for the Mayoral CIL and an assumption has been made for S106 financial provisions. We understand from the applicants that this is based on an assessment of the minimum requirements which are likely to be made by Local Planning Authority to meet planning policy in this area.
- Mayoral CIL £2,500,000
 - Section 106 Contributions £5,000,000
- 5.56 The Section 106 may ultimately be closer to £4,750,000, which provides a small cost saving and improves the return to the developer marginally, however not sufficiently to materially change any calculations or conclusions. It should be noted that if there is any increase in the S106 contribution required, the cost of the development will increase and the profitability will be further eroded.

Marketing, letting and legal fees

- 5.57 These fees are applied to the completed development to account for costs incurred in disposal. The applicant has adopted the following assumptions in the FVA which we have compared to our own approach:

Cost	Applicant's FVA	LSH Analysis
Marketing	(inc. with Agent's fee)	1% of Private GDV
Sales Agent Fee	1.50% of Private & Affordable GDV (inc. Marketing)	1.50% of Private GDV
Sales Legal Fee:	£600,000	0.25% of Private GDV
Letting Agent Fee:	0%	10% of Commercial Rent
Letting Legal Fee:	0%	5% of Commercial Rent

- 5.58 There are some discrepancies; we have applied a sales agent's fee to the private accommodation only, whereas the FVA also applies it to the affordable rent and shared ownership. We do not believe these costs would be incurred at this level here. Conversely, we have made a further allowance of 1% for marketing costs on the private flats, whereas the FVA takes this included with the sales agent's fees.
- 5.59 Given the quantum of units to be delivered, an appointed joint or sole agent may accept a lower than usual percentage fee, however for development such as this it would be usual to establish a show home and onsite presence which will incur cost; we believe a 1.50% all-encompassing sales fee is insufficient. The FVA takes a fixed legal fee, whereas we have used a percentage adjustment. We have also made some provision for letting the shop for both agents and legal fees which has been omitted from the applicant's FVA.
- 5.60 Any increase in fees will have an incrementally detrimental effect to the profitability of the proposed scheme, however the percentages are relatively small.

Other Fees and costs

- 5.61 Although the site is currently taken with £nil value, there would be notional costs in acquiring the site, which the FVA has taken as follows:
- £40,000 Acquisition Agent Fee
 - £30,000 Acquisition Legal Fee
 - Stamp Duty: 4.85%
- 5.62 The applicant's FVA has not included provision for purchaser's costs which would ordinarily be attributable to the future sale of the commercial elements of the scheme (and any ground rents, if payable). We would normally anticipate Purchaser's Costs being allowed, however as this element is very small, the impact is minimal.

Interest

- 5.63 Interest comprises an important element, as it increases the cost of holding the land (although at nil value this is nominal), but also on the construction cost and selling or letting voids on completion. The FVA has taken an interest rate of 7.0%, defined as a blended yield between bank finance, equity finance and some mezzanine.
- 5.64 Given the nature of the site of the proposed development, it would only be feasible to be undertaken by a substantial company; as such, it would likely have access to funds at a relatively attractive borrowing rate. Any additional return beyond this would normally come out of the developer's profit. Whereas the FVA uses a blended rate of 7.0%, we have taken a more commercial market rate of 6.0%, reducing the interest payment costs slightly.

Site Value

- 5.65 As the developer's return falls below that which is acceptable in the market, the FVA has assumed a site value of £nil. Given our appraisal produces a similar result, we have also concluded a site value of £nil.

Conclusions from FVA and Base Scenario Analysis

- 5.66 The applicant's Financial Viability Analysis, calculated on the assumptions set out above show this proposal making a net loss of £7.213 million, a loss of -3.04% on costs or -3.14% on GDV. Clearly, on this analysis it is not feasible to undertake the development without external grant funding, or alterations to the type and quantity of accommodation provided. With the scheme making a loss, it would not take place and hence the LBE would not obtain a replacement for the existing leisure centre.
- 5.67 In our analysis, despite slightly different inputs, we reach a broadly similar conclusion for the base case, although the envisaged loss is higher at £27.91 million or -11.10% on costs. Although our Gross Development Value is very similar to the Applicant's FVA, this is offset by the higher envisaged build cost overall leading to a higher loss.
- 5.68 Concluding from the above, the Base Scenario is not a financially viable option.
- 5.69 You requested our views on a series of alternative scenarios; these are set out in Section 6.

6. ALTERNATIVE SCHEMES

Scenario 1 Analysis

- 6.1 **Scenario 1** – “The Base Case including the £12.5 million Council contribution and £12.544 million GLA grant. This scenario is the truest reflection of what is being achieved in financial terms. Establish what profit is achieved (in absolute and percentage terms)”.
- 6.2 For this scenario, we have included the GLA affordable housing grant funding within the price of the units reported, however have specifically set out LBE contribution as additional revenue. Essentially, this models the scheme with grant funding, but has the same affordable housing percentage as the Base Scenario.
- 6.3 As in the Base Scenario, we have assumed additional revenue attributable to the car parking allocated the private units of c. £20,000 per unit, adopting the applicant’s assumption of £2.20 million.
- 6.4 The applicant’s FVA, calculated on these assumptions set out above show this scenario making a profit of £22.33 million, equating to 9.71% on cost.
- 6.5 In our analysis the envisaged profit is lower at £5.125 million or 2.11% on costs.
- 6.6 Although our Gross Development Value is very similar to the Applicant’s FVA, this enhanced realisation is offset by the higher envisaged build cost overall leading to a higher loss. Whilst our analysis models produces a lower profit than the applicant’s FVA, this does not have a bearing on the merits of the scheme in other terms.
- 6.7 Concluding from the above, Scenario 1 is not a financially viable option.

Scenario 2 Analysis

- 6.8 **Scenario 2** – “The quantum of development that would be required to drive a reasonable commercial profit percentage based upon a 50% affordable housing, i.e. the profit level is set at the level expected by a typical developer and the quantum adjusts until this is achieved”.
- 6.9 For this scenario, as above we have included the GLA affordable housing grant funding in the price of the units and specific LBE grant funding as additional revenue. With more affordable units, this scenario assumes a greater provision of grant funding (than in Scenario 1); if however this additional grant funding could not be accessed, then this scenario scheme would be even less viable.
- 6.10 Under this analysis, the element of quantum is determined in order to drive a ‘commercially acceptable’ profit, which the applicant has deemed in their FVA to be 17.50% (on cost). We have adopted this level as appropriate as well, although have taken the developers to only make this amount on the private housing, with a lesser return on the affordable and shared ownership, which carries less commercial risk than open market housing. The existing split on the planning application is 67% private housing and 33% affordable and shared.
- 6.11 As in the Base Scenario, we have also assumed additional revenue attributable to the car parking allocated the private units, adopting £1.60 million (c. £20,000 per unit). As per Scenario 1, we have also included the affordable housing grant funding (on a per unit basis) and the £12.5 million funding from LBE.

- 6.12 The applicant's FVA concludes that the quantum of development required to drive a reasonable commercial profit, would comprise 582,531 sq ft of development, almost 50% more development than the current application.
- 6.13 In our analysis, we have concluded that the quantum of development that would be required to drive a reasonable commercial profit (17.50%) be higher at 909,822 sq ft of residential floor space, a significant increase (by c. 130%) and far more than concluded by the applicant.
- 6.14 It is difficult to compare the two models. The applicant's FVA has adopted a more simplistic blanket cost rate across the development as a whole and therefore as additional accommodation is added, it is at the same cost whether it is social housing, private housing or other. Following the advice given to LBE by Core 5, we have separated these rates.
- 6.15 In summary, only the private residential sales deliver a profit and positive site value, whereas the other development delivers a loss; as the losses are increased to reach 50% of the overall provision, the quantum of profitable development needs to be increased to compensate, and hence the overall amount of accommodation needed increases.
- 6.16 In either case, both analyses conclude a significant increase in development would be required to achieve a commercial minded profit with 50% balanced affordable housing. Taking account of the planning restrictions on new development for this MOL site, we do not consider it prudent to assume that the site could accommodate such an increase in density, even to the lower figure calculated by the applicant's FVA.

Scenario 3 Analysis

- 6.17 **Scenario 3** – “The quantum of development that would be required to drive a reasonable commercial profit percentage based upon no affordable housing, i.e. the profit level is set at the level expected by a typical developer and the quantum adjusts”.
- 6.18 Under this analysis, the element of quantum is determined in order to drive a ‘commercial acceptable’ profit, which again the applicant has deemed in their FVA to be 17.50%. We have also adopted this level.
- 6.19 As per Scenario 1, we have also included the £12.5 million contribution from LBE, but no GLA affordable housing grant (as there is none provided).
- 6.20 As in the Base Scenario, we have also assumed additional revenue attributable to the car parking allocated the private units, adopting £3.20 million. In their FVA, the applicants have used only £2.20 million, similar to the previous scenarios. In our view, as discussed earlier in this report, a scenario of 100% private housing would leave 160 available spaces, each subject to a premium (c. £20,000) = £20k x 160 = £3.2m
- 6.21 The applicant's FVA concludes that the quantum of development which would be required to drive a reasonably commercial profit in this scenario, would involve 451,852 sq ft of development. The applicants have targeted a 20% profit level.
- 6.22 In our analysis, we have concluded the quantum of development which would be required to drive a reasonable commercial profit (17.50%) would involve 539,604 sq ft of residential floor space, an increase of 37%.
- 6.23 It is difficult to directly compare the two models due to the inherently different underlying assumptions with regard to costs. However, we can conclude that a 100% market scheme, with a normal requirement for developer's profit would necessitate an increase in built development.

Scenario 4 Analysis

- 6.24 **Scenario 4** - “The quantum of development that would be required based on the same profit sum (approx) as per Sensitivity Scenario 1, but with 50% affordable housing i.e. the profit level remains constant and the quantum of homes adjusts”.
- 6.25 For Scenario 4, we have included the GLA affordable housing grant funding (pro rata, per unit built) in the price of the units; therefore this requires more grant funding than in Scenario 1 (as there are more affordable units). If additional grant funding cannot be accessed, then this Scenario would be even less viable. We have again included LBE contribution as additional revenue.
- 6.26 Under this analysis, the element of quantum is determined in order to drive the same profit level as achieved in Scenario 1, but adopting a scheme with 50% affordable housing.
- 6.27 As in the Base Scenario, we have also assumed additional revenue attributable to the car parking allocated the private units, adopting £2.00 million.
- 6.28 The applicant’s FVA concludes that the quantum of development required to derive the same profit as their analysis of Scenario 1, would involve 409,821 sq ft of development.
- 6.29 In our analysis, we have concluded the quantum of development required to derive the same profit level as Scenario 1 would involve 453,902 sq ft of residential floor space, an increase of 14% on the applicants’ assessment.
- 6.30 Again, it is difficult to directly compare the two models due to the different underlying assumptions with regard to costs. Moreover, given the differing profit outcomes in Scenario 1, we are targeting a lower profit level, due to the assumptions made in the Base Scenario, as discussed above. Overall our conclusion is that a substantially larger development would be required overall (potentially impinging further into the MOL), with further GLA affordable grant funding also needed.

Scenario 5 Analysis

- 6.31 **Scenario 5** - “The quantum of development that would be required based on the same profit sum (approx) as per Sensitivity Scenario 1 but with no affordable housing, i.e. the profit level remains constant and the quantum of homes adjusts”.
- 6.32 Under this analysis, the element of quantum is determined in order to drive the same profit level as achieved in Scenario 1, but adopting a scheme with 0% affordable housing.
- 6.33 As in the Base Scenario, we have also assumed additional revenue attributable to the car parking allocated the private units, adopting £3.20 million.
- 6.34 The applicant’s FVA concludes that the quantum of development required to derive the same profit as their analysis of Scenario 1, would involve 327,407 sq ft of development around 13% less than that in the application.
- 6.35 In our analysis, we have concluded the quantum of development that would be required to derive the same profit level as Scenario 1 would involve 315,229 sq ft of residential floor space, a decrease of 20% against the present application.

- 6.36 Again, it is difficult to directly compare the two models due to the inherently different underlying assumptions with regard to costs. Moreover, given the differing profit outcomes in Scenario 1, we are targeting a lower profit level, due to the assumptions made in the Base Scenario, as discussed above.
- 6.37 Based on our broad assumption above, with the lesser floor-space, we estimate that a market-only scenario would generate between c. 485 dwellings – 505 dwellings (taking an average of 650 sq ft per dwelling), depending on whether our or the applicant's assumptions are employed.

7. RESULTS AND CONCLUSIONS

Results Summary

7.1 Below we summarise our appraisals in comparison to the applicant's appraisals, using profit on cost as a measure of viability. All Scenarios assume a site value of £nil, given the lack of profit each generates.

Scenario	Applicant's FVA			LSH Analysis			Variance (£millions)
	Profit on Cost £million	% on Cost	Quantum (sq ft)	Profit on Cost £million	% on Cost	Quantum (sq ft)	
Base	(£7.21)	(3.04)%	395,590	(£27.91)	(11.10)%	395,590	£20.70
1	£22.33	9.71%	395,590	£5.12	2.11%	395,590	£17.18

Scenario	Applicant's FVA			LSH Analysis			Variance (sq ft)
	Profit on Cost £million	% on Cost	Quantum (sq ft)	Profit on Cost £million	% on Cost	Quantum (sq ft)	
2	£49.95	17.00%	582,531	£75.02	16.92%	909,822	327,291
3	£52.91	20.00%	451,852	£52.28	16.42%	539,604	87,752
4	£22.32	9.95%	409,821	£2.61	1.00%	453,902	44,081
5	£22.38	10.56%	327,407	£3.07	1.39%	315,299	(12,108)

7.2 As is seen from the table above, there is a small difference in the base case model and Scenario 1 from the LSH appraisal when compared to the applicant's FVA, although the conclusion is similar. Most of the difference is explained in the increased costs (as advised to LBE by Core 5) and decreased values of private sales values within LSH's inputs, making the scheme less viable than suggested in the applicant's FVA.

7.3 It is difficult to directly compare scenarios 2 – 5 produced by the applicant in their FVA with the LSH appraisals, because the applicant's FVA applies a blanket cost to the entire development, rather than splitting out the individual elements.

7.4 Given LSH's analysis of the Base Scenario and Scenario 1 results in a lower profit outcome than that calculated in the applicant's FVA, in the latter Scenarios 4 and 5 a lower profit is targeted, hence Scenario 5 (i.e. the quantum of development that would be required based on the same profit sum (approx) as per Sensitivity Scenario 1 but with no affordable housing) appearing more favourable, with a lower quantum of development required to meet the lower profit level targeted.

7.5 In conclusion, none of the options appraised appears to generate a normal commercial profit and therefore:

- The proposed scheme appears to optimise the development of the site.
- LBE will not be likely to be able to negotiate higher levels of financial terms for S106 Settlement without negatively impacting upon scheme viability.
- It will not be feasible to obtain more social housing (and deliver the leisure centre) without further capital or grant funding.

- The development is reliant on grant funding.
- The development is likely to seek further value engineering on build costs.
- The developers appear to be able source more favourable financing costs than others in the market, assisting in the delivery of the scheme.

8. ASSUMPTIONS, LIMITATIONS AND REGULATORY INFORMATION

Information

Any third party information supplied by the client, professional advisors, investigation agencies, Local Authorities, statutory bodies and other stated sources is accepted as being correct unless otherwise specified.

Development Proposals

For the purpose of this Report and Valuation we have assumed that any proposed works will be completed in accordance with the details provided, to a reasonable standard of workmanship and in accordance with relevant regulations.

Services

Unless otherwise stated we understand that all mains services are available to the property, including electricity, gas, water and mains drainage, although we have not made any enquiries of the respective service supply companies. We further assume that any of the services or associated controls or software are in working order and free from defect.

Condition

We have not carried out a building survey of the property as this was not within the scope of our instructions, nor have we inspected those parts of the property which are covered, unexposed or inaccessible, and for the purpose of this report, such parts have been assumed to be in good repair and condition.

We cannot express an opinion about, or advise upon the condition of un-inspected parts and this report should not be taken as making any implied representation or statement about such parts.

Further, we have not tested any of the drains or other services, and for the purpose of this valuation we have assumed that they are all operating satisfactorily and no allowances have been made for replacement or repair.

The property has been valued with due regard to its appropriate existing state of repair and condition, including reference to its age, nature of construction and functional obsolescence. We believe we have formed a general opinion of the state of repair of the property in so far as it is likely to affect our valuation.

It is assumed that normal periodic maintenance will be carried out to maintain the property in a state of repair fit for its present use.

It is assumed that the condition of the property at the date of valuation is identical to that found at the date of our inspection.

Plant and Machinery

Unless otherwise specified all items normally associated with the valuation of land and buildings are included in our valuations and reinstatement cost assessments (if provided), including:-

Fixed space heating, domestic hot water systems, lighting and main services supplying these, sprinkler systems and associated equipment, water, electricity, gas and steam circuits not serving industrial or commercial premises, substation buildings, lifts and permanent structures including crane rails where forming an integral part of the building structure, fixed demountable partitions, suspended ceilings, carpets, drains, sewers and sewerage plants not primarily concerned with treating trade effluent, air conditioning except where part of a computer installation or primarily serving plant or machinery.

Unless otherwise specified the following items are excluded:-

All items of processed plant and machinery, tooling and other equipment not primarily serving the building, cranes, hoists, conveyors, elevators, structures which are ancillary to, or form part of an item of process plant and machinery, sewerage plants primarily concerned with treating trade effluent, air conditioning where part of a computer installation or primarily serving plant and machinery, and water, electricity, gas, steam, and compressed air supplies and circuits serving industrial and commercial processes.

Unless otherwise specified, no allowance is made for the cost of repairing any damage caused by the removal from the premises of items of plant and machinery, fixtures and fittings.

In the case of petrol filling stations, hotels and other properties normally sold and valued as operational entities, all items of equipment normally associated with such a property are assumed to be owned and are included within the valuation unless otherwise specified.

Defective Premises Act 1972

Liabilities or obligations or any rights there under, whether prospective or accrued are not reflected in valuations unless actually specified.

Asbestos and Deleterious Materials

This material was regularly used from 1960s to 1980s. The cost of maintenance, alteration and repair of any building where asbestos is present can be significantly increased because of the need to take appropriate precautions under The Control of Asbestos Regulations 2012 (amended February 2016). This in turn may impact value.

Under the terms of these Regulations a Dutyholder is required to manage asbestos in non-domestic premises. Typically, this encompasses a positive obligation to assess the likelihood of asbestos containing materials (ACMs) being present at the premises. This can be achieved either by reference to bona fide statements confirming that ACMs were not incorporated into the construction of the building, or by commissioning an asbestos survey. The results of that survey would then be interpreted, acted upon and recorded in an Asbestos Management Plan. For the purpose of our report, we have assumed that, unless indicated to the contrary, a survey would not disclose any evidence of asbestos or deleterious materials in the construction of the subject, in circumstances where it is likely to have an effect on health or safety.

We have not arranged for any investigation to be carried out to determine whether or not any deleterious materials have been used in the construction of the property, or have since been incorporated and we are, therefore, unable to report that the property is free from risk in this respect. For the purpose of this valuation we have assumed that such investigation would not disclose the presence of any such material to any significant extent.

Composite Panel Cladding

If the property has composite panel cladding, this may have implications for insurance depending on the type of panelling used; this may have an adverse impact on value.

Many insurance companies are now requesting confirmation from the building owner/insured as to whether composite panels have been used and if so what make they are and whether they are approved for use by the Loss Prevention Council (LPC), it being virtually impossible to tell from external inspection only.

Unless advised to the contrary and addressed within our report our valuation assumes that that there are no issues with the type and nature of the panelling utilised and that the building is fully insurable on standard commercial terms.

Contamination

Unless otherwise stated herein, we have not been instructed to commission a formal audit in respect of the subject site in relation to the potential presence of contamination. Furthermore, our brief enquiries have provided no evidence that there is a significant risk of contamination affecting the property or neighbouring property which would affect our valuation.

We have not carried out, nor are we qualified to carry out an Environmental Audit. Our comments herein are therefore merely a guide and should not be relied upon. If you require confirmation of the position, we strongly recommend that an initial Environmental Audit is carried out.

If we have been provided with third party reports we have accepted them as being correct.

We have assumed that any/all necessary decontamination works have been undertaken at the subject in its current and/or permitted use to be legally undertaken without contravention of any existing contamination related statute.

A purchaser in the market might, in practice, undertake further investigations than those undertaken by us. If those further investigations were to reveal contamination then this might reduce the value/s now reported.

Where property has been redeveloped we have assumed that any necessary de-contamination works required for the proposed redevelopment of the subject have been undertaken.

Contaminative Invasive Species

Unless otherwise informed we have assumed that there is no presence of any contaminative invasive species.

Ground Conditions

Unless otherwise stated, we have not been provided with a site investigation or geographical or geophysical survey. We have therefore assumed the ground has sufficient load bearing strength to support the existing structures (and/or any other structure which may be erected in the future) without exorbitant or excessive costs. It is further assumed that there are no underground minerals, archaeological remains etc which may have a detrimental impact on value.

For the purpose of this advice we have assumed that the ground conditions are satisfactory for a traditional method of construction. We have also assumed that there are no contaminating or other deleterious materials present which may prevent the development of the site in a traditional method or at normal cost levels. Furthermore, we have assumed that the site is capable of being serviced at a reasonable cost level, and that there would be no exorbitant or excessive off site costs relating to matters such as drainage, infrastructural adaptations etc.

If we have confirmed herein that the subject is located in an area of past mining activity, we recommend your solicitors instigate a mining search to comment upon the incidence of mining related settlement and location of mine shafts.

Flooding

Flood Risk - the Environment Agency website uses indicative Flood Plain maps to provide a general overview of areas of land in natural flood plains and therefore potentially at risk of flooding from rivers or sea. The maps use the best information currently available, based on historical flood records and geographical models and indicate where flooding from rivers, streams, water courses or the sea is possible.

The information relating to the likelihood of flooding is the Environment Agency's assessment of the likelihood of flooding from rivers and the sea at any particular location, based on the presence and effect of all flood defences, predicted floor levels, and ground levels. The probability or likelihood of flooding is described as the chance that a location will flood in any one year.

Drainage – surface water run off flooding, known as 'pluvial' flooding, at times of prolonged, exceptionally heavy downpours of rain, is becoming increasingly frequent given surrounding drains and sewers are not always able to cope. It can be made worse in urban areas where the ground consists mostly of hard surfaces, such that the rain flows straight off rather than soaking away. Rising groundwater levels resulting from heavier rainfall and reduces abstractions can also present problems.

Town Planning

We have made informal enquiries of the local planning and highway authorities and the information provided is assumed to be correct.

Unless otherwise stated, all planning information has been given via web based enquiries of the Local Planning Authority. In the absence of further information, we have assumed that the uses being carried out in each of the properties is an authorised planning use and that the buildings have been erected with full planning permission.

No formal search has been instigated and if reassurance is required we recommend that verification be obtained from your solicitors that the position is correctly stated in our report, that the property is not adversely affected by local authority proposals or requirements and that there are no outstanding statutory notices.

We have assumed that the properties and their value are unaffected by any matters which will be revealed by a local search and replies to the usual enquiries or by any statutory notice and that neither the properties nor their condition nor their present or intended uses are or will be unlawful.

We trust that your solicitors will check this information by taking out a local search and again, we would be pleased to advise further upon receipt of the confirmation of these details.

We have assumed that each property has full unconditional consent for the stated use and development described within.

For reference, following the Planning and Compulsory Purchase Act 2004, the old plan-making system is to be replaced by Local Development Frameworks (LDF). The LDF is not a single document or plan; rather, it is a suite of documents that combine to form the development plan for the area. The principal document is the Core Strategy, which sets the overall planning policy approach, which is supported by various Development Plan Documents (DPDs) for specific issues, such as site allocation.

Rating

Our enquiries are made based on the VOA web site, referenced by the property address. We are unable to confirm that there are no further assessments in relation to the property, listed under different addresses, or those which do not show on a normal search. If the Rating Assessment is important to the report recipient, solicitors or rating specialists should be instructed to undertake a formal search.

For reference the empty property rates for vacant commercial premises are 100% of the basic occupied business rate, after initial void periods have elapsed. For most properties, excluding industrial, the void period is 3 months. For industrial properties, the void period is 6 months.

Unless otherwise stated we have not investigated whether the property is subject to any transitional relief or phasing and are unable to comment in this respect.

Health and Safety Legislation

Our valuation assumes that, in so far as is relevant to the subject, the property complies with the requirements of the Office Shops and Railway Premises Act 1963 as well as any superseding statute. The Act provides for securing the health, safety and welfare of persons employed to work in office or shop premises and those employed to work in certain railway premises.

Fire Legislation

As from 1 October 2006 the Regulatory Reform (Fire Safety) Order 2005 came into force in England and Wales. Under this Order, Fire Certificates are no longer issued and existing certificates have been superseded by Risk Assessments. A Risk Assessment is required for all non-domestic properties, as well as tenanted domestic properties, and is to be carried out by a 'Responsible Person' as defined within the Order. The findings of any risk assessment must be recorded in writing where more than five or more persons are employed or the premises are licensed or there is an alterations notice.

The smoke and Carbon Monoxide Alarm (England) Regulations 2015 came into effect from 1 October 2015 requiring that landlords of residential property must provide (a) a smoke alarm on each storey of the premises on which there is a room used wholly or partly as living accommodation and (b) a carbon monoxide alarm in any room of the premises which is used wholly or partly as living accommodation and contains a solid fuel burning combustion appliance. A landlord has a responsibility to insure that the detectors are checked and in proper working order. It is assumed that the property is compliant in regard to the above regulations.

General Legislation

For the purpose of this report, we have assumed that the property complies with current fire regulations, building regulation controls, employment regulations, defective premises and health and safety legislation.

Discrimination

The Equality Act 2010 and subsequent updates, makes it unlawful for service providers to treat disabled people less favourably because they are disabled (unless there is a clear and fair reason) in relation to their access to their place of employment or education; their access to goods, services and facilities (although note that where private clubs are concerned, only those with 25 or more members are required to be compliant with the Act) and their access to the functions of public bodies.

Employers, educators and service providers must all make *reasonable* adjustments for disabled people to be able to access and use property they have a right or need to visit; this is not restricted to physical access.

Where a temporary or permanent physical feature makes it impossible, or unreasonably difficult, for disabled customers to make use of a service or place of education or work, the provider has to take reasonable measures to remove the feature; alter it so that it no longer has that effect; provide a reasonable means of avoiding the feature; or, provide a reasonable alternative method of making the service available to disabled people.

The test of reasonableness is about what is practical in the service provider's individual situation; what resources they might have (and the amount of any resources already spent on making adjustments); whether taking any particular measures would be effective in overcoming a particular difficulty; the extent to which it is practicable for the service provider to take the measures; the extent of any disruption which taking the measures would cause.

For the purpose of this report and valuation we have assumed that the property complies with the relevant requirements of the Equality Act 2010 ('the Act').

Sustainability

Investor and occupational decisions are increasingly being informed by a range of sustainability related metrics that are beginning to be developed and that can provide measures of some aspects of a property's sustainability characteristics, for example Energy Performance Certificates (EPCs) and BREEAM. Furthermore industry benchmarking of sustainability performance is becoming more common place.

Characteristics that may be considered are land use, design and configuration, construction materials and services, location and accessibility, fiscal and legislative considerations and management and leasing issues. If, at the date of valuation, the market does not differentiate (in terms of demand), between a building that displays strong sustainability credentials and one that does not, there will be no impact on value.

Energy Performance Certificates

EPCs contain information about the energy performance of a building. To meet the EU Energy Performance of Buildings Directive, EPCs must be produced by the 'relevant person' prior to marketing for property transactions including the sale, rent or construction of all buildings, whether residential or commercial, with the exception of places of worship, buildings less than 50 sq m, industrial sites, workshops and non-residential agricultural buildings that do not use a lot of energy, and temporary buildings.

The 'relevant person' will be the vendor or prospective landlord as appropriate; where a tenant wishes to assign or sub-let its interest and the premises have common heating or air-conditioning services, the landlord of those constituent parts becomes the 'relevant person'.

Local Authority Trading Standards Officers have powers to levy fines for non-compliance. EPCs are valid for 10 years from the date of production and can be reused as many times as required within that period, provided that changes have not occurred to the property relating to, for example, layout or refurbishment.

DECs (Display Energy Certificates) - Since 9 July 2015 public buildings in the UK over 250m² must display a Display Energy Certificate (DEC) prominently at all times. The aim of the Energy Performance of Buildings Directive is for the public to receive energy information about a building they are visiting. The Certificate provides information of a similar nature to an EPC but is an advisory document and thus not registered in the same way as an EPC.

Rental properties – when renting a property (including sub-letting and assignment, but excluding lease renewals, extensions or surrenders) to a new tenant, landlords are required to produce an EPC to the tenant and a tenant cannot legally move into the property until an EPC has been produced. Landlords are not required to produce an EPC to an existing tenant or if an existing lease is renewed or for dwellings in multiple occupation.

Properties for sale - sellers must obtain an EPC prior to marketing and provide a hard copy to the purchaser on completion.

Our valuations assume that EPCs would be provided on sale in accordance with the aforementioned legislation however we recommend that this is clarified by your legal advisors.

Tenure

Unless otherwise stated, we have not inspected any documents of title and for the purposes of this valuation we have assumed that the subject interest is unencumbered and free from any unduly onerous or unusual easements, restrictions, outgoings, covenants or rights of way and that it is not affected by any local authority proposals. We recommend that your solicitors be instructed to verify the position.

Tenant Status

Unless otherwise stated, we have assumed that there are no arrears of rent, service charge or other relevant payments, or undisclosed breaches of covenant.

Furthermore, unless otherwise confirmed herein, we have not made status enquiries of the tenant company/ies and have assumed that all financially sound and capable of meeting their rental and other responsibilities under the lease terms.

Disclosure of New Build Incentives

Following an agreement between the Council of Mortgage Lenders (CML), the Home Builders Federation (HBF) and Homes in Scotland, from 1 September 2008 the developer/builder or selling agent is required to complete a 'CML Disclosure of Incentives Form' for each sale of a newly built home, including newly converted property yet to be occupied for the first time. The form includes all details of the sale price and incentives included in the selling package, and is to be supplied to the Valuer on request.

Our valuation assumes that all appropriate and relevant information has been disclosed to us in full, including any incentives offered, or intended to be offered over the property.

Taxation and Grants

Value Added tax, taxation, grants and allowances, are not included in capital and rental values as, unless otherwise specified in the report, they are always stated on a basis exclusive of any VAT liability even though VAT will in certain cases be payable.

It is assumed for the purposes of valuation that any potential purchaser is able to reclaim VAT, unless otherwise stated. In particular it should be noted that where a valuation has been made on a Depreciated Replacement Cost basis the Replacement Cost adopted is net of VAT unless otherwise stated.

Unless otherwise specified Lambert Smith Hampton will not take into account of any existing or potential liabilities arising for capital gains or other taxation or tax reliefs as a result of grants or capital allowances, available to a purchaser of the property.

Market Value (MV)

We have prepared our valuation on the basis of **Market Value (MV)** which is defined in the RICS Valuation – Global Standards / UK supplement, as:

"The estimated amount for which an asset or liability should exchange on the *Valuation Date* between a willing buyer and a willing seller in an arm's-length transaction, after proper marketing and where the parties had each acted knowledgeably, prudently and without compulsion."

Fair Value

1. The estimated price for the transfer of an asset or liability between identified knowledge and willing parties that reflects the respective interests of those parties (IVS 2013).
2. The price that would be received to sell an asset, or paid to transfer a liability, in an orderly transaction between market participants at the measurement date (IFRS 13).

Depreciated Replacement Cost (DRC)

The current cost of replacing an asset with its modern equivalent asset less deductions for physical deterioration and all relevant forms of obsolescence and optimisation.

Operational Entities

The RICS advises that the most appropriate basis of valuation of properties normally sold as operational entities is Market Value as defined above. Such properties include public houses, hotels, holiday parks and other leisure uses, together with nursing homes, residential care homes, private hospital and petrol filling stations. Our valuations reflect the following:-

- a. The market's perception of trading potential with an assumed ability on the part of the purchaser to renew existing license, consents, registrations and permits;
- b. That the property is offered with vacant possession throughout, although in the case of nursing and residential care homes, subject to the contractual rights of the patients/residents occupying the home from time to time;
- c. That trade fixtures, fittings, furniture, furnishings and equipment are included.

Our valuations also specifically assume, unless otherwise specified that the business will continue to operate at a level not significantly worse than that indicated to us.

Existing Use Value

The estimated amount for which a property should exchange on the valuation date between a willing buyer and a willing seller in an arm's length transaction, after proper marketing wherein the parties had acted knowledgeably, prudently and without compulsion, assuming that the buyer is granted vacant possession of all parts of the property required by the business and disregarding potential alternative uses and any other characteristics of the property that would cause its Market Value to differ from that needed to replace the remaining service potential at least cost.

Market Rent

We have prepared an additional valuation on the basis of **Market Rent** (MR) which is defined in the RICS Valuation - Global Standards 2017 / UK supplement, as:

"The estimated amount for which an interest in *real property* should be leased on the *Valuation Date* between a willing lessor and willing lessee on appropriate lease terms in an arm's length transaction, after proper marketing and where the parties had each acted knowledgeably, prudently and without compulsion."

Further, no allowance is made for any costs of sale or any liability for taxation, including VAT, which may arise on disposal.

Insurance

Insurance is usually arranged by clients (or their brokers) based on reinstatement cost assessments or occasionally on an indemnity basis and other methods of valuation are not appropriate. Therefore, in situations where advice is provided for insurance purposes, our methodology will be on a Reinstatement Cost Assessment basis.

Compliance with Valuation Standards

Where applicable our valuations are in accordance with RICS Valuation – Global Standards / UK supplement, published by the Royal Institution of Chartered Surveyors ("RICS"), the Insurance Companies (Valuation of Assets) Regulations 1981, the Financial Conduct Authority (FCA) "Listing Rules" ("Source Book") and "City Code on Takeovers and Mergers" ("Blue Book") as amended and revised from time to time. Copies are available for inspection.

Total Valuation (Aggregation)

Where provided this is the aggregate of the value of each individual property. It is envisaged that properties would be marketed individually or in groups over an appropriate period of time. If all properties were to be sold as a single lot, the realisation would not necessarily be the same as the total of the valuations. This assumption is not applicable to valuations made for taxation purposes.

Limitations and Liabilities

This Valuation Report is provided for the stated purpose and for the sole use of the named client. It is confidential to the client and their professional advisors and the Valuer accepts no responsibility whatsoever to any other person.

Neither the whole nor any part of this Valuation Report nor any reference hereto may be included in any published document, circular, or statement, or published in any way, without the Valuer's written approval of the form and context in which it may appear.

Such publication of, or reference to this valuation report may not be made unless it contains a sufficient contemporaneous reference to the Special Assumptions or departure(s) from the RICS Valuation – Global Standards / UK supplement.

APPENDICES



APPENDIX 1: LETTER OF INSTRUCTION AND LSH TERMS OF ENGAGEMENT

21 November 2019

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THE COUNSELLORS

Planning Department
Ealing Council Offices
Perceval House
14-16 Uxbridge Road
Ealing
W5 2HL

Lambert Smith Hampton
United Kingdom House
180 Oxford Street
London W1D 1NN

For the attention of: [REDACTED]

Our Ref: LWVAL/00150601/JIM/28705

Dear Sirs

Client: Planning Department, London Borough of Ealing
Subject of Valuation: Gurnell Leisure Centre Site, Ruislip Road East, London W13 0AL
Planning Applicant: Ecoworld International

Thank you for your e-mail of 15th November 2019 setting out your requirements for us to provide technical and Financial Viability Assessment advice in respect of the above development proposal. We set out the basis of our instruction as follows:

1. You have instructed us to assess the financial viability of the development proposals for the property to assist in considering planning position in the context of the scheme put forward by the applicants.
2. You require us to assess the financial viability of the proposal on the five defined planning scenarios:
 - A. **Scenario A** – ‘The proposed Scheme without LBE contribution and grant funding’ – affordable provision at 34%, excluding £12.5 million Council contribution and £10.4 million GLA grant (already done).
 - B. **Scenario B** – ‘All private scheme without LBE contribution’– 100% market units, excluding £12.5 million Council contribution (already done).
 - C. **Scenario C** – ‘Policy compliant scheme (in affordable housing terms) without LBE contribution and grant funding’ – affordable housing provision at 50% (although not reflecting our preferred mix, but applying same split between LAR and intermediate as for the scenario A, i.e. 50/50), excluding £12.5 million Council contribution and £10.4 million GLA grant.
 - D. **Scenario D** – ‘The proposed Scheme with LBE contribution and grant funding’ – affordable provision at 34%, including £12.5 million Council contribution and £10.4 million GLA grant. This scenario is the truest reflection of what is being achieved in financial terms. Establish what profit is achieved (in absolute and percentage terms). Determine if this is reasonable.
 - E. **Scenario E** – ‘Smaller all private scheme with LBE contribution, optimised to achieve the same profit level as scenario D’ – 100% market units, including £12.5 million Council contribution. The starting point for this scenario is different as the profit level will be fixed to that achieved in scenario D assuming that is reasonable. The purpose of this scenario is to establish how many units (if all private) are needed to generate the same level of profit as under scenario D, in order to understand the impact of the inclusion of affordable housing in the proposal on the size and volume of development proposed on the site.
3. You require each viability assessment on the basis that vacant possession can be provided of the existing property and subject to the development proposals put forward by Ecoworld.

4. Where any Special Assumptions are needed made, these will be stated in our report and will be assumed to exist. A Special Assumption is one that either assumes facts that differ from the actual facts existing at the assessment date, or that would not be made by a typical market participant in a transaction on the assessment date.
5. We have agreed that we shall rely upon the following information for the purpose of reporting to you:
 - Plans of the proposed development prepared by Ecoworld International.
 - Various pre-application planning documents submitted by Ecoworld International.
 - Cost analysis of the developer's scheme prepared by your independent cost consultants
 - Planning policy guidance provided by your policy officers

We will assumed a that all material information will be fully disclosed to us and our assessments will be prepared on the basis that there is no further information available.
6. The Financial Viability Assessment calculations are required to allow you to consider the planning position relating to the planning application. Financial Viability Assessments are outside the exact scope of the Royal Institution of Chartered Surveyors' Valuation – Professional Standards (the "Red Book"), although where appropriate will follow the guidance set out therein, confirming "best practice".
7. The Financial Viability Assessment will be carried out by [REDACTED] [REDACTED] [REDACTED] a Director of LSH and RICS Registered Valuer who will be acting as an External Valuer. We confirm that he will act with independence, integrity and objectivity, and has sufficient current local and national knowledge of the particular asset type at its particular market as well as the skills, qualifications, experience and understanding necessary to undertake the valuation competently. He will sign the report on behalf of Lambert Smith Hampton.
8. As you are aware, the Real Estate Advisory team at LSH has been providing advice to the Council's DLO Building Partnership which has an interest in the Gurnell site and may partner the applicants. To avoid any potential conflict of interest, LSH will create an information barrier between the Real Estate Advisory team and the Valuation Consultancy team (the latter acting for the Planning Authority), with no information passed between the two.
9. Our advice to the planning department is entirely independent of any advice previously provided to other parts of the council and our fees are not contingent on any particular outcome being achieved. We confirm that over the last two years we have had no other involvement with the property, the applicants or developers, the occupying entity, or with any other party connected with proposals over the subject property. We therefore consider ourselves free of any conflict of interest in reporting to you.
10. So that our site inspection may be undertaken as safely as possible please provide us, by return, any information on known or potential hazards at the subject site as well as any existing requirements for safe access on site. For example, are you aware of whether any damaged or hazardous asbestos is present, whether there are any stability, structural, access to heights, lighting, gas or electrical safety issues? Are you aware of any equipment or substances on site which may create a risk?
11. Our agreed fee for providing you with our valuation report is fixed at £20,000, plus VAT and will be paid by London Borough of Ealing. We shall charge VAT, calculated with reference to the level prevailing at the date of our invoice on all fees.
12. We are committed to providing a high level of service. In the event that you have any concerns about any aspect of our work please do not hesitate to contact me. Details of our complaints procedure are available on request.
13. We confirm that the Valuation Division of Lambert Smith Hampton has a Quality Management System

encl. Terms of Engagement

Terms of Engagement for Valuation Services

1 INTERPRETATION

i) In these Terms:

"Agreement" means the agreement between the Client and LSH for carrying out the Service, incorporating the Terms and the Engagement Letter.

"Valuation Standards" means the RICS Valuation Professional Standards UK January 2014 (or later edition if superseded prior to the date of issue of the LSH Report) published by the RICS.

"Client" means the person to whom LSH is to provide services in accordance with the Terms and includes the person to whom the Engagement Letter is addressed.

"Director" means any person whose title includes the word 'director' whether or not a statutory director.

"Engagement Letter" means the letter or proposal document sent out by LSH to the Client setting out the basis on which it will carry out the Service.

"Expert Witness Terms" means the terms and conditions which, in addition to the Terms of Engagement letter, govern the provision of the Expert Witness Services (as defined within the Expert Witness Terms of Engagement).

"Force Majeure" means any circumstances beyond the reasonable control of LSH including, without limitation, war or threat of war, actual or threatened terrorist activity, any form of industrial action, disaster, adverse weather, act of God or act of governmental or other regulatory bodies.

"LSH" means Lambert Smith Hampton Group Limited whose registered office is at United Kingdom House, 180 Oxford Street, London W1D 1NN and any company which is in the same group of companies as that company.

"LSH Report" means the written advice and report(s) provided to the Client by LSH under this Agreement.

"Property" means the property identified in the Engagement Letter and any agreed variation to the Engagement Letter.

"RICS" means the Royal Institution of Chartered Surveyors.

"Service" means the service to be performed or procured by LSH under the Agreement including, where applicable, any Expert Witness Services (as defined in the Expert Witness Terms).

"Terms" means the terms and conditions set out in this document and includes the Expert Witness Terms and any other terms and conditions set out in the Engagement Letter or any other letter or document from LSH accompanying, supplementing or varying the Terms.

ii) In these Terms:

- (a) A reference to "writing" includes electronic mail;
- (b) A reference to any provision of a statute or regulation shall be construed as a reference to that provision as it is in force at the relevant time taking account of any amendment, re-enactment, extension or repeal.
- (c) Except where the context otherwise requires, words denoting the singular include the plural and vice versa, words denoting any gender include all genders and any reference to a "person" includes an individual, firm, corporation and/or other legal entity.
- (d) References to a numbered condition are to that condition in these Terms.
- (e) The headings are for convenience only and shall not affect the interpretation of these Terms.

2 GENERAL

- i) The Agreement shall be made when the Client receives a copy of the Terms or gives instructions to LSH, whichever shall be the later, and shall be subject to the Terms, which shall also apply to all or any part of the Service carried out prior to such date.
- ii) LSH shall perform all Services on the basis of the Terms only, which shall apply to the exclusion of any other terms and conditions which the Client may seek to impose.
- iii) No variation of the Terms or the Engagement Letter shall be binding unless previously agreed in writing by a Director of LSH and in entering into the Agreement the Client acknowledges that it has not relied on any statement, promise or representation which has not been confirmed in writing by a Director of LSH.
- iv) In the event of any ambiguity or conflict between any of the documents comprising the Agreement, the Engagement Letter shall take precedence over any of the other Terms.
- v) Nothing in the Agreement shall confer or purport to confer on any third party any benefit or right to enforce any terms of the Agreement. No term of the Agreement shall be enforceable under the Contracts (Rights of Third

Parties) Act 1999 by a person who is not a party to the Agreement, although this shall not affect any right or remedy of any third party which exists or is available other than under such Act.

- vi) LSH's duties under the Agreement shall be limited to those set out in the Terms.
- vii) LSH shall be entitled to accept and act on any instruction given to LSH by any person who is an employee of, or advisor, to the Client.
- viii) If any provision of the Terms shall become or be declared illegal, invalid or unenforceable for any reason such provision shall be divisible, and shall be deemed to be deleted, from the Terms.
- ix) Nothing in this condition 2 shall exclude or limit LSH's liability for fraud or fraudulent misrepresentation.
- x) The Client shall provide its authority, instructions or information required to LSH promptly.
- xi) It is a condition of the Client's agreement with LSH that (save where LSH instructs independent experts, consultants or other third parties on the Client's behalf) the duties and responsibilities owed to the Client are solely and exclusively those of LSH and that no employee of LSH shall owe the Client any personal duty of care or be liable to the Client for any loss or damage howsoever arising as a consequence of the acts or omissions of such employee (including negligent acts or omissions) save and to the extent that such loss or damage is caused by the fraud, dishonesty, wilful misconduct or unauthorised conduct on the part of such employee.

3 SERVICE

LSH shall seek to provide a service such as would be expected of a national firm of consultant surveyors in a proper professional manner and shall perform the Service with reasonable care and skill.

The Service shall, however, be provided on the basis that:

- i) LSH reserves the right to carry out instructions in accordance with such procedures, principles or methodologies as LSH deems to be appropriate. Where appropriate, LSH shall comply with the relevant Practice Statements and Guidance Notes published by the RICS and measurements shall be undertaken in accordance with the relevant Code of Measuring Practice published by the RICS.
- ii) estimates of times for performance of all or any part of the Service have been made upon the basis of information available to LSH at the time and are approximate only so that LSH shall not be bound by any such estimate.
- iii) LSH may, if it considers it appropriate, secure performance of any or all Services by instructing one or more other persons (whether as sub-contractor or in any other capacity) upon such terms as LSH considers appropriate. In circumstances where LSH secures the performance of another person, no additional fee shall be payable by the Client in the absence of prior agreement to such additional fee but the Client shall be liable to pay all fees and other sums payable to LSH as if all Services had been performed by LSH.
- iv) The Client shall provide LSH (or ensure that LSH is provided) with details of any other consultants or contractors appointed or to be appointed by the Client relevant to the Service.
- v) If LSH are instructed to act as an Independent Valuer then the meaning and understanding of the term Independent Valuer shall be that LSH will exercise independence, integrity and objectivity when undertaking the Service in accordance with the Valuation Standards but LSH shall not be under any obligation to conform to any statutory or regulatory description given to the term Independent Valuer or the Client's definition or understanding of Independent Valuer unless LSH agrees with the client in writing prior to the instruction that any such other meaning shall apply.

4 THE PROPERTY

i) Information

The Client warrants, represents and undertakes to LSH that (save as specifically notified to LSH by the Client in writing):

- (a) LSH shall be entitled to rely upon information and documents provided by or on behalf of the Client including those relating to matters such as Health & Safety, the Asbestos Register and details of tenure, tenancies, use, contamination, building costs, costs of development, town planning consents and building regulation consents, historic or projected future trading accounts and the like as being, to the best of the Client's knowledge, information and belief, accurate and not misleading (either on their face or by inference or omission) and the Client shall advise LSH and shall instruct any advisor to inform LSH in the event that the Client and/or any advisor receives notice or becomes in any other way aware that any information given to LSH is or may be misleading or inaccurate.
- (b) It shall provide legible true copies of any relevant documents reasonably required by LSH.
- (c) It shall make arrangements for the inspection of or attendance at the Property by LSH on reasonable notice in order to carry out the Service.
- (d) If the Client instructs LSH to re-value the Property without inspection LSH will assume that no material changes to the physical attributes of

the Property and the area in which it is situated have occurred and the Client has provided information of changes in rental income from investment properties and any other material changes to the non-physical attributes of each property such as lease terms, planning consents, statutory notices etc.

- (e) if the Client instructs LSH to undertake a critical review of a valuation prepared by another valuer and if LSH agrees in writing to do so then the Client shall undertake to provide LSH with full details of the first valuer's instructions so that LSH is in possession of all of the facts and information including the terms of instruction, circumstances and reasons for the first instruction so that LSH are able to undertake a critical review and the Client shall not publicise, discuss with third parties or refer to any critical review carried out by LSH in any documents or circular or otherwise without the express authority from LSH in writing.

ii) Assumptions

Except where disclosed to LSH in writing, LSH shall be entitled to assume the following as appropriate:

- (a) Opinions of value shall be provided on the basis of "Market Value" or "Market Rent" as defined in the Practice Statements and Guidance Notes published by the RICS and in accordance with the Valuation Standards unless otherwise agreed in writing between LSH and the Client and, unless specifically notified by the Client to LSH and agreed in writing by LSH, LSH shall not be under any obligation to identify or take into account any marketing constraint such as if the Property cannot be freely or adequately exposed to the market or if the Property is subject to an inherent defect or constraint whether or not such circumstance or constraint is actual, anticipated or hypothetical and LSH shall not be required to take into account any time limit for disposal without adequate explanation from the client of the reasons for such a constraint.
- (b) There are no tenant's improvements which would materially affect LSH's opinion of the value of the Property unless otherwise advised. LSH shall not take account of any item in the nature of the tenant's fixtures and fittings, improvements, plant equipment, and machinery and LSH may (without any obligation to do so) make any reasonable assumptions to identify if any fixtures and fittings are part of the Property and which would pass, with the Property, on reversion, back to the landlord or on any sale and that all such tenant's improvements or fixtures and fittings have all necessary consents and are not subject to any onerous conditions.
- (c) There are no restrictive covenants or encumbrances or unduly onerous or unusual easements, covenants, restrictions, outgoing or conditions attaching to the Property or unusual terms in any relevant documentation or notices or procedures (including compulsory purchase orders) served, issued or threatened or any other matters whatsoever full information about which have not been supplied and brought to LSH's attention in writing and which would materially affect LSH's opinion of the value of the Property and that the Property has good marketable title.
- (d) The Property has the benefit of full planning consent or established use rights and building regulations approval.
- (e) The Property is not contaminated or potentially contaminated and, unless specifically instructed, LSH shall not undertake any investigation into the past or present uses of either the Property or any adjoining or nearby land, to establish whether there is any potential for contamination from these uses and shall assume that none exists.
- (f) LSH may rely on all data provided to it, or stated on any publicly available websites, in respect of any EPC affecting the property. LSH shall be under no obligation to establish if any EPC is accurate or current. In the event that no EPC is available LSH shall assume that the Property meets the minimum requirements of the legislation and that there will be no adverse impact on value and marketability.
- (g) The Property (including, without limitation, all means of access and egress, which shall be assumed to be freely available, to and from the same and all plant and/or machinery or substances located in or at the Property and provided for the use of any person) has been properly maintained and is in good repair and condition and that any obligation concerning repair, maintenance, decoration or reinstatement have been complied with in accordance with all and any necessary statutory or other regulations and requirements and, without prejudice to the generality of the foregoing, is safe and without risks to health. LSH may at its discretion reflect any readily apparent defects or items of disrepair noted during its inspection in valuations but the Client shall not rely on this to assume either that the Property is free from defect or that LSH have in any way quantified the extent of any repair;
- (h) The Property complies with all relevant statutory requirements including Fire Regulations.
- (i) LSH's valuations shall reflect the state reached in construction and the company's costs at the date of valuation, having regard to the obligations of parties involved in the development only to the extent that any costs or estimates which have been prepared by the Client's

professional advisors are made available to LSH and LSH shall not be liable for any error or inaccuracy arising directly or indirectly from such information and shall not be under any duty to advise concerning the accuracy or relevance of such information:

- (1) Except where specifically stated otherwise, LSH shall assume that the Property is subject to normal outgoing and that where relevant any tenant(s) are responsible for repairs, the cost of insurance and payment of rates and other usual outgoing, either directly or by means of service charge provisions.
- (2) Unless specifically requested, LSH shall not make enquiries as to the financial standing of actual or prospective tenants although LSH shall reflect the general market's perception of a tenant's status in its valuation. LSH shall assume, unless advised in writing, that tenants are capable of meeting their financial obligations under the lease terms and that there are no arrears of rent, service charge or other relevant payments or undisclosed breaches of covenants.
- (3) In the valuation of portfolios LSH shall value each Property separately and not as part of the portfolio. Accordingly, LSH shall make no allowance, either positive or negative, in the aggregate value reported to reflect the possibility of the whole of the portfolio being put on the market at any one time.
- (4) LSH shall be entitled to make such special assumptions ("Special Assumptions") as are necessary to provide the Client with the opinions of value requested by the Client. Any Special Assumptions made shall be agreed with the Client and set out in the Engagement Letter and shall be stated in the valuation report prepared by LSH.

iii) Other matters

Unless otherwise stated in the Engagement Letter:

- (a) LSH shall not be responsible for making any local search or other enquiries of local or any other authorities, including town planning enquiries or investigation of title regarding the Property, which shall be the Client's sole responsibility, and LSH may rely on any such information provided by the Client or the Client's advisors without further enquiry. If LSH shall make oral or other enquiries regarding the Property to third parties, the results of such enquiries shall not be relied on by the Client.
- (b) Subject to agreement of the terms of any subsequent instruction, LSH shall not be responsible for making any structural or site survey or audit of the Property such as may be required under the Equality Act 2010 or Control of Asbestos Regulations 2012 or for testing any services to or on the Property, including the availability of broadband or other communications or information technology infrastructures.
- (c) Any advice, approval or representation made by LSH or any person on behalf of LSH regarding the legal meaning or effect of any lease or contract shall not be relied on by the Client and such advice shall be limited to matters upon which it is suitable for a Chartered Surveyor to advise and shall not constitute advice regarding legal interpretation or drafting issues. Unless otherwise agreed in writing between the Client and LSH, LSH shall not be obliged to advise upon the interpretation or drafting of any draft agreements, leases or other legal or technical documents.
- (d) LSH shall not be responsible for advising in respect of, or effecting the service of, any notice required to be given under statute or under the provisions of any contract or lease or otherwise and shall not be liable for advice, interpretation or compliance with any time periods or other provisions under statute, regulation (including the Civil Procedure Rules for the time being) or provided for in any contract or lease including any notice of appeal or for making payments or carrying out any other actions in accordance with such time periods.
- (e) There are no facts known to the Client which ought to be brought to the attention of LSH to enable it to ensure that access to the Property by any person is safe and without risks to health.
- (f) LSH shall exclude and shall not be required to take into account any work in progress stock in trade and shall not be required to take into account or be responsible for the interpretation of accounts, turnover figures or other financial or information relating to trade.
- (g) No allowance shall be made for any liability for payment of Corporation Tax, Capital Gains Tax, Stamp Duty Land Tax or any other property related tax whether existing or which may arise on development or disposal, deemed or otherwise. Valuations shall be deemed to be exclusive of Value Added Tax.
- (h) LSH shall not be under any duty to carry out conflict checks in relation to any third party (such as related companies) other than the Client or any other relevant party notified in writing by the Client to LSH.
- (i) Valuations shall not reflect any element of marriage value or special purchaser value which could possibly be realised by a merger of interests or by sale to an owner or occupier of an adjoining property, other than in so far as this would be reflected in offers made in the open market by prospective purchasers other than the purchaser with a

special interest unless LSH shall make a Special Assumption in this regard.

- (j) All valuations are given without adjustment for capital based government grants received, or potentially receivable, at the date of valuation or at some future date.
- (k) LSH's valuations shall be reported in pounds GBP. Overseas properties shall be reported in the appropriate local currency and represent LSH's opinion of the realisable value in the country of origin computed in accordance with local practice, with no allowance made for the transfer of funds in the UK.
- (l) Unless the Client shall specifically commission a formal survey with relevant obligations and LSH accept such instruction on terms to be agreed, LSH shall not be under any obligation to take into account any aspect arising from the condition of the Property including any benefit or liability in respect of dilapidations and no advice or representation concerning the condition of the Property shall be relied on by the Client or any third party.
- (m) Unless the Client shall specifically commission a formal management arrangement with relevant obligations and LSH accept such instruction on terms to be agreed, the Client shall remain responsible for the insurance of the Property and for notifying its insurers should the Property become vacant. LSH shall not be responsible for the management, security or deterioration of the Property or, except in respect of death or personal injury caused by the negligence of LSH or its employees or agents, for any other like matter or loss however caused. If the keys for the Property are held by LSH then the Client shall be deemed to have given authority to LSH to supply keys to any persons who wish to inspect the Property or carry out works or inspections at the Property and LSH shall accept no responsibility for the action of such persons. The Client shall effect and maintain full insurance cover against any claim that may be made by LSH or any representative or employee of LSH or by any third party in respect of any loss, damage or injury however caused arising directly or indirectly under or in respect of the Agreement.
- (n) whilst LSH shall endeavour to treat all information which is relevant to the Client's instruction as confidential, LSH may at its sole discretion provide any information to other professionals or third parties as is usual practice and, in any event, LSH may be required to provide such information to a court or tribunal or to the other party in any proceedings.
- (o) LSH shall not be under any obligation to arrange for any investigations to be carried out to determine whether or not any deleterious or hazardous materials have been used in construction of the buildings or have since been incorporated and LSH shall not therefore, be in a position to report that the Property is free from risk in this respect. Unless LSH are advised by the Client in writing, and subject to LSH's sole discretion, LSH's valuations shall be made on the assumption that such investigations would not disclose the presence of any such materials to any significant extent but this shall not be relied on by the Client as any indication that the Property is free from risk.
- (p) LSH shall not be under any obligation to carry out or commission a site investigation or geographical or geophysical survey in order to determine the suitability of ground conditions and services, nor shall LSH undertake archaeological, ecological or environmental surveys. Unless otherwise advised LSH assume, but can give no assurances, that the ground has sufficient load bearing strength for the existing structures or any structures proposed or considered. Where development is contemplated, LSH assume that no extraordinary expenses or delays will be incurred during the construction period, due to any adverse ground conditions or archaeological matters.

5 TERMS OF PAYMENT

- i) Unless otherwise stated in the Engagement Letter the Client shall be liable to pay LSH its remuneration or a due proportion of its remuneration at intervals to be determined by LSH or in the absence of such determination on completion of the Service at LSH's discretion. Payments are due on issue of the invoice and the final dates for payment by the Client shall be 30 days' from the date of issue of the invoice.
- ii) LSH shall be entitled to submit accounts for expenses at the time when incurred or ordered by LSH and such accounts shall be payable by the Client whether or not the Client withdraws its instructions. Accounts for expenses are due for settlement on presentation. Alternatively LSH may arrange for the suppliers to invoice the Client directly for services supplied.
- iii) VAT will be payable where applicable at the prevailing rate on all fees and expenses.
- iv) LSH reserves the right to charge the Client interest (both before and after any judgement) on any unpaid invoice at the rate of 3% per annum above the base lending rate of the Bank of Scotland calculated on a daily basis from 30 days after the date of its invoice up to and including the date of settlement in full.
- v) If any sum due to LSH from the Client remains unpaid for more than 30 days after the date of the invoice LSH shall be entitled to suspend all further

work for the Client until the outstanding sum is paid to LSH in full. In these circumstances LSH shall not be liable for any delays, losses or expenses resulting from such suspension.

- vi) The Client shall not withhold any payment after the final date for payment of any sum due unless notice is provided to LSH in writing by the Client not less than seven days before the final date specifying the amounts to be withheld and the reasonable grounds for withholding payment or if there is more than one ground, each ground and the amount attributable to it.
- vii) Where there are two or more clients in the case of a joint or multiple instruction by multiple parties invoices for an appropriate share of any fees or expenses as determined in LSH's sole discretion shall be issued to all or any client simultaneously or otherwise and each client shall be jointly and severally liable for the full amount of LSH's fees or expenses in the event that payment is not received from one or more clients.

6 FEES AND EXPENSES

- i) Fees shall be charged at the rate set out in the Engagement Letter or as otherwise agreed in writing between LSH and the Client. In the event of a change in the scope of the Service or LSH being required to carry out additional Services, LSH reserves the right to charge an additional fee.
- ii) In addition to the fees referred to in Condition 7i) the Client shall be responsible for all fees and expenses incurred or ordered in respect of the Property, which may include without limitation advertising, brochure production, printing of particulars, photography, mailing, digital marketing expenses, administration, Anti-Money Laundering checks, on site representation, sign boards, travelling, mileage, messenger delivery and copying of documents and plans. Expenses shall be passed on to the Client at gross cost unless otherwise stated in the Engagement Letter. LSH shall be entitled to retain any discounts or commissions which are available or paid to LSH in order to offset administrative expenses. A copy of LSH's fee rates where applicable shall be made available upon request, such rates being subject to amendment from time to time by LSH on written notice.
- iii) If, in connection with the service, the resolution of a dispute with a third party is referred to an adjudicator, arbitrator, expert, mediator, court or tribunal, all costs in connection with such referral shall be the sole liability of the Client and shall either be paid directly by the Client or be recharged to the Client as an expense and the Client shall indemnify LSH in respect of any liability or loss in such matters.
- iv) Unless specifically provided for in the Terms or accompanying letter or as otherwise agreed in writing between LSH and the Client the fees do not include remuneration for acting as an expert witness for which service a separate fee shall be required.

7 INTELLECTUAL PROPERTY

- i) Ownership in any information, documents or other material provided by the Client to LSH in relation to the Property or Services shall remain the property of the Client ('Client Material') and LSH is granted a perpetual royalty free licence to use, copy, adapt and modify such Client Material for the purposes of performing the Services and for the purposes of advertising or promoting LSH and its business.
- ii) Ownership of all materials, know-how, developments, reports, forecasts, drawings, accounts and other documents originated by LSH in relation to or arising out of the Service shall belong to LSH.
- iii) LSH shall grant the Client a perpetual royalty free licence to use the LSH Report. The Client may not use the whole, or any part of the LSH Report, or any reference to it in any published document, circular or statement, without LSH's written approval of the form and context in which it shall appear. Such approval is required whether or not LSH is referred to by name and whether or not the reports are combined with others.
- iv) If at any time the Client is in default of payment of fees or other amounts properly due under this Agreement, LSH may suspend the Client's licence to the LSH Report. At LSH's discretion, the licence may be resumed on receipt of all outstanding amounts.

8 INDEMNITY

The Client shall indemnify and keep indemnified LSH from and against all and any liability, losses, damages, penalties, fines, costs and expenses (including legal costs and expenses) suffered or incurred by LSH arising out of or by virtue of:

- i) The breach by the Client of any of its obligations under the Terms, or;
- ii) The Client's instructions to LSH other than any losses, damages, costs and expenses arising by virtue of the wilful default of LSH or its employees or agents.

9 LIMITATION AND LIABILITY

- i) Except where LSH has entered into a specific agreement with a third party, the LSH Report is provided solely for the purpose of the Service and to the Client. Should the Client disclose any part of the LSH Report to any third party the Client shall notify such third party in advance of the disclosure and in writing that LSH does not owe a duty of care to such third party. The Client shall indemnify LSH and hold LSH harmless against all liabilities,

costs, expenses, damages and losses suffered or incurred by LSH arising out of or in connection with such disclosure by the Client.

- ii) In the event of a proposal to place any loan secured over the Property in a syndicate, the Client must (i) notify LSH of such proposal, ii) disclose the identity of the parties participating in the syndicate to LSH, and iii) obtain LSH's written consent (which may be subject to the inclusion of alternative or additional terms) for such parties to rely on any of LSH's valuations, reports and any other advice or information resulting from the Client's instruction.
- iii) Nothing in this Agreement shall limit LSH's liability for death and/or personal injury caused by LSH.
- iv) Subject to clause 9iii) above, the aggregate liability of LSH to the Client whether arising from negligence, tort, breach of contract or other obligation or duty or otherwise shall be limited to five million pounds sterling (£5,000,000.00).
- v) Subject to clause 9iii) above, LSH shall not be liable for any claim to the extent that such claim is or can be characterised as a claim for (or arising from):
 - (a) Loss of revenue or profits;
 - (b) Loss of business opportunity or loss of contracts;
 - (c) Loss of goodwill or injury to reputation;
 - (d) Indirect, consequential or special loss or damage; or
 - (e) Anticipated savings.
- vi) All risks and/or liabilities in relation to toxic mould, deleterious materials, contamination, radon gas, HAC or calcium chloride shall remain with the Client and the Client shall take such steps as it deems necessary to insure against or otherwise address such risks and liabilities.
- vii) LSH is not qualified to and will not provide any advice or services in connection with asbestos. The Client acknowledges that all risks relating to asbestos howsoever arising remain with the Client who shall take such steps as it deems necessary to address such risks. If appropriate the Client will arrange for the appointment by the Client of specialist asbestos consultants.
- viii) In the event of the Client engaging LSH together with other advisers, service providers and/or suppliers engaged by the Client or any other third party in relation to the Property, LSH's liability shall, in addition to the limitations contained in this clause 9 above, be limited to that proportion of any loss or damage suffered by the Client as it would be just and equitable for LSH to bear having regard to LSH's responsibility for it and on the basis that all other advisers, service providers and/or suppliers shall be deemed to have paid such proportion of the relevant loss or damage suffered by the Client which is just and equitable for them to have paid having regard to the extent of their respective responsibilities.
- ix) LSH will not advise on capital allowances in performance of the Services and will not be liable for any liability, losses, damages, penalties, fines, costs and expenses suffered or incurred by the Client or any other Third Party in respect of capital allowances. Insofar as LSH are liable for any capital allowances incurred as a result of the performance of the Services the indemnity set out in clause 8 shall apply.

10 REINSTATEMENT COST ESTIMATES

In the event that the Client requires an estimate of the cost of reinstating any building or structure, for insurance purposes the following terms shall apply:

- i) The Reinstatement Cost assessment is an estimate provided on an informal basis only and should not be relied upon for the purposes of placing insurance cover on the property. Should a Reinstatement Cost Assessment be required to enable an insurance policy to be placed, LSH Building Consultancy Division must be separately instructed to undertake such an assessment.
- ii) The Reinstatement Cost assessed for insurance purposes shall be a "Day One" valuation and shall not include an allowance for inflation and/or design/procurement periods etc.
- iii) LSH shall assume that the policy is on an indemnity basis with a fully operative reinstatement clause, no special conditions, an instantaneous basis of value and shall have no regard to any variation in building costs subsequent to the date of LSH's informal assessment. LSH's assessment will be based on the assumption that the reconstruction of any premises, to provide similar or new accommodation, will be permitted by the appropriate authorities with no undue restrictions.
- iv) LSH will exclude tenant fit-out and/or fixtures and fittings, Value Added Tax, loss of rent, extra costs of working or other consequential losses, local authority requirements and party wall works. Further, LSH's assessment shall exclude any land remediation and special contaminated waste costs. However, the figure will be inclusive of professional fees, demolition and site clearance.
- v) LSH shall assume that VAT is chargeable on professional fees and building works to new and existing premises.
- vi) LSH will not carry out a structural survey and LSH's assessment will be prepared on the assumption that ground conditions will not give rise to the

need for any specialist or unduly expensive constructional techniques (specialist foundations etc) unless LSH is otherwise advised by the Client. In addition, the removal of hazardous materials, if any, shall be excluded from the informal assessment.

11 TERMINATION OF INSTRUCTIONS

- i) The instruction from the Client to LSH may be terminated by the Client by giving not less than 30 days' notice to LSH in writing to LSH whereupon LSH shall be entitled to charge (at LSH's option):
 - (a) A fair and reasonable proportion of the full fee which would have been payable if the work had been carried through to a conclusion and as if LSH had become entitled to payment in accordance with conditions 5 and 6 above, or
 - (b) A reasonable sum for all the work undertaken up to and including the date of termination based on quantum meruit; or
 - (c) The fee as LSH are entitled to under conditions 5 and 6 together in each case with any expenses already incurred.
- ii) The instruction from the Client to LSH may be terminated by LSH on the following terms by giving not less than 30 days' notice in writing:
 - (a) If, as a result of circumstances outside the control of both parties, it becomes impossible to perform the Services within a reasonable period. In these circumstances the Client shall pay to LSH a fee for all work which has been done up to and including the date of termination on a quantum meruit basis; or
 - (b) If the Client has made it impossible to complete the instruction within a reasonable period or has not made payment by the due date of any sum payable by the Client to LSH. In these circumstances the Client shall pay to LSH the full fee which would have been charged as if the work had been carried through to a conclusion (plus any expenses already incurred); or
 - (c) The fee as LSH are entitled to under conditions 5 and 6 together in each case with any expenses already incurred.
- iii) Any outstanding fees and expenses due to LSH shall be paid in full by the Client on or before the expiry of the notice period for termination of instructions. For the avoidance of doubt in the event of termination of instructions, whether by LSH or by the Client, LSH shall not be liable to repay the Client any fees and expenses previously paid by the Client to LSH.
- iv) Where any fees are to be charged on a quantum meruit basis such fees shall be calculated by reference to LSH's hourly charges from time to time, details of which are available from LSH on request.
- v) Notwithstanding the provisions of clauses i) and ii) above LSH shall be entitled to terminate an instruction from a client without notice if required to do so for statutory or regulatory reasons.

12 COMPLAINTS

- i) LSH aims to carry out any instructions received from the Client in an efficient and professional manner. LSH, therefore, hopes that the Client will not find cause for complaint but recognises that in an isolated circumstance there may be complaints. These should be addressed initially to the Head of LSH office dealing with the instruction.
- ii) LSH adopts the complaints handling procedures that are required by the RICS, a copy of which is available from LSH on request.

13 ASSIGNMENT

- i) LSH may assign the Agreement without the consent of the Client.
- ii) The Agreement is not assignable by the Client without the prior written consent of LSH.

14 DATA PROTECTION

- i) We collect and process your personal information. All information will be processed in accordance with the applicable data protection laws in the United Kingdom including the laws and regulations of the European Union such as the General Data Protection Regulation (GDPR), the European Economic Area and their member states, applicable to the processing of Personal Data and the interception of communications in place from time to time (**Data Protection Laws**).
- ii) Full details of how we process your information can be found on our website <http://www.lsh.co.uk/privacy-policy>. Printed copies of our privacy notice are available on request.
- i) You may change your communication preferences or withdraw from any further communications from us by contacting us at privacy@lsh.co.uk
- ii) Where we receive personal data from any prospective purchaser or tenant of the Property, we shall only use that data for the purposes of your instructions and shall comply with Data Protection Laws.

15 MONEY LAUNDERING REGULATIONS

i) Client identification

As with other professional service firms, LSH is under stringent requirements to identify its clients for the purposes of the anti-money

laundering legislation. LSH is likely to request from you, and retain, some information and documentation for these purposes and/or to make searches of appropriate databases. If satisfactory evidence of your identity is not provided within a reasonable time, there may be circumstances in which LSH is not able to proceed with the required services.

ii) Money laundering reporting

- (a) Much of LSH's work falls into the regulated sector under the Proceeds of Crime Act 2002 and, as such, we are required to report all knowledge or suspicion (or reasonable grounds for knowledge or suspicion) that a criminal offence giving rise to any direct or indirect benefit from criminal conduct has been committed. Failure to report such knowledge or suspicion would be a criminal offence. This duty to report exists regardless of whether the suspected offence has been, or is about to be, committed by a client or by a third party.
- (b) If as part of our normal work LSH obtain knowledge or suspicion (or reasonable grounds for knowledge or suspicion) that such offences have been committed we are required to make a report to the National Crime Agency. It is not our practice to discuss the existence or otherwise of any reports with you or with anyone else, because of the restrictions imposed on us by the tipping off provisions of the anti-money laundering legislation.
- (c) LSH shall not be liable for any liabilities of the Client or third parties arising out of its regulatory obligations to report.

16 BRIBERY ACT 2010

We undertake that we will not engage in any activity, practice or conduct which would constitute an offence under the Bribery Act 2010, and that we have, and will maintain in place, adequate procedures designed to prevent any Associated Person (as defined in the Bribery Act 2010) from undertaking any conduct that would give rise to an offence under the Bribery Act 2010.

17 GOVERNING LAW AND JURISDICTION

The Terms, and the Agreement of which they form part, shall be governed by and construed in all respects in accordance with English Law and the parties irrevocably and unconditionally submit to the exclusive jurisdiction of the English Courts in relation to any dispute or proceedings arising out of, or in connection with, the Terms or any such Agreement but without prejudice to LSH's right to take proceedings in any other jurisdiction in order to enforce payment of any sums owed to LSH.

8 July 2019

APPENDIX 2: FINANCIAL VIABILITY ASSESSMENT (LSH) – BASE SCENARIO

Gurnell Development Proposals
LSH Base Scenario
Financial Viability Analysis

Gurnell Leisure Centre
Ruislip Road East
Ealing
London
W13 0AL

Development Appraisal
Prepared by LSH
Lambert Smith Hampton
20 August 2020

APPRAISAL SUMMARY**LAMBERT SMITH HAMPTON**

Gurnell Development Proposals
LSH Base Scenario
Financial Viability Analysis

Summary Appraisal for Merged Phases 1 2

Currency in £

REVENUE

Sales Valuation	Units	ft²	Rate ft²	Unit Price	Gross Sales
Blocks C&D Private Residential	1	172,212	656.00	112,971,072	112,971,072
Blocks E&F Private Residential	1	92,300	656.00	60,548,800	60,548,800
Car parking	1	0	0.00	2,200,000	2,200,000
Block A London Affordable Rent	1	70,826	252.83	17,907,167	17,907,167
Block B Shared Ownership	<u>1</u>	<u>60,612</u>	474.38	28,752,833	<u>28,752,833</u>
Totals	5	395,950			222,379,872

Rental Area Summary

	Units	ft²	Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV
Commercial	1	5,167	14.00	72,338	72,338	72,338

Investment Valuation

Commercial						
Market Rent	72,338	YP @	6.5000%	15.3846		
		PV 1yr 6mths @	6.5000%	0.9099	1,012,579	

GROSS DEVELOPMENT VALUE**223,392,451****NET REALISATION****223,392,451****OUTLAY****ACQUISITION COSTS**

Agent Fee	40,000	
Legal Fee	30,000	
	70,000	

CONSTRUCTION COSTS

Construction	ft²	Rate ft²	Cost
Commercial	5,167 ft²	190.00 pf²	981,730
Blocks C&D Private Residential	228,959 ft²	259.00 pf²	59,300,381
Blocks E&F Private Residential	124,775 ft²	259.00 pf²	32,316,725
Leisure Centre	84,992 ft²	340.00 pf²	28,897,280
Block A London Affordable Rent	95,476 ft²	240.00 pf²	22,914,240

This appraisal report does not constitute a formal valuation.

APPRAISAL SUMMARY**LAMBERT SMITH HAMPTON****Gurnell Development Proposals****LSH Base Scenario****Financial Viability Analysis**

Block B Shared Ownership	83,000 ft²	240.00 pf²	19,920,103	
Basement & Other	<u>133,472 ft²</u>	190.00 pf²	<u>25,359,680</u>	
Totals	755,841 ft²		189,690,139	189,690,139
Contingency		5.00%	9,484,507	
MCIL			2,500,000	
Borough S106			4,750,000	
				16,734,507
PROFESSIONAL FEES				
Professionals		10.00%	18,969,014	
				18,969,014
MARKETING & LETTING				
Marketing		1.00%	1,735,199	
Letting Agent Fee		10.00%	7,234	
Letting Legal Fee		5.00%	3,617	
				1,746,049
DISPOSAL FEES				
Sales Agent Fee		1.50%	2,602,798	
Sales Legal Fee		0.25%	433,800	
				3,036,598
FINANCE				
Debit Rate 6.000%, Credit Rate 0.500% (Nominal)				
Total Finance Cost				21,052,521
TOTAL COSTS				251,298,829
PROFIT				(27,906,378)
Performance Measures				
Profit on Cost%		(11.10)%		
Profit on GDV%		(12.49)%		
Profit on NDV%		(12.49)%		
Development Yield% (on Rent)		0.03%		
Equivalent Yield% (Nominal)		6.50%		
Equivalent Yield% (True)		6.77%		
IRR		(2.21)%		

This appraisal report does not constitute a formal valuation.

APPRAISAL SUMMARY

LAMBERT SMITH HAMPTON

Gurnell Development Proposals

LSH Base Scenario

Financial Viability Analysis

Rent Cover	-385 yrs -9 mths
Profit Erosion (finance rate 6.000%)	N/A

This appraisal report does not constitute a formal valuation.

APPENDIX 3: OTHER FINANCIAL VIABILITY ASSESSMENTS (LSH) –
SCENARIOS 1 - 5

Gurnell Development Proposals
LSH Scenario 1
Financial Viability Analysis

Gurnell Leisure Centre
Ruislip Road East
Ealing
London
W13 0AL

Development Appraisal
Prepared by LSH
Lambert Smith Hampton
20 August 2020

CONCISE APPRAISAL SUMMARY**LAMBERT SMITH HAMPTON****Gurnell Development Proposals
LSH Scenario 1
Financial Viability Analysis****Condensed Summary Appraisal for Merged Phases 1 2****Currency in £****INCOME**

Sales Valuation		234,923,872
Annual Rental Income	72,338	
Net Capital Value		1,012,579
Other Income		12,500,000

Net Realisation **248,436,451****OUTLAY****Acquisition**

Site Purchase Fees	70,000	
Total Purchase Cost		70,000

Construction

Construction Costs	205,923,725	
Professional Fees	18,969,014	
Total Construction		224,892,739

Marketing/Letting

Marketing		1,735,199
Letting		10,851

Disposal

Sales Costs		3,036,598
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Finance

Project Length	76 months	
Debit Rate 6.000%, Credit Rate 0.500% (Nominal)		
Total Finance		13,566,349

Total Expenditure **243,311,735****Profit****5,124,716****Performance Measures****This appraisal report does not constitute a formal valuation.**

CONCISE APPRAISAL SUMMARY

LAMBERT SMITH HAMPTON

Gurnell Development Proposals

LSH Scenario 1

Financial Viability Analysis

Profit on Cost%	2.11%
Profit on GDV%	2.17%
Profit on NDV%	2.17%
Development Yield% (on Rent)	0.03%
Equivalent Yield% (Nominal)	6.50%
Equivalent Yield% (True)	6.77%
IRR	7.60%
Rent Cover	70 yrs 10 mths
Profit Erosion (finance rate 6.000%)	0 yrs 4 mths

This appraisal report does not constitute a formal valuation.

Gurnell Leisure Centre
LSH Scenario 2
Financial Viability Analysis

Gurnell Leisure Centre
Ruislip Road East
Ealing
London
W13 0AL

Development Appraisal
Prepared by LSH
Lambert Smith Hampton
21 August 2020

APPRAISAL SUMMARY**LAMBERT SMITH HAMPTON**

Gurnell Leisure Centre
LSH Scenario 2
Financial Viability Analysis

Summary Appraisal for Merged Phases 1 2

Currency in £

REVENUE**Sales Valuation**

	Units	ft²	Rate ft²	Unit Price	Gross Sales
Blocks C&D Private Residential	1	296,105	656.00	194,244,880	194,244,880
Blocks E&F Private Residential	1	158,756	656.00	104,143,936	104,143,936
Car parking	1	0	0.00	1,600,000	1,600,000
Block A London Affordable Rent	1	245,158	391.20	95,905,810	95,905,810
Block B Shared Ownership	<u>1</u>	<u>209,803</u>	519.65	109,024,129	<u>109,024,129</u>
Totals	5	909,822			504,918,755

Rental Area Summary

	Units	ft²	Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV
Commercial	1	5,167	14.00	72,338	72,338	72,338

Investment Valuation**Commercial**

Market Rent	72,338	YP @	6.5000%	15.3846		
		PV 1yr 6mths @	6.5000%	0.9099	1,012,579	

GROSS DEVELOPMENT VALUE**505,931,333****Additional Revenue**

LBE Funding			12,500,000			
				12,500,000		

NET REALISATION**518,431,333****OUTLAY****ACQUISITION COSTS**

Agent Fee			40,000			
Legal Fee			30,000			
				70,000		

CONSTRUCTION COSTS

Construction	ft²	Rate ft²	Cost
Commercial	5,167 ft²	190.00 pf²	981,730

This appraisal report does not constitute a formal valuation.

APPRAISAL SUMMARY**LAMBERT SMITH HAMPTON****Gurnell Leisure Centre****LSH Scenario 2****Financial Viability Analysis**

Blocks C&D Private Residential	393,677 ft²	259.00 pf²	101,962,345	
Blocks E&F Private Residential	214,613 ft²	259.00 pf²	55,584,767	
Leisure Centre	84,992 ft²	340.00 pf²	28,897,280	
Block A London Affordable Rent	330,482 ft²	240.00 pf²	79,315,636	
Block B Shared Ownership	287,299 ft²	240.00 pf²	68,951,650	
Basement & Other	<u>133,472 ft²</u>	190.00 pf²	<u>25,359,680</u>	
Totals	1,449,701 ft²		361,053,088	361,053,088
Contingency		5.00%	18,052,654	
MCIL	746,929 ft²	5.57 pf²	4,160,395	
Borough S106			4,750,000	
				26,963,049
PROFESSIONAL FEES				
Professionals		10.00%	36,105,309	
				36,105,309
MARKETING & LETTING				
Marketing		1.00%	2,983,888	
Letting Agent Fee		10.00%	7,234	
Letting Legal Fee		5.00%	3,617	
				2,994,739
DISPOSAL FEES				
Sales Agent Fee		1.50%	4,475,832	
Sales Legal Fee		0.25%	745,972	
				5,221,804
FINANCE				
Debit Rate 6.000%, Credit Rate 0.500% (Nominal)				
Total Finance Cost				10,999,787
TOTAL COSTS				443,407,776
PROFIT				
				75,023,558
Performance Measures				
Profit on Cost%		16.92%		
Profit on GDV%		14.83%		
Profit on NDV%		14.83%		
Development Yield% (on Rent)		0.02%		
Equivalent Yield% (Nominal)		6.50%		

This appraisal report does not constitute a formal valuation.

APPRAISAL SUMMARY

LAMBERT SMITH HAMPTON

Gurnell Leisure Centre

LSH Scenario 2

Financial Viability Analysis

Equivalent Yield% (True)	6.77%
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IRR	36.07%
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Rent Cover	N/A
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Profit Erosion (finance rate 6.000%)	2 yrs 7 mths
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This appraisal report does not constitute a formal valuation.

Gurnell Leisure Centre
LSH Scenario 3
Financial Viability Analysis

Gurnell Leisure Centre
Ruislip Road East
Ealing
London
W13 0AL

Development Appraisal
Prepared by LSH
Lambert Smith Hampton
20 August 2020

APPRAISAL SUMMARY**LAMBERT SMITH HAMPTON**

Gurnell Leisure Centre
LSH Scenario 3
Financial Viability Analysis

Summary Appraisal for Merged Phases 1 2

Currency in £

REVENUE

Sales Valuation	Units	ft²	Rate ft²	Unit Price	Gross Sales
Blocks C&D Private Residential	1	351,312	656.00	230,460,672	230,460,672
Blocks E&F Private Residential	1	188,292	656.00	123,519,552	123,519,552
Car parking	<u>1</u>	<u>0</u>	0.00	3,200,000	<u>3,200,000</u>
Totals	3	539,604			357,180,224

Rental Area Summary

	Units	ft²	Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV
Commercial	1	5,167	14.00	72,338	72,338	72,338

Investment Valuation

Commercial						
Market Rent	72,338	YP @	6.5000%	15.3846		
		PV 1yr 6mths @	6.5000%	0.9099	1,012,579	

GROSS DEVELOPMENT VALUE**358,192,803****Additional Revenue**

LBE Funding		12,500,000		12,500,000		
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NET REALISATION**370,692,803****OUTLAY****ACQUISITION COSTS**

Agent Fee		40,000				
Legal Fee		30,000				
				70,000		

CONSTRUCTION COSTS

Construction	ft²	Rate ft²	Cost
Commercial	5,167 ft²	190.00 pft²	981,730
Blocks C&D Private Residential	467,076 ft²	259.00 pft²	120,972,612
Blocks E&F Private Residential	254,541 ft²	259.00 pft²	65,926,119

This appraisal report does not constitute a formal valuation.

APPRAISAL SUMMARY**LAMBERT SMITH HAMPTON****Gurnell Leisure Centre****LSH Scenario 3****Financial Viability Analysis**

Leisure Centre	84,992 ft²	340.00 pf²	28,897,280	
Basement & Other	<u>133,472 ft²</u>	190.00 pf²	<u>25,359,680</u>	
Totals	945,248 ft²		242,137,421	242,137,421
Contingency		5.00%	12,106,871	
MCIL	860,256 ft²	5.57 pf²	4,791,624	
Borough S106			4,750,000	
				21,648,495
PROFESSIONAL FEES				
Professionals		10.00%	24,213,742	
				24,213,742
MARKETING & LETTING				
Marketing		1.00%	3,539,802	
Letting Agent Fee		10.00%	7,234	
Letting Legal Fee		5.00%	3,617	
				3,550,653
DISPOSAL FEES				
Sales Agent Fee		1.50%	5,309,703	
Sales Legal Fee		0.25%	884,951	
				6,194,654
FINANCE				
Debit Rate 6.000%, Credit Rate 0.500% (Nominal)				
Total Finance Cost				20,598,162
TOTAL COSTS				318,413,127
PROFIT				
				52,279,675
Performance Measures				
Profit on Cost%		16.42%		
Profit on GDV%		14.60%		
Profit on NDV%		14.60%		
Development Yield% (on Rent)		0.02%		
Equivalent Yield% (Nominal)		6.50%		
Equivalent Yield% (True)		6.77%		
IRR		16.59%		

This appraisal report does not constitute a formal valuation.

APPRAISAL SUMMARY

LAMBERT SMITH HAMPTON

Gurnell Leisure Centre

LSH Scenario 3

Financial Viability Analysis

Rent Cover

722 yrs 9 mths

Profit Erosion (finance rate 6.000%)

2 yrs 7 mths

This appraisal report does not constitute a formal valuation.

Gurnell Leisure Centre
LSH Scenario 4
Financial Viability Study

Gurnell Leisure Centre
Ruislip Road East
Ealing
London
W13 0L

Development Appraisal
Prepared by LSH
Lambert Smith Hampton
20 August 2020

APPRAISAL SUMMARY**LAMBERT SMITH HAMPTON**

Gurnell Leisure Centre
LSH Scenario 4
Financial Viability Study

Summary Appraisal for Merged Phases 1 2

Currency in £

REVENUE

Sales Valuation	Units	ft²	Rate ft²	Unit Price	Gross Sales
Blocks C&D Private Residential	1	147,758	656.00	96,929,248	96,929,248
Blocks E&F Private Residential	1	79,193	656.00	51,950,608	51,950,608
Car parking	1	0	0.00	2,000,000	2,000,000
Block A London Affordable Rent	1	122,294	391.20	47,841,413	47,841,413
Block B Shared Ownership	<u>1</u>	<u>104,657</u>	519.65	54,385,010	<u>54,385,010</u>
Totals	5	453,902			253,106,279

Rental Area Summary

	Units	ft²	Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV
Commercial	1	5,167	14.00	72,338	72,338	72,338

Investment Valuation

Commercial						
Market Rent	72,338	YP @	6.5000%	15.3846		
		PV 1yr 6mths @	6.5000%	0.9099	1,012,579	

GROSS DEVELOPMENT VALUE**254,118,857****Additional Revenue**

LBE Funding		12,500,000		12,500,000		
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NET REALISATION**266,618,857****OUTLAY****ACQUISITION COSTS**

Agent Fee		40,000				
Legal Fee		30,000				
				70,000		

CONSTRUCTION COSTS

Construction	ft²	Rate ft²	Cost
Commercial	5,167 ft²	190.00 pft²	981,730

This appraisal report does not constitute a formal valuation.

APPRAISAL SUMMARY**LAMBERT SMITH HAMPTON****Gurnell Leisure Centre****LSH Scenario 4****Financial Viability Study**

Blocks C&D Private Residential	196,447 ft²	259.00 pf²	50,879,763	
Blocks E&F Private Residential	107,056 ft²	259.00 pf²	27,727,610	
Leisure Centre	84,992 ft²	340.00 pf²	28,897,280	
Block A London Affordable Rent	164,857 ft²	240.00 pf²	39,565,612	
Block B Shared Ownership	143,314 ft²	240.00 pf²	34,395,470	
Basement & Other	133,472 ft²	190.00 pf²	25,359,680	
Totals	835,306 ft²		207,807,145	207,807,145
Contingency		5.00%	10,390,357	
MCIL	442,142 ft²	5.57 pf²	2,462,733	
Borough S106			4,750,000	
MCIL	308,670 ft²	5.57 pf²	1,719,294	
				19,322,384
PROFESSIONAL FEES				
Professionals		10.00%	20,780,715	
				20,780,715
MARKETING & LETTING				
Marketing		1.00%	1,488,799	
Letting Agent Fee		10.00%	7,234	
Letting Legal Fee		5.00%	3,617	
				1,499,649
DISPOSAL FEES				
Sales Agent Fee		1.50%	2,233,198	
Sales Legal Fee		0.25%	372,200	
				2,605,397
FINANCE				
Debit Rate 6.000%, Credit Rate 0.500% (Nominal)				
Total Finance Cost				11,921,992
TOTAL COSTS				264,007,283
PROFIT				
				2,611,574
Performance Measures				
Profit on Cost%		0.99%		
Profit on GDV%		1.03%		
Profit on NDV%		1.03%		
Development Yield% (on Rent)		0.03%		

This appraisal report does not constitute a formal valuation.

APPRAISAL SUMMARY

LAMBERT SMITH HAMPTON

Gurnell Leisure Centre

LSH Scenario 4

Financial Viability Study

Equivalent Yield% (Nominal)	6.50%
Equivalent Yield% (True)	6.77%
IRR	6.96%
Rent Cover	36 yrs 1 mth
Profit Erosion (finance rate 6.000%)	0 yrs 2 mths

This appraisal report does not constitute a formal valuation.

Gurnell Leisure Centre
LSH Scenario 5
Financial Viability Assessment

Gurnell Leisure Centre
Ruislip Road East
Ealing
London
W13 0AL

Development Appraisal
Prepared by LSH
Lambert Smith Hampton
20 August 2020

APPRAISAL SUMMARY**LAMBERT SMITH HAMPTON**

Gurnell Leisure Centre
LSH Scenario 5
Financial Viability Assessment

Summary Appraisal for Merged Phases 1 2

Currency in £

REVENUE**Sales Valuation**

	Units	ft²	Rate ft²	Unit Price	Gross Sales
Blocks C&D Private Residential	1	205,277	656.00	134,661,712	134,661,712
Blocks E&F Private Residential	1	110,022	656.00	72,174,432	72,174,432
Car parking	<u>1</u>	<u>0</u>	0.00	3,200,000	<u>3,200,000</u>
Totals	3	315,299			210,036,144

Rental Area Summary

	Units	ft²	Rate ft²	Initial MRV/Unit	Net Rent at Sale	Initial MRV
Commercial	1	5,167	14.00	72,338	72,338	72,338

Investment Valuation**Commercial**

Market Rent	72,338	YP @	6.5000%	15.3846		
		PV 1yr 6mths @	6.5000%	0.9099	1,012,579	

GROSS DEVELOPMENT VALUE**211,048,723****Additional Revenue**

LBE Funding			12,500,000			
				12,500,000		

NET REALISATION**223,548,723****OUTLAY****ACQUISITION COSTS**

Agent Fee			40,000			
Legal Fee			30,000			
				70,000		

CONSTRUCTION COSTS

Construction	ft²	Rate ft²	Cost
Commercial	5,167 ft²	190.00 pft²	981,730
Blocks C&D Private Residential	272,920 ft²	259.00 pft²	70,686,156
Blocks E&F Private Residential	148,732 ft²	259.00 pft²	38,521,676

This appraisal report does not constitute a formal valuation.

APPRAISAL SUMMARY**LAMBERT SMITH HAMPTON****Gurnell Leisure Centre****LSH Scenario 5****Financial Viability Assessment**

Leisure Centre	84,992 ft²	340.00 pf²	28,897,280	
Basement & Other	<u>133,472 ft²</u>	190.00 pf²	<u>25,359,680</u>	
Totals	645,283 ft²		164,446,522	164,446,522
Contingency		5.00%	8,222,326	
MCIL	426,819 ft²	5.57 pf²	2,377,381	
MCIL	133,472 ft²	5.57 pf²	743,439	
Borough S106			4,750,000	
				16,093,146
PROFESSIONAL FEES				
Professionals		10.00%	16,444,652	
				16,444,652
MARKETING & LETTING				
Marketing		1.00%	2,068,361	
Letting Agent Fee		10.00%	7,234	
Letting Legal Fee		5.00%	3,617	
				2,079,212
DISPOSAL FEES				
Sales Agent Fee		1.50%	3,102,542	
Sales Legal Fee		0.25%	517,090	
				3,619,633
FINANCE				
Debit Rate 6.000%, Credit Rate 0.500% (Nominal)				
Total Finance Cost				17,728,525
TOTAL COSTS				220,481,691
PROFIT				
				3,067,032
Performance Measures				
Profit on Cost%		1.39%		
Profit on GDV%		1.45%		
Profit on NDV%		1.45%		
Development Yield% (on Rent)		0.03%		
Equivalent Yield% (Nominal)		6.50%		
Equivalent Yield% (True)		6.77%		
IRR		6.68%		

This appraisal report does not constitute a formal valuation.

APPRAISAL SUMMARY

LAMBERT SMITH HAMPTON

Gurnell Leisure Centre LSH Scenario 5 Financial Viability Assessment

Rent Cover	42 yrs 5 mths
Profit Erosion (finance rate 6.000%)	0 yrs 3 mths

This appraisal report does not constitute a formal valuation.

APPENDIX 4: PROPOSED SCHEME BUILD COST ANALYSIS (CORE 5)

DRAFT FOR DISCUSSION

Gurnell Leisure Centre Redevelopment
Leisure Centre & Residential Blocks A&B
for Ealing Council

DRAFT Stage 2 Cost Estimate
July 2019

Contents

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6.0	Area Schedule
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	Appendix D: Residential Fitout Model
	Appendix E: GA Markup
	Appendix F: Benchmarking
	Appendix G: Cashflow

Document Issue Sheet

Issue Nr.	Document	Issue Date	Parties Sent To	Prepared By	Checked By	Reviewed By
1	Stage 2 Cost Estimate - Basement, lesiure Centre and Residential Blocks A&B	19/07/19	LSH/LBE	DC/GM	JDB / JDW	JDB / JDW

Authorised by (Partner)	
Date	19/07/2019

1.0 Introduction

1.0 Introduction

- 1.1 The following cost estimate is for Basement, Leisure Centre and Residential Blocks A & B to be built on the site of the current Gurnell leisure centre.
- 1.2 The current costs have been based on the information included in section 3.0. this information has been provided by Ealing Council
- 1.3 The basis of this estimate can be seen in section 5.0, all exclusions and key risks/owners are noted in section 6.0
- 1.4 The costs currently exclude all works associated with the construction of the private residential blocks
- 1.5 The GIA used to calculate the current cost is 384,807 ft2 this has been measured from the GA plans provided, all variances from the 3D Reid/Ecoworld area schedule can be seen in section 6.0.
- 1.6 The current cost for the leisure centre this is based on the following key scope items:
 - 50m competition pool included in wet area
 - Assume 50:50 ratio of glazed and solid façade materials
 - Assume new steel frame and roof structure
 - Assume replacement of all plant and connection to existing utilities
 - No client FF&E has been included (assume covered under client budget held separately to this construction budget, on a project of this size and nature we would anticipate a budget figure in the range of £2-2.5m)
- 1.7 All costs have been benchmarked against leisure projects of a similar standard and size, current costs are inline with what we would expect for a project of this size and Wet to Dry ratio.
- 1.8 Key elements for the residential development have been benchmarked against similar projects including; façade blended rate, fitout rate and the shell & core rate, see section 9.0
- 1.9 An adjustment has been made to the total estimated cost to be transferred to Ecoworld following the issue of the proposed interface document, this is noted within the executive summary and elemental summary along with the assumed scope.

2.0 Executive Summary

2.0 Executive Summary

- 2.1 The estimated cost for the Gurnell Leisure Centre, for the current plans noted in the Eco World design presentation (full document list noted in section 3), is £107,900,000 (Excl VAT, including: Main Contractor Preliminaries, OHP, Contractor (D&B) Risk and Inflation)
- 2.2 Core Five advised on the 14/02/2019 the estimated value for these elements was £113,245,000 (incl contingency), this was subsequently reduced to £103,862,000 following discussions with the proposed developer on the basis of correcting the basement measurement, reducing the BTR fitout rate and reducing the overall Leisure cost/rate. The reduction of the Leisure cost was noted as a significant risk on issuing the Core Five estimate 21/02/19, this risk has been realised in this estimate with the majority of the cost uplift being apportioned to the Leisure Mechanical and Electrical estimate.
- 2.3 This estimate is based upon the information, assumptions and exclusions listed within Sections 3.0, 4.0 and 5.0 of this report. Works have been priced at 2Q 2019, Inflation has been excluded.
- 2.4 The estimated Construction costs are as summarised below:

Item		Qty	Construction Rate	Total (£)
1.0	Demolitions & Site Clearance			£1,050,000
2.1	Basement Construction Cost	136,672	£150 ft ²	£20,720,000
2.2	Leisure Construction Cost	88,374	£260 ft ²	£23,220,000
2.3	Residential Block A&B Shell and Core Cost	173,252	£130 ft ²	£22,630,000
2.4	Residential Block A&B Fitout Costs	127,836	£100 ft ²	£12,830,000
3.1	External Works & Landscaping	398,299	£3 ft ²	£1,250,000
4.1	Utilities	398,299	£5 ft ²	£1,960,000
5.1	Main Contractor Preliminaries	16%	£79 ft ²	£10,820,000
6.1	Overheads & Profit	4%	£23 ft ²	£3,140,000
7.1	Contractor (D&B) Risk		Included in client held contingency	
8.1	Client Controlled Contingency	10%	£25 ft ²	£9,760,000
9.1	Client FF&E Allowance		Excluded	Excluded
10.1	Allowance for Out-Turn Inflation		Excluded	Excluded
Total Construction Cost Blocks A&B, Leisure and Basement		398,299	£270 ft²	£107,380,000

Total Cost of Leisure Centre, Residential Blocks A&B and Abnormals (excluding contingencies):

£71,360,000

2.1 Finalised Cost Following Interface Adjustment

2.1.1 The below table notes a split between the current estimate costs for the Basement, Leisure Centre and Residential Blocks A&B only based on the Ecoworld Interface scope split

2.1.2 Please note section 3 includes the basis of the proposed split and current assumptions, key points noted below:

- Ecoworld London assumed to be responsible for site clearance and all excavation
- EWL assumed to be responsible for all substructure works
- EWL assumed to be responsible for basement frame (from basement slab to lid/ground floor slab)
- LBE retaining costs for MEP to basement and Energy Centre (circa £5.5m)
- LBE retaining reasonability for all works above ground leisure centre, residential blocks A&B and part of the landscaping/external works

Item		Qty	EWL Total (£)	LBE Total (£)
1.0	Demolitions & Site Clearance		£1,050,000	£0
2.1	Basement Construction Cost	136,672	£9,760,000	£10,960,000
2.2	Leisure Construction Cost	88,374	£2,080,000	£21,140,000
2.3	Residential Block A&B Shell and Core Cost	173,252	£2,670,000	£19,960,000
2.4	Residential Block A&B Fitout Costs	127,836	£0	£12,830,000
3.1	External Works & Landscaping	398,299	£0	£1,250,000
4.1	Utilities	398,299	£0	£1,960,000
5.1	Main Contractor Preliminaries	16%	£2,490,000	£8,330,000
6.1	Overheads & Profit	4%	£740,000	£2,400,000
7.1	Contractor (D&B) Risk		Included in client held contingency	
8.1	Client Controlled Contingency	10%	£1,880,000	£7,880,000
9.1	Client FF&E Allowance		Excluded	Excluded
10.1	Allowance for Out-Turn Inflation		Excluded	Excluded
Total Construction Cost Blocks A&B, Leisure and Basement		398,299	£20,670,000	£86,710,000

Total Cost of Leisure Centre, Residential Blocks A&B and Abnormals (excluding contingencies):
£67,745,184

3.1 Elemental Summary

Gurnell Leisure Redevelopment - Leisure Centre and Residential Blocks A and B

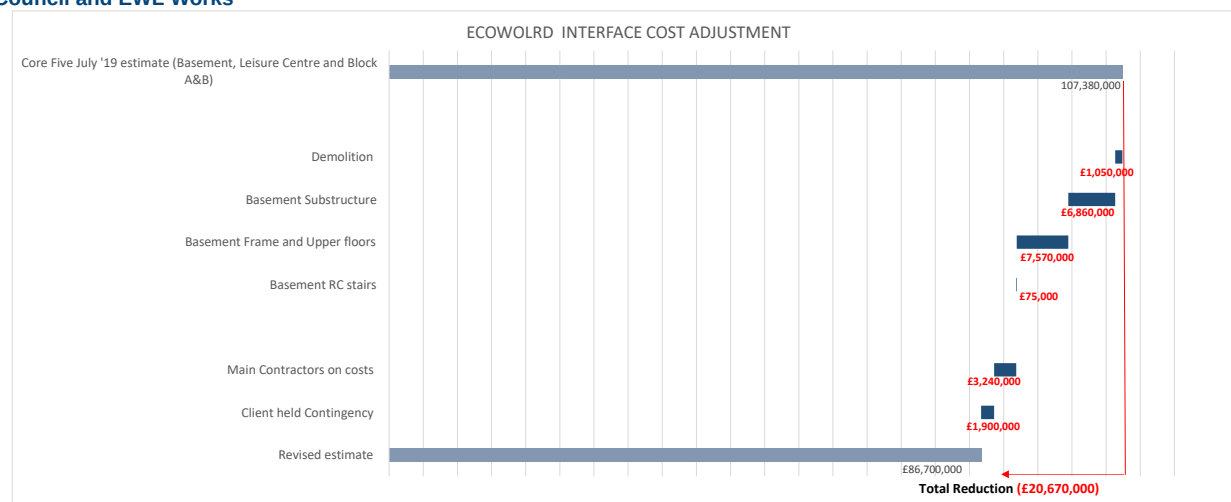
Cost Estimate DRAFT

3 Elemental Summary

Nr	Element	Basement			Leisure			Residential Blocks A & B			Total Construction Costs		
		Area (ft²)	Cost per (ft²)	Total (£)	Area (ft²)	Cost per (ft²)	Total (£)	Area (ft²)	Cost per (ft²)	Total (£)	Area (ft²)	Cost per (ft²)	Total (£)
1	Shell & Core												
1	Demolitions & Site Clearance	136,672	£8	1,050,000	88,374	£0	0	173,252	£0		398,299	£3	1,050,000
2	Substructure	136,672	£15	2,110,000	88,374	£24	2,080,000	173,252	£15	2,673,000	398,299	£17	6,863,000
3	Frame	136,672	£55	7,570,000	88,374	£22	1,960,000	173,252	£10	1,700,000	398,299	£28	11,230,000
4	Upper Floors	136,672	£0	0	88,374	£11	1,003,000	173,252	£23	3,932,000	398,299	£12	4,935,000
5	Roof	136,672	£0	0	88,374	£15	1,340,000	173,252	£3	530,000	398,299	£5	1,870,000
6	Stairs	136,672	£1	75,000	88,374	£2	190,000	173,252	£3	440,000	398,299	£2	705,000
7	External Walls & Windows	136,672	£0	0	88,374	£27	2,411,000	173,252	£31	5,348,000	398,299	£19	7,759,000
8	External Doors	136,672	£0	0	88,374	£0	39,000	173,252	£0	85,000	398,299	£0	124,000
9	Internal Walls & Partitions	136,672	£9	1,230,000	88,374	£9	760,000	173,252	£3	520,000	398,299	£6	2,510,000
10	Internal Doors	136,672	£0	60,000	88,374	£2	170,000	173,252	£3	510,000	398,299	£2	740,000
11	Floor Finishes	136,672	£4	520,000	88,374	£8	730,000	173,252	£2	400,000	398,299	£4	1,650,000
12	Wall Finishes	136,672	£1	170,000	88,374	£2	210,000	173,252	£1	120,000	398,299	£1	500,000
13	Ceiling Finishes	136,672	£1	130,000	88,374	£7	580,000	173,252	£1	140,000	398,299	£2	850,000
14	Fixtures & Fittings	136,672	£1	150,000	88,374	£18	1,600,000	173,252	£1	250,000	398,299	£5	2,000,000
15	Mechanical and Electrical (inc Lifts)	136,672	£64	8,700,000	88,374	£115	10,150,000	173,252	£35	5,980,000	398,299	£62	24,830,000
	Shell & Core Sub Total	136,672	£160	21,770,000	88,374	£260	23,220,000	173,252	£130	22,630,000	398,299	£170	67,620,000
19	Main Contractor Preliminaries	16%		3,480,000	16%		3,720,000	16%		3,620,000	16%		10,820,000
20	Overheads & Profit	4%		1,010,000	4%		1,080,000	4%		1,050,000	4%		3,140,000
21	Contractor (D&B) Risk	Included in client held contingency			Included in client held contingency			Included in client held contingency			Included in client held contingency		
	Shell & Core Sub Total	136,672	£190	26,260,000	88,374	£320	28,020,000	173,252	£160	27,300,000	398,299	£200	81,580,000
16	Residential Fitout	136,672	£0	Excluded	88,374	£0	Excluded	127,836	£100	12,830,000	352,883	£0	12,830,000
	Sub Total	136,672	£0	26,260,000	88,374	£0	28,020,000	173,252	£230	40,130,000	398,299	£240	94,410,000
17	External Works & Landscaping	136,672	£0	Excluded	88,374	£0	1,250,000	173,252	£0	Excluded	398,299	£0	1,250,000
18	Utilities	136,672	£0	Excluded	88,374	£7	660,000	173,252	£8	1,300,000	398,299	£5	1,960,000
	Sub Total	136,672	£190	26,260,000	88,374	£340	29,930,000	173,252	£240	41,430,000	398,299	£250	97,620,000
22	Client/Operator FF&E - Allowance			Excluded			Excluded			Excluded			Excluded
23	Client held Contingency		10%	2,630,000		10%	2,990,000		10%	4,140,000		10%	9,760,000
	Total Construction Cost	136,672	£210	28,890,000	88,374	£370	32,920,000	173,252	£260	45,570,000	398,299	£270	107,380,000

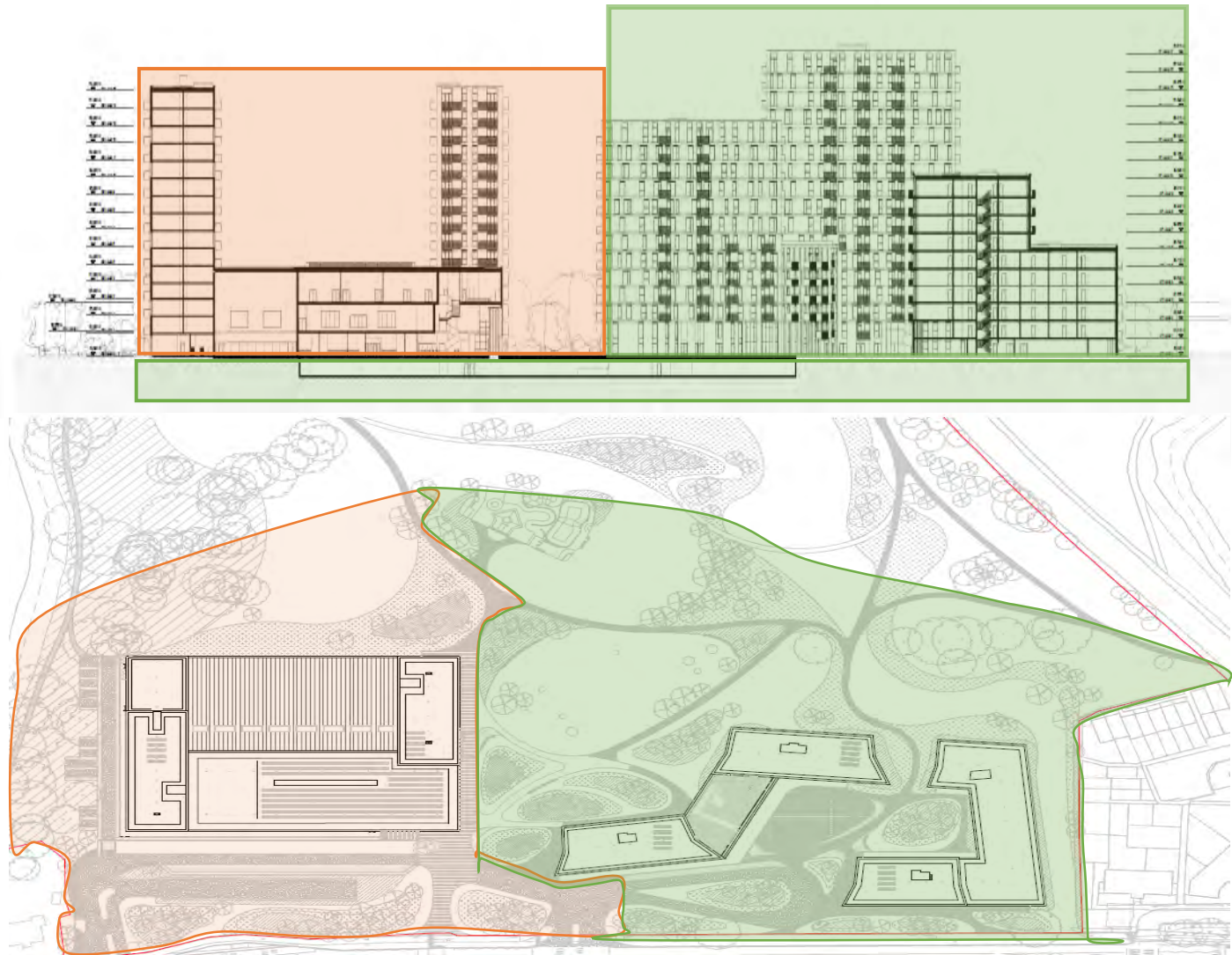
Ecoworld Interface cost adjustments - as per 'Interface Document Between Ealing Council and EWL Works

Nr	Element	Interface Adjustment		
		Area (ft²)	Cost per (ft²)	Total (£)
1	Demolitions & Site Clearance	398,299	£3	(£1,050,000)
2	Substructure (entire site)	398,299	£17	(£6,860,000)
3	Frame	398,299	£19	(£7,570,000)
4	Upper Floors	398,299	£0	
5	Roof	398,299	£0	
6	Stairs	398,299	(£0)	(£75,000)
7	External Walls & Windows	398,299	£0	
8	External Doors	398,299	£0	
9	Internal Walls & Partitions	398,299	£0	
10	Internal Doors	398,299	£0	
11	Floor Finishes	398,299	£0	
12	Wall Finishes	398,299	£0	
13	Ceiling Finishes	398,299	£0	
14	Fixtures & Fittings	398,299	£0	
15	Services	398,299	£0	
	Shell & Core Sub Total	398,299	(£40)	(£15,980,000)
19	Main Contractor Preliminaries	16%		(£2,490,000)
20	Overheads & Profit	4%		(£720,000)
21	Contractor (D&B) Risk	Included in client held contingency		
	Shell & Core Sub Total	398,299	(£50)	(£18,770,000)
17	External Works & Landscaping	398,299	£0	Excluded
18	Service Diversions	398,299	£0	Excluded
	Sub Total	398,299	(£50)	(£18,770,000)
22	Client Held Contingency		10%	(£1,900,000)
	Total Construction Cost Adjustment	398,299	(£50)	(£20,670,000)



London Borough Ealing Site

Ecoworld London Site



Assumed Interface Scope Adjustment
1. Assumed EWL providing all substructure including piling, pile caps, capping beams, basement slab and ground floor slab/basement lid
2. Assumed EWL providing basement retaining walls and cavity drainage
3. Assumed EWL providing all structural columns within basement box
4. Assumed EWL providing all RC core walls and stairs to basement box
5. Assumed EWL proving structure for main pool, associated drainage and connections/Builder work
6. Assumed EWL to carry out all demolition, site clearance and excavations

Interface Key Comments
1. Ecoworld London basement works noted as partial completion, we assume this means excluding finishes etc. as noted under Ealing Council responsibility
2. EC responsible for section 106 works for Themes Water, scope unclear and excluded from current cost estimate however, is this S106 calculated on the basis of the entire site?
3. EC responsible for the construction of new bell mouths. We assumed the new bell mouths will be to the adjacent canal – there is no detail provided on this and is currently excluded from the estimate.
4. EC to provide traffic management for site access road, is site access to be shared between both EWL and EC?
5. Leisure/Blocks A&B basement to have piles installed by EWL but no pile caps or link beams. Assumed EWL are responsible for all substructure works
6. Finishes not included in EWL basement scope, it's unclear if this is to the entire basement or just the basement area allocated to leisure/Blocks A&B
7. EC are down to provide all carpark equipment and ventilation, this should be split on a zone/area basis as the majority of the carpark services the private residential units
8. EC to carry out all waterproofing works to basement? EWL responsible for constructing basement box?
9. EC responsible for waterproofing to basement slab and ground floor slab to zones 1 & 2? EWL scope should end at waterproofing basement/podium prior to EC taking ownership of zone one to construct
10. EC take design responsibility to fit waterproofing in accordance with manufacturers requirements, EWL assumed to take responsibility for waterproofing basement and ground floor slab
11. EC takes design responsibility for Builders work? EWL to take reasonability for all builders work through ground floor slab
12. EC must consult with EWL if they wish to appoint different consultants to incumbent, allowance must be made within clients professional fees budget
13. Current cost for energy centre quoted as £2.4m, EC responsible for full commissioning and two year warranty
14. EC responsible for construction of new road and all finishes, road to service entire site?

3.2 Cost Reconciliaton

Gurnell Leisure Redevelopment - Leisure Centre and Residential Blocks A and B

Cost Estimate DRAFT



3 Cost Reconciliation

		Basement			Leisure				Residential Blocks A & B								
		Core Five Estimate 19/07/19		Core Five Estimate 21/02/19	Variance	Core Five Estimate 19/07/19		Core Five Estimate 21/02/19	Variance	Core Five Estimate 19/07/19		Core Five Estimate 21/02/19	Variance				
Nr	Element	Cost per (ft²)	Total (£)	Cost per (ft²)	Total (£)	Cost per (ft²)	Total (£)	Cost per (ft²)	Total (£)	Cost per (ft²)	Total (£)	Cost per (ft²)	Total (£)	Variance	Comments		
Shell & Core																	
1	Demolitions & Site Clearance	£8/m²	1,050,000	£0/m²	0	1,050,000	£0/m²	0	£0/m²	0	£9/m²	1,522,500	(1,522,500)		Movement of demolition costs to Basement as currently proposed to site within Ecoworld basement costs		
2	Substructure	£15/m²	2,110,000	£20/m²	2,800,000	(690,000)	£25/m²	2,080,000	£21/m²	1,710,000	370,000	£15/m²	2,673,000	£12/m²		2,077,667	595,333
3	Frame and upper floors	£55/m²	7,570,000	£52/m²	7,100,000	470,000	£35/m²	2,963,000	£30/m²	2,430,000	533,000	£33/m²	5,632,000	£30/m²	5,194,168	437,832	Substructure and frame design provided, an allowance for RC and steel frames has been made
5	Roof	£0/m²	0	£0/m²	0	0	£16/m²	1,340,000	£16/m²	1,340,000	0	£3/m²	530,000	£3/m²	514,400	15,600	
6	Stairs	£1/m²	75,000	£2/m²	340,000	(265,000)	£2/m²	190,000	£2/m²	200,000	(10,000)	£3/m²	440,000	£2/m²	290,000	150,000	
7	External Walls & Windows & Doors	£0/m²	0	£0/m²	0	0	£29/m²	2,450,000	£23/m²	1,900,000	550,000	£31/m²	5,433,000	£29/m²	4,942,302	490,698	Residential façade equates to £640/m2 based on blended rate, previously assumed to be £600/m2
9	Internal Walls & Partitions & Doors	£9/m²	1,290,000	£10/m²	1,360,000	(70,000)	£11/m²	930,000	£11/m²	900,000	30,000	£6/m²	1,030,000	£9/m²	1,558,250	(528,250)	
11	Floor Finishes	£4/m²	520,000	£2/m²	340,000	180,000	£9/m²	730,000	£9/m²	740,000	(10,000)	£2/m²	400,000	£1/m²	173,139	226,861	
12	Wall Finishes	£1/m²	170,000	£2/m²	340,000	(170,000)	£3/m²	210,000	£3/m²	240,000	(30,000)	£1/m²	120,000	£2/m²	346,278	(226,278)	
13	Ceiling Finishes	£1/m²	130,000	£1/m²	170,000	(40,000)	£7/m²	580,000	£5/m²	410,000	170,000	£1/m²	140,000	£1/m²	173,139	(33,139)	
14	Fixtures & Fittings	£1/m²	150,000	£2/m²	210,000	(60,000)	£19/m²	1,600,000	£16/m²	1,290,000	310,000	£1/m²	250,000	£1/m²	173,139	76,861	
15	Services	£63/m²	8,700,000	£65/m²	8,850,000	(150,000)	£122/m²	10,150,000	£98/m²	7,970,000	2,180,000	£35/m²	5,980,000	£30/m²	5,182,200	797,800	Risk London plan previously noted against leisure has been partially realised within this cost estimate. NB: energy centre allocated to basement costs @ circa \$5m
Shell & Core Sub Total		£160/m²	21,770,000	£157/m²	21,510,000	260,000	£280/m²	23,220,000	£234/m²	19,130,000	4,090,000	£130/m²	22,630,000	£128/m²	22,150,000	480,000	
19	Main Contractor Preliminaries	£25/m²	3,480,000	£25/m²	3,440,000	40,000	3,720,000	£33/m²	2,680,000	1,040,000	£21/m²	3,620,000	£23/m²	3,990,000	(370,000)		
20	Overheads & Profit	£7/m²	1,010,000	£7/m²	1,000,000	10,000	1,080,000	£11/m²	870,000	210,000	£6/m²	1,050,000	£10/m²	1,710,000	(660,000)		
21	Contractor (D&B) Risk	Included in 10% contingency		Excluded		0	Included in 10% contingency		Excluded		0	Included in 10% contingency		Excluded		0	
22	Client FF&E - Allowance	Excluded		Excluded		0	Excluded		Excluded		0	Excluded		Excluded		0	
23	Inflation (Start on Site Q4 2020)	Excluded		Excluded		0	Excluded		Excluded		0	Excluded		Excluded		0	
Total Shell & Core Cost		£190/m²	26,260,000	£190/m²	26,000,000	260,000	£340/m²	28,020,000	£278/m²	22,680,000	5,300,000	£160/m²	27,300,000	£160/m²	27,850,000	(600,000)	
Fitout																	
16	Residential Fitout	£0/m²	0	£0/m²	0	0	£0/m²	0	£0/m²	0	0	£100/m²	12,830,000	£100/m²	12,260,000	570,000	
Sub Total		£190/m²	26,260,000	£190/m²	26,000,000	260,000	£0/m²	28,020,000	£278/m²	22,680,000	5,340,000	£230/m²	40,130,000	£232/m²	40,110,000	20,000	
17	External Works & Landscaping	£0/m²	Excluded	£0/m²	Excluded	0	£7/m²	1,250,000	£6/m²	1,000,000	250,000	£0/m²	Excluded	£0/m²	Excluded	0	
18	Utilities	£0/m²	Excluded	£0/m²	Excluded	0	£4/m²	660,000	£5/m²	930,000	(270,000)	£8/m²	1,300,000	£9/m²	1,560,000	(260,000)	
Total Construction Cost		£190/m²	26,260,000	£190/m²	26,000,000	260,000	£360/m²	29,930,000	£301/m²	24,610,000	5,320,000	£240/m²	41,430,000	£241/m²	41,670,000	(240,000)	

4 Basis & Assumptions

4 Basis & Assumptions

4.1 Basis of Estimate

Ref	Drawing Name	Reference	Revision	Date Received
<u>Architecture</u>				
1	Building A/B - Proposed Floor Plan L00	180237-3DR-AB-DR-00200	P02	02/07/2019
2	Building A/B - Proposed Floor Plan L01	180237-3DR-AB-DR-00201	P02	02/07/2019
3	Building A/B - Proposed Floor Plan L02	180237-3DR-AB-DR-00202	P02	02/07/2019
4	Building A/B - Proposed Floor Plan L03	180237-3DR-AB-DR-00203	P02	02/07/2019
5	Building A/B - Proposed Floor Plan L04	180237-3DR-AB-DR-00204	P02	02/07/2019
6	Building A/B - Proposed Floor Plan L05	180237-3DR-AB-DR-00205	P02	02/07/2019
7	Building A/B - Proposed Floor Plan L06	180237-3DR-AB-DR-00206	P02	02/07/2019
8	Building A/B - Proposed Floor Plan L07	180237-3DR-AB-DR-00207	P02	02/07/2019
9	Building A/B - Proposed Floor Plan L08	180237-3DR-AB-DR-00208	P02	02/07/2019
10	Building A/B - Proposed Floor Plan L09	180237-3DR-AB-DR-00209	P02	02/07/2019
11	Building A/B - Proposed Floor Plan L10	180237-3DR-AB-DR-00210	P02	02/07/2019
12	Building A/B - Proposed Floor Plan L11	180237-3DR-AB-DR-00211	P02	02/07/2019
13	Building A/B - Proposed Floor Plan L12	180237-3DR-AB-DR-00212	P02	02/07/2019
14	Building A/B - Proposed Floor Plan L13	180237-3DR-AB-DR-00213	P02	02/07/2019
15	Building A/B - Proposed Floor Plan L14	180237-3DR-AB-DR-00214	P02	02/07/2019
16	Building A/B - Proposed Roof Plan	180237-3DR-AB-DR-00215	P02	02/07/2019
17	GLC - Existing Ground Floor Plan L00	180237-3DR-LC-00-DR-00100	P03	02/07/2019
18	GLC - Proposed Floor Plan L00	180237-3DR-LC-00-DR-00200	P03	02/07/2019
19	GLC - Existing First Floor Plan	180237-3DR-LC-01-DR-00101	P03	02/07/2019
20	GLC - Proposed Floor Plan L01	180237-3DR-LC-01-DR-00201	P02	02/07/2019
21	GLC - Proposed Floor Plan L02	180237-3DR-LC-02-DR-00202	P02	02/07/2019
22	GLC - Proposed Roof Plan	180237-3DR-LC-03-DR-00203	P02	02/07/2019
23	GLC - Proposed Basement Plan LB	180237-3DR-LC-B-DR-00199	P02	02/07/2019
24	GLC - Building A/B - Proposed Section AA'	180237-3DR-LC-XX-DR-00301	P02	02/07/2019
25	GLC - Building A/B - Proposed Section BB'	180237-3DR-LC-XX-DR-00302	P02	02/07/2019
26	GLC - Building A/B - North Elevation	180237-3DR-LC-XX-DR-00401	P02	02/07/2019
27	GLC - Building A/B - East Elevation	180237-3DR-LC-XX-DR-00402	P02	02/07/2019
28	GLC - Building A/B - South Elevation	180237-3DR-LC-XX-DR-00403	P02	02/07/2019
29	GLC - Building A/B - West Elevation	180237-3DR-LC-XX-DR-00404	P02	02/07/2019
30	GLC - Building A Inside Elevation	180237-3DR-LC-XX-DR-00405	P02	02/07/2019
31	GLC - Building B Inside Elevation	180237-3DR-LC-XX-DR-00406	P02	02/07/2019
32	Existing Site Location Plan	180237-3DR-MP-00-DR-00100	P03	02/07/2019
33	Existing Site Plan	180237-3DR-MP-00-DR-00101	P03	02/07/2019
34	Demolition Plan	180237-3DR-MP-00-DR-00102	P03	02/07/2019
35	Existing & Proposed MOL	180237-3DR-MP-00-DR-00103	P03	02/07/2019

4 Basis & Assumptions

Ref	Drawing Name	Reference	Revision	Date Received
36	Proposed Site Location Plan	180237-3DR-MP-00-DR-00104	P03	02/07/2019
37	Proposed Site Plan	180237-3DR-MP-00-DR-00105	P03	02/07/2019
38	Proposed Ground Floor Plan L00	180237-3DR-MP-00-DR-00200	P03	02/07/2019
39	Proposed Ground Floor Plan L01	180237-3DR-MP-01-DR-00201	P03	02/07/2019
40	Proposed Ground Floor Plan L02	180237-3DR-MP-02-DR-00202	P03	02/07/2019
41	Proposed Ground Floor Plan L03	180237-3DR-MP-03-DR-00203	P03	02/07/2019
42	Proposed Ground Floor Plan L04	180237-3DR-MP-04-DR-00204	P03	02/07/2019
43	Proposed Ground Floor Plan L05	180237-3DR-MP-05-DR-00205	P03	02/07/2019
44	Proposed Ground Floor Plan L06	180237-3DR-MP-06-DR-00206	P03	02/07/2019
45	Proposed Ground Floor Plan L07	180237-3DR-MP-07-DR-00207	P03	02/07/2019
46	Proposed Ground Floor Plan L08	180237-3DR-MP-08-DR-00208	P03	02/07/2019
47	Proposed Ground Floor Plan L09	180237-3DR-MP-09-DR-00209	P03	02/07/2019
48	Proposed Ground Floor Plan L10	180237-3DR-MP-10-DR-00210	P03	02/07/2019
49	Proposed Ground Floor Plan L11	180237-3DR-MP-11-DR-00211	P03	02/07/2019
50	Proposed Ground Floor Plan L12	180237-3DR-MP-12-DR-00212	P03	02/07/2019
51	Proposed Ground Floor Plan L13	180237-3DR-MP-13-DR-00213	P03	02/07/2019
52	Proposed Ground Floor Plan L14	180237-3DR-MP-14-DR-00214	P03	02/07/2019
53	Proposed Ground Floor Plan L15	180237-3DR-MP-15-DR-00215	P03	02/07/2019
54	Proposed Sixteenth Floor Plan L16	180237-3DR-MP-16-DR-00216	P03	02/07/2019
55	Proposed Roof Plan L17	180237-3DR-MP-17-DR-00217	P03	02/07/2019
56	Proposed Basement Plan LB	180237-3DR-MP-B-DR-00199	P03	02/07/2019
57	Proposed Long Section AA' and Short Section BB' in context	180237-3DR-MP-XX-DR-00301	P03	02/07/2019
58	Proposed Short Section CC' and Short Section DD' in context	180237-3DR-MP-XX-DR-00302	P03	02/07/2019
59	Proposed North Elevation and South Elevation in context	180237-3DR-MP-XX-DR-00401	P03	02/07/2019
60	Proposed East Elevation and West Elevation in context	180237-3DR-MP-XX-DR-00402	P03	02/07/2019
Structures				
61	Gurnell Leisure Redevelopment - Structural Take Off Rev B			
62	Gurnell Leisure Redevelopment July 2019 - Basement Columns			
63	Building A & B General Arrangement	180237-PAR-AB-01-DR-S-00201	P02	02/07/2019
64	Gurnell Leisure Centre Level 02 General Arrangement	180237-PAR-AB-02-DR-S-00102	P04	02/07/2019
65	Building A & B Level 02 General Arrangement	180237-PAR-AB-02-DR-S-00202	P02	02/07/2019
66	Gurnell Leisure Centre Roof Level General Arrangement	180237-PAR-AB-03-DR-S-00103	P04	02/07/2019
67	Building A & B Level 03 General Arrangement	180237-PAR-AB-03-DR-S-00203	P02	02/07/2019
68	Building A & B Level 04 General Arrangement	180237-PAR-AB-04-DR-S-00204	P02	02/07/2019
69	Building A & B Level 05 General Arrangement	180237-PAR-AB-05-DR-S-00205	P02	02/07/2019
70	Building A & B Level 06 General Arrangement (Typical 06-13)	180237-PAR-AB-06-DR-S-00206	P02	02/07/2019
71	Building A & B Level 15 Roof General Arrangement	180237-PAR-AB-15-DR-S-00215	P02	02/07/2019
72	Gurnell Leisure Centre L00 General Arrangement	180237-PAR-GLC-00-DR-S-00100	P04	02/07/2019

4 Basis & Assumptions

Ref	Drawing Name	Reference	Revision	Date Received
73	Gurnell Leisure Centre L01 General Arrangement	180237-PAR-GLC-01-DR-S-00101	P03	02/07/2019
74	Gurnell Leisure Piling Arrangement	180237-PAR-GLC-B1-DR-S-00097	P04	02/07/2019
75	Gurnell Leisure Foundation Level Arrangement	180237-PAR-GLC-B1-DR-S-00098	P04	02/07/2019
76	Gurnell Leisure Basement and Carpark Level Arrangement	180237-PAR-GLC-B1-DR-S-00099	P04	02/07/2019
77	SECTION A-A	180237-PAR-GLC-XX-DR-S-01200	P02	02/07/2019
78	SECTION B-B	180237-PAR-GLC-XX-DR-S-01201	P02	02/07/2019
79	SECTION C-C	180237-PAR-GLC-XX-DR-S-01202	P02	02/07/2019
80	SECTION D-D	180237-PAR-GLC-XX-DR-S-01203	P02	02/07/2019
81	SECTION E-E	180237-PAR-GLC-XX-DR-S-01204	P02	02/07/2019
MEP				
82	LV Tenants & Landlords Switch room Layout Block A	16191-CPW-A-XX-EC-80001	P2	02/07/2019
83	LV Secondary Supply Switch room Layout Block A	16191-CPW-A-XX-EC-80002	P2	02/07/2019
84	Block A Primary Distribution	16191-CPW-A-XX-MC-22001	P2	02/07/2019
85	Block A Tank Room	16191-CPW-A-XX-MC-60001	P1	02/07/2019
86	Block A Typical Floor Layout	16191-CPW-A-XX-MC-70001	P2	02/07/2019
87	LV Tenants & Landlords Switch room Layout Block B	16191-CPW-B-XX-MC-80001	P2	02/07/2019
88	LV Secondary Supply Switch room Layout Block B	16191-CPW-B-XX-MC-80002	P2	02/07/2019
89	Block B Primary Distribution Layout	16191-CPW-B-XX-MC-22001	P2	02/07/2019
90	Block B Water Storage Tank Room	16191-CPW-B-XX-MC-60001	P2	02/07/2019
91	Block B Typical Floor Layout	16191-CPW-B-XX-MC-70001	P2	02/07/2019
92	Block C Ground Floor Distribution P2	16191-CPW-C-00-MC-22001	P2	02/07/2019
93	Proposed Electrical Distribution Layout Block C First Floor	16191-CPW-C-01-EC-11001	P2	02/07/2019
94	Proposed Electrical Distribution Layout Block C Second Floor	16191-CPW-C-02-EC-11001	P2	02/07/2019
95	LV Tenants & Landlords Switch room Layout Block C	16191-CPW-C-XX-EC-80001	P2	02/07/2019
96	LV Secondary Supply Switch room Layout Block C	16191-CPW-C-XX-EC-80002	P2	02/07/2019
97	Above Ground Drainage Typical Floor Layout Block C	16191-CPW-C-XX-MC-40001	P2	02/07/2019
98	Block C Tank Room Layout	16191-CPW-C-XX-MC-60001	P1	02/07/2019
99	Block C Typical Floor Layout	16191-CPW-C-XX-MC-70001	P2	02/07/2019
100	Proposed Electrical Distribution Layout Block D Ground Floor	16191-CPW-D-00-EC-11001	P2	02/07/2019
101	Block D Ground Floor Distribution	16191-CPW-D-00-MC-22001	P2	02/07/2019
102	Proposed Electrical Distribution Layout Block D First Floor	16191-CPW-D-01-EC-11001	P2	02/07/2019
103	LV Tenants & Landlords Switch room Layout Block D	16191-CPW-D-XX-EC-80001	P2	02/07/2019
104	LV Secondary Supply Switch room Layout Block D	16191-CPW-D-XX-EC-80002	P2	02/07/2019
105	Above Ground Drainage Typical Floor Layout Block D	16191-CPW-D-XX-MC-40001	P2	02/07/2019
106	Block D Tank Room Layout	16191-CPW-D-XX-MC-60001	P1	02/07/2019
107	Block D Typical Floor Layout	16191-CPW-D-XX-MC-70001	P2	02/07/2019
108	Blocks E&F Ground Floor Layout	16191-CPW-EF-00-MC-22001	P2	02/07/2019
109	Proposed Riser Locations Typical Floor Layout Blocks E&F	16191-CPW-EF-XX-MC-70001	P2	02/07/2019

4 Basis & Assumptions

Ref	Drawing Name	Reference	Revision	Date Received
110	Above Ground Drainage Typical Floor Layout Block E	16191-CPW-E-XX-MC-40001	P2	02/07/2019
111	Above Ground Drainage Typical Floor Layout Block F	16191-CPW-F-XX-MC-40001	P2	02/07/2019
112	Proposed Electrical Distribution Layout Leisure Centre Ground Floor	16191-CPW-LC-00-EC-11001	P2	02/07/2019
113	Proposed Electrical Distribution Layout Leisure Centre First Floor	16191-CPW-LC-01-EC-11001	P2	02/07/2019
114	Proposed Electrical Distribution Layout Leisure Centre Second Floor	16191-CPW-LC-02-EC-11001	P2	02/07/2019
115	Typical apartment layout combined services 3 bed	16191-CWP-XX-XX-50001	P1	02/07/2019
116	Typical apartment layout combined services 2 bed	16191-CWP-XX-XX-50002	P1	02/07/2019
117	Typical apartment layout combined services 1 bed	16191-CWP-XX-XX-50003	P1	02/07/2019
118	Typical apartment layout combined corridor	16191-CWP-XX-XX-50004	P1	02/07/2019
119	Typical domestic water riser	16191-CWP-XX-XX-SEC01	P1	02/07/2019
120	Combined Domestic Water and Sprinkler Schematic – Block A	CPW-16191-A-XX-MC-02001	P1	02/07/2019
121	LTHW Heating Schematic – Block A	CPW-16191-A-XX-MC-02002	P2	02/07/2019
122	Combined Domestic Water and Sprinkler Schematic – Block B	CPW-16191-B-XX-MC-02001	P1	02/07/2019
123	LTHW Heating Schematic – Block B	CPW-16191-B-XX-MC-02002	P2	02/07/2019
124	Combined Domestic Water and Sprinkler Schematic – Block C	CPW-16191-C-XX-MC-02001	P1	02/07/2019
125	LTHW Heating Schematic – Block C	CPW-16191-C-XX-MC-02002	P2	02/07/2019
126	Combined Domestic Water and Sprinkler Schematic – Block D	CPW-16191-D-XX-MC-02001	P1	02/07/2019
127	LTHW Heating Schematic – Block D	CPW-16191-D-XX-MC-02002	P2	02/07/2019
128	Site-Wide HV Schematic	CPW-16191-E-010-XX-01	P2	02/07/2019
129	Low Voltage Distribution Schematic Leisure Centre	CPW-16191-E-010-XX-02	P2	02/07/2019
130	Low Voltage Distribution Schematic Block C High Rise	CPW-16191-E-010-XX-05	P2	02/07/2019
131	Low Voltage Distribution Schematic Podium West C	CPW-16191-E-010-XX-06	P2	02/07/2019
132	Low Voltage Distribution Schematic Block D High Rise	CPW-16191-E-010-XX-07	P2	02/07/2019
133	Low Voltage Distribution Schematic Podium West D	CPW-16191-E-010-XX-08	P2	02/07/2019
134	Low Voltage Distribution Schematic Block E High Rise	CPW-16191-E-010-XX-09	P1	02/07/2019
135	Low Voltage Distribution Schematic Podium East	CPW-16191-E-010-XX-10	P2	02/07/2019
136	Combined Domestic Water and Sprinkler Schematic – Blocks E&F	CPW-16191-EF-XX-MC-02001	P1	02/07/2019
137	LTHW Heating Schematic – Block EF	CPW-16191-EF-XX-MC-02002	P2	02/07/2019
138	Incoming M&E Services Layout	CPW-16191-ME-EXT-XX-01-P2	P2	02/07/2019
139	Typical HIU apartment schematic	CPW-16191-XX-MC-02002	P2	02/07/2019
140	Typical Dry Riser Schematic	CPW-16191-XX-XX-MC-02001	P2	02/07/2019
141	Typical residential utility cupboard with HIU & MVHR	N/A	Issue A	02/07/2019
	Additional Reports for Planning			02/07/2019
142	Gurnell - Sustainability Statement	N/A	D	02/07/2019
143	Gurnell - Ventilation Extract Details Report	N/A	D	02/07/2019
144	Gurnell DAS - CPW Input	N/A	D	02/07/2019

4 Basis & Assumptions

Ref	Drawing Name	Reference	Revision	Date Received
	Energy Assessment Report Data			02/07/2019
145	Gurnell - Energy Assessment - London Plan - Rev E			02/07/2019
146	gla_carbon_emission_reporting_spreadsheet_blocks A-C 19.03.2019	N/A	Issue 1.1	02/07/2019
147	gla_carbon_emission_reporting_spreadsheet_blocks D-F 19.03.2019	N/A	Issue 1.1	02/07/2019
148	GURNELL LEISURE CENTRE CLEAN_brukl (2)	N/A	N/A	02/07/2019
149	GURNELL LEISURE CENTRE GREEN_brukl	N/A	N/A	02/07/2019
150	GURNELL LEISURE CENTRE LEAN_brukl	N/A	N/A	02/07/2019
151	Gurnell_LC_gla_carbon_emission_reporting_spreadsheet_v1.1	N/A	v.1.1	02/07/2019
152	Overheating Results 2020 DSY 1	N/A	N/A	02/07/2019
153	Overheating Results 2020 DSY 2	N/A	N/A	02/07/2019
154	Overheating Results 2020 DSY 3	N/A	N/A	02/07/2019
155	Overheating Results current DSY 1	N/A	N/A	02/07/2019
156	Overheating Results current DSY 2	N/A	N/A	02/07/2019
157	Overheating Results current DSY 3	N/A	N/A	02/07/2019
158	TM59 Result 03 AB	N/A	N/A	02/07/2019
159	TM59 Result 03 CDEF	N/A	N/A	02/07/2019
	Updated Stage 2 Report			02/07/2019
160	16191 - STAGE 2 REPORT	16191 Stage 2 Report	P4	02/07/2019
	Leisure Centre			02/07/2019
161	Combined Services Layout Ground Floor	16191-CPW-LC-00-BS-50001	P2	02/07/2019
162	Proposed Mechanical Philosophy Ground	16191-CPW-LC-00-MC-1001	P1	02/07/2019
163	Mechanical Ventilation Layout Ground Floor	16191-CPW-LC-00-MC-11001	P2	02/07/2019
164	Combined Pipework Ground Floor	16191-CPW-LC-00-MC-22001	P2	02/07/2019
165	Combined Services Layout First Floor	16191-CPW-LC-01-BS-50001	P2	02/07/2019
166	Proposed Mechanical Philosophy First	16191-CPW-LC-01-MC-1001	P1	02/07/2019
167	Mechanical Ventilation Layout First Floor	16191-CPW-LC-01-MC-11001	P2	02/07/2019
168	Combined Services Layout Second Floor	16191-CPW-LC-02-BS-50001	P2	02/07/2019
169	Proposed Mechanical Philosophy Second	16191-CPW-LC-02-MC-1001	P1	02/07/2019
170	Mechanical Ventilation Layout Second Floor	16191-CPW-LC-02-MC-11001	P2	02/07/2019
171	Combined Services Layout Basement	16191-CPW-LC-B1-BS-50001	P2	02/07/2019
172	Mechanical Ventilation Layout Basement Level	16191-CPW-LC-B1-MC-11001	P2	02/07/2019
173	Combined Pipework Basement	16191-CPW-LC-B1-MC-22001	P2	02/07/2019
174	Mechanical Ventilation Layout Roof Level	16191-CPW-LC-RL-MC-11001	P2	02/07/2019
175	Energy Centre Layout	16191-CPW-LC-XX-MC-60001	P2	02/07/2019
176	LC Tank Room	16191-CPW-LC-XX-MC-60002	P1	02/07/2019
177	Mechanical Ventilation Detail Section	16191-CPW-LC-ZZ-MC-SEC01	P2	02/07/2019

4 Basis & Assumptions

Ref	Drawing Title	Reference	Revision	Date Received
178	Basement Car Park Above Ground Drainage Strategy	16191-CPW-XX-XX-D-01	P1	02/07/2019
179	Car Park Ventilation Basement Sketch - NSP	180237-3DR-XX-B-SK-00371	RevB	02/07/2019
180	Main Pool and Fun Pool Ventilation System Schematic	CPW-16191-LC-XX-MC-01001	P1	02/07/2019
181	Wet Changing Room Areas Ventilation Schematic	CPW-16191-LC-XX-MC-01002	P1	02/07/2019
182	GymStudio and Dry Changing Room Ventilation Schematic	CPW-16191-LC-XX-MC-01003	P1	02/07/2019
183	Foyer & Cafe Areas Ventilation Schematic	CPW-16191-LC-XX-MC-01004	P1	02/07/2019
184	Leisure Centre Domestic Water Schematic -Sheet 1 of 2	CPW-16191-LC-XX-MC-02001	P1	02/07/2019
185	Leisure Centre Domestic Water Schematic -Sheet 2 of 2	CPW-16191-LC-XX-MC-02002	P1	02/07/2019
186	Primary Heating (Energy Centre) Schematic	CPW-16191-LC-XX-MC-02003	P2	02/07/2019
187	Leisure Centre LTHW Secondary Schematic	CPW-16191-LC-XX-MC-02004	P2	02/07/2019
188	Pool ventilation slot diffuser information	CPW-16191-M	N/A	02/07/2019
Landscaping				
183	Level 06 Roof Plan	1277-HED-CD-06-GA-L-1200	P01	02/07/2019
184	Drawing Schedule	1277-HED-Document-Schedule - Stage 2	N/A	02/07/2019
185	General Arrangement Key Plan	1277-HED-MP-00-GA-L-1101	P01	02/07/2019
186	General Arrangement Plan Sheet 1	1277-HED-MP-00-GA-L-1102	P01	02/07/2019
187	General Arrangement Plan Sheet 2	1277-HED-MP-00-GA-L-1103	P01	02/07/2019
188	General Arrangement Plan Sheet 3	1277-HED-MP-00-GA-L-1104	P01	02/07/2019
189	General Arrangement Plan Sheet 3	1277-HED-MP-00-GA-L-1400	P01	02/07/2019
190	Tree Retained and Removal Plan	1277-HED-MP-00-GA-L-1500	P01	02/07/2019
191	Typical Section (Street Level)	1277-HED-MP-00-SE-L-4101	P01	02/07/2019
192	Landscape Outline Specification	1277-HED-MP-00-SP-L-6000	P01	02/07/2019

4 Basis & Assumptions

4.2 Assumptions

4.2.1 Procurement

Assume single stage design and build procurement route
No allowance has been made for a negotiated tender process
Prices do not reflect Framework procured contractors

4.2.2 Areas

Areas have been measured from the above drawings in line with current NRM1 standards - where drawings/details have not been provided areas stated in the 3D Reid area schedule have been used i.e. the basement car park area

A basement area includes all pool, plant and carparking areas shown at level -1

4.2.3 Inflation - A start on site of Q4 2020, inflation currently excluded

4.2.4 Phasing - Prices reflect stand alone development, no phasing allowance included

4.2.5 Residential Fitout - 'The current fitout cost for £/ft2 (NIA) is £100/ft2. this is deemed to be achievable based on a blended sales value of £550/ft2.

4.2.6 Substructure - 'A piled foundation solution is to be used

4.2.7 Structure:

A steel framed structure is to be used for the leisure centre development
A requirement for treatment to steel in pool areas

4.2.8 Facades:

Residential- assumed handset brickwork and aluminium windows
Leisure - assumed handset brickwork, aluminium panels and transparent glazing
The current blended rate for the residential facade is circa £640/m2

4.2.9 Landscaping - assume majority soft landscaping to zone one only, mature trees assumed to be retained

4.2.10 Furniture, Fittings and Equipment

Client direct FF&E has been excluded until further detail can be provided
Climbing wall equipment; only space/blockwork provided by the Contractor; specialist installation included within Client FF&E budget
Pool cover - assumed covered by Client FF&E budget
Allowance made for feature lighting to pool areas

4.3 Ecoworld Interface Adjustment Assumptions

4.3.1 Assumed EWL providing all substructure including piling, pile caps, capping beams, basement slab and ground floor slab/basement lid

4.3.2 Assumed EWL providing basement retaining wall and cavity drainage

4.3.3 Assumed EWL providing all structural columns within basement box

4.3.4 Assumed EWL providing all RC core walls and stairs to basement box

4.3.5 Assumed EWL providing structure for main pool

4 Basis & Assumptions

4.4 Mechanical and electrical Assumptions

- 4.4.1 This Cost Model is based upon an indicative Core 5 outline cost specification.
- 4.4.2 Based on sprinklered and Dry risers to the Residential buildings and Dry Risers to the Leisure centre
- 4.4.3 Comfort cooling is excluded to resi apartments
- 4.4.4 Cooling to Leisure Centre is only to selected areas and via varied systems
- 4.4.5 Security excluded from apartments, refer risk schedule
- 4.4.6 CCTV & Access Control allowances made to perimeter, entrances and select areas within each building only
- 4.4.7 Refer risk schedule for additional compliance with Secure by Designs
- 4.4.8 Mobile boosters (DAS) excluded
- 4.4.9 Satellite TV (Sky+) included but no decoders
- 4.4.10 Pre-wire for the Blinds and Speakers excluded to resi and leisure
- 4.4.11 Home Network/Automation equipment excluded
- 4.4.12 Mood lighting/dimming (Lutron type refers) to apartments excluded
- 4.4.13 No allowance for converged network systems (CNS)
- 4.4.14 Apartment ventilation based on MVHR
- 4.4.15 No allowance for surface water or underground drainage
- 4.4.16 Apartment wiring based on PVC/PVC cables with protection on the drops only
- 4.4.17 No allowance for refuse chute
- 4.4.18 Budget allowance for whole of external security/CCTV - £60,000
- 4.4.19 Budget allowance for external/feature lighting - £110,000
- 4.4.20 Petrol Interceptor include to basement only
- 4.4.21 It is assumed that the MEP design complies with achieving 35% carbon tax
- 4.4.22 No allowance for re-enforcements or temporary utilities
- 4.4.23 Utility diversions excluded
- 4.4.24 No allowance for waste compactors or associated lifts
- 4.4.25 No allowance for incoming telephones other than ducts
- 4.4.26 Automatic Roller Shutter Doors excluded
- 4.4.27 Procurement route based on single stage lump sum, refer risk schedule for 2 stage
- 4.4.28 No compliance with TM59 included, refer risk schedule
- 4.4.29 SAP10 compliance excluded, i.e. electric heating
- 4.4.30 Carbon tax calculation is indicative and based on the 2019 London Plan @ £95 a ton
- 4.4.31 No allowance has been made for leak detection to and in apartments, refer risks
- 4.4.32 BMS (controls) to central plant only
- 4.4.33 Energy centre work are based on ASHP and Full Gas boilers as back-up. As per design notes.
- 4.4.34 Only full filtration equipment and plant have been allowed for within MEP costs. No structure and or building works.
- 4.4.35 Car park areas are smoke extracted and fully sprinkler
- 4.4.36 No DHN and or utilities distribution works have been included to future development blocks.
- 4.4.37 NOx filtration works have been excluded from apartments

5 Exclusions

5 Exclusions

		Excluded (X) from Cost Model	Owner	Indicative Budget Provision (TBC)
The following are excluded from this Cost Estimate but are known to have a cost impact therefore need to be covered by other budgets in the overall Project Budget. The list is intended only as a guide and cannot be relied upon to be exhaustive.				
1	Client direct costs including - legal fees; Local Authority fees; permits; statutory fees; site surveys; monitoring costs; environmental audits; wind studies; commissioning manager fee; third party fees/costs and all client soft costs	X	Client	
2	External Works and Landscaping allowances have been excluded until further information is available	X	Client	
3	Capital allowances or other incentives/grants	X	Client	
4	Taxes and VAT	X	Client	
5	Adjoining owner negotiations	X	Client	
6	Project insurances (costs include allowances for Main Contractor's Third Party and Works insurance only)	X	Client	
7	Site acquisition fees/costs, air rights, rights to light (or any other third party compensation settlements), over sailing licenses, sale or letting fees/costs and other developer's costs)	X	Client	
8	1. Excluded are potential extreme impacts of a "no deal" Brexit, these include but are not limited to: a. Border/customs issues or significant delays affecting the import of materials from overseas b. Civil unrest/Union activity c. Supplier restrictions, trade tariffs or significant restrictions on the import of products from the EU which may limit competition of key products (e.g. cladding, bathroom pods etc.)	X	Client	
9	Audits (environmental, traffic, disability, wind, acoustics etc.)	X	Client	
10	Marketing and PR costs	X	Client	
11	Finance costs and Capital Contributions to third parties or authorities	X	Client	
12	Section 106 and 278 works, cil payments	X	Client	
13	Rights of Light	X	Client	
14	Site, building or other surveys, including statutory service investigations	X	Client	
15	Feature hoarding	X	Client	
16	Public artwork	X	Client	
17	Fixtures, Furnishings and Equipment to apartments	X	Client	
18	Design fees including those within any D&B Construction contract	X	Client	
19	Phasing / sectional completion costs e.g. temporary works, temporary external works, additional preliminaries, security etc.	X	Client	
14	Works beyond the limited external works/landscaping noted in the costs	X	Client	

The following risk items are excluded, but may result in additional cost and needs to be managed through the project risk strategy				
1	Cost escalation as a result of abnormal market price fluctuations	X	Risk/Client	
2	Flood impact measures	X	Risk/Client	
3	Utilities reinforcement	X	Risk/Client	
4	Excavation and removal of contaminated material, in excess of the associated inert/non-hazardous allowances indicated.	X	Risk/Client	
5	Asbestos removal from existing buildings over and above planning application cost plan allowances	X	Risk/Client	
6	Landfill tax incurred from the disposal of any contaminated (Hazardous or Non Hazardous) material disposal	X	Risk/Client	
7	Impact of any discovered UXO removal of unexploded ordinance	X	Risk/Client	
8	Archaeology works (including Consultants fees, investigation and attendance costs or resultant delays/disruption)	X	Risk/Client	
9	Fire rating or bomb blast specification or bomb film to external perimeter glazing	X	Risk/Client	
10	Any necessary off-site reinforcement of services infrastructure	X	Risk/Client	
11	Out of hours working	X	Risk/Client	
12	Effects of working condition restrictions, such as Environmental Management plans	X	Risk/Client	
13	Changes to statutory authorities or buildings regulations	X	Risk/Client	
14	Ecology/UXO;	X	Risk/Client	
The following items are also excluded, but may result in additional cost and should therefore be covered by separate budgets where appropriate				
1	Blinds to elevations	X	X	
2	Waste bins / recycling bins / refuse compactors	X	X	
3	Internal Planting and the like	X	X	
4	All signage and directories except statutory signage	X	X	
5	Cost of project collaboration tools	X	X	
6	Façade cleaning systems to non-tower buildings (included to towers only)	X	X	
7	Works to Arches - with the exception of landscape works (i.e. no structural works or finishes)	X	X	
8	Non competitive Procurement (competitive assumed)	X	X	
9	Cut and fill allowances; it is assumed that the site is generally flat	X	X	
10	'Power distribution onto Office floors and connection to floor boxes (provided by the Developer)' - Assumed C	X	X	
11	Car lifts	X	X	
12	Cooling to Social rented/Intermediate	X	X	
13	Home Automation to Private Apartments	X	X	
14	Carbon Tax Allowance	X	X	

6 Area Schedule

Gurnell Leisure Redevelopment - Leisure Centre and Residential Blocks A and B

Cost Estimate DRAFT



6 Area Schedule

Blocks	3D Reid (P07) 01/10/18		Ecoworld 12/02/19		Core Five Measure 05/07/19		NIA Variance C5 Feb 2019 Vs Ecoworld 12/02/19	GIA Variance C5 Feb 2019 Vs Ecoworld 12/02/19	% Difference	C5 Comments
	TOTAL NIA m²	TOTAL GIA m²	TOTAL NIA m²	TOTAL GIA m²	TOTAL NIA m²	TOTAL GIA m²				
Block A & B (BTR)	11,393	15,471	11,393	16,058	11,876	16,096	483	38	0%	Energy centre included, Ecoworld to confirm allocation
Leisure	7,045	7,781	7,427	7,427	7,703	8,210	276	783	10%	key difference in basement, see basement measure at back of document
Basement	7,310	7,471	2,960	15,804	2,668	12,697	(291)	(3,107)	-24%	See Basement breakdown tab. Please note that the Leisure NIAs are not on the recent Ecoworld area schedule.
TOTAL (m²)	25,748	30,723	46,347	39,289	22,248	37,003	1,236	952	3%	
TOTAL (ft²)	277,153	330,700	498,879	422,903	239,474	398,299	13,303	10,246	3%	

Gurnell Leisure Redevelopment - Leisure Centre and Residential Blocks A and B

Cost Estimate DRAFT



6 Area Schedule

Block A & B	3D Reid 01/10/18		Ecoworld 12/02/19		Core Five Measure 05/07/19		NIA Variance C5 vs Ecoworld	GIA Variance C5 vs Ecoworld	% Difference	C5 Comments
	TOTAL NIA m²	TOTAL GIA m²	TOTAL NIA m²	TOTAL GIA m²	TOTAL NIA m²	TOTAL GIA m²				
Basement	-	-	-	-	-	-	-	-		
GF	-	547	-	819	-	581	-	(237)	-40%	Ecoworld may have included part of the energy centre- this is captured within the leisure areas
Level 01	429	684	429	757	415	705	(14)	(52)	-8%	Void over soft play area measures approx.78m2 and void over café measures 69m2 so one of these may be included in Ecoworld measures
Level 02	429	684	429	757	415	669	(14)	(89)	-13%	Void over soft play area measures approx.78m2 and void over café measures 69m2 so one of these may be included in Ecoworld measures
Level 03	429	684	429	757	415	669	(14)	(89)	-13%	Void over soft play area measures approx.78m2 and void over café measures 69m2 so one of these may be included in Ecoworld measures
Level 04	438	684	438	757	415	669	(23)	(89)	-13%	Void over soft play area measures approx.78m2 and void over café measures 69m2 so one of these may be included in Ecoworld measures
Level 05	1,027	1,286	1,027	1,289	1,022	1,280	(5)	(9)	-1%	
Level 06	1,027	1,286	1,027	1,289	1,022	1,280	(5)	(9)	-1%	
Level 07	1,027	1,286	1,027	1,289	1,022	1,280	(5)	(9)	-1%	
Level 08	1,027	1,286	1,027	1,289	1,022	1,280	(5)	(9)	-1%	
Level 09	1,027	1,286	1,027	1,289	1,022	1,280	(5)	(9)	-1%	
Level 10	1,027	1,286	1,027	1,289	1,022	1,280	(5)	(9)	-1%	
Level 11	1,027	1,286	1,027	1,289	1,022	1,280	(5)	(9)	-1%	
Level 12	1,027	1,286	1,027	1,289	1,022	1,280	(5)	(9)	-1%	
Level 13	1,027	1,286	1,027	1,289	1,022	1,280	(5)	(9)	-1%	
Level 14	425	614	425	610	1,022	1,280	597	671	109%	Only Block A counted by Ecoworld, current design shows both blocks to 14th floor
Roof	-	-	-	-	-	-	-	-		
TOTAL (m²)	11,393	15,471	11,393	16,058	11,876	16,096	483	38	0%	
TOTAL (ft²)	122,634	166,530	122,634	172,844	127,836	173,252	5,202	408		

Gurnell Leisure Redevelopment - Leisure Centre and Residential Blocks A and B

Cost Estimate DRAFT



6 Area Schedule

	3D Reid 01/10/18		Ecoworld 12/02/19		Core Five Measure 05/07/19		NIA Variance	GIA Variance
	TOTAL NIA m²	TOTAL GIA m²	TOTAL NIA m²	TOTAL GIA m²	TOTAL NIA m²	TOTAL GIA m²		
Leisure								
GF	3,358	3,410	3,422	3,422	3,390	3,716	(32)	294
Level 01	2,050	2,127	2,302	2,302	2,030	2,138	(272)	(163)
Level 02	1,637	2,244	1,704	1,704	2,284	2,355	580	652
TOTAL (m²)	7,045	7,781	7,427	7,427	7,703	8,210	276	783
TOTAL (ft²)	75,835	83,753	79,947	79,947	82,915	88,374	2,968	8,427

% Difference	C5 Comments
8%	Does not include main pool area, includes fun pool as assumed to be on GF, includes energy centre. The fun pool measures approx. 328m2 which may explain the variance.
-8%	Roof/Void included in Ecoworld quantity - void over Foyer measures approx. 146m2 and void over Café & Soft Play Area also measures approx. 146m2- so either the Foyer or Café & Soft Play Area may be included.
35%	Ecoworld to confirm if core area next to block B is included (approx. 136m2)
10%	Ecoworld to confirm above ground LC area as 7,427m2

	3D Reid 01/10/18		Ecoworld 12/02/19		Core Five Measure 05/07/19		NIA Variance	GIA Variance
	TOTAL NIA m²	TOTAL GIA m²	TOTAL NIA m²	TOTAL GIA m²	TOTAL NIA m²	TOTAL GIA m²		
Leisure								
Basement	7,310	7,471	2,960	15,804	2,668	12,697	(291)	(3,107)
TOTAL (m²)	7,310	7,471	2,960	15,804	2,668	12,697	(291)	(3,107)
TOTAL (ft²)	78,684	80,418	31,858	170,111	28,723	136,672	(3,136)	(33,439)

% Difference	C5 Comments
-24%	See Basement breakdown tab. Please note that the Leisure NIAs are not on the recent Ecoworld area schedule.

TOTAL (m²)	18,438	23,252	21,780	39,289	22,248	37,003	468	(2,286)
TOTAL (ft²)	198,469	250,282	234,440	422,903	239,474	398,299	5,034	(24,604)

NOTES

- 1) Areas have been measured from the design information provided as noted in section 4.0
- 2) Areas have been measured in accordance with the RICS Code of Measurement Practice, 6th edition.
- 3) Areas noted as NIA do not necessarily equate to net lettable / effective lettable / usable areas.
- 4) The areas included within this document should not be relied upon for any other purpose than the formulation of the cost models themselves.
- 5) Balconies & Terraces are excluded from GIA.

Appendix A: Basement Cost Estimate

Appendix A: Basement Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
1.0	Demolitions & Site Clearance	136,672		8	1,050,000
1.1	Site Clearance Leisure	14,000	m ²	75	1,050,000
2.0	Substructure NB: Cost Apportioned based on overall GIA (ft2)	136,672		15	2,110,000
2.1	Obstructions/Contamination (allowance) Leisure	1	item	50,000	50,000
2.2	Excavate Basements (4.2m max depth)	53,328	m ³	12	639,936
2.3	Excavate Basements Lift Pits(1.5m deep)	54	m ³	8	432
2.4	Allowance EWS	2,527	m ²	20	50,549
2.5	Disposal of Inert Excavated Material Leisure	53,382	m ³	35	1,868,371
2.6	600mm dia CFA Pile to approx. 20m Depth	1,320	m	100	132,000
2.7	600mm dia CFA Pile to approx. 20m Depth	3,925	m	110	431,750
2.8	750mm dia CFA Pile to approx. 25m Depth	5,260	m	135	710,100
2.9	750mm dia CFA Pile to approx. 25m Depth	1,900	m	135	256,500
2.10	900mm dia CFA Pile to approx. 20m Depth	220	m	180	39,600
2.11	900mm dia CFA Pile to approx. 22m Depth	88	m	180	15,840
2.12	900mm dia CFA Pile to approx. 25m Depth	2,600	m	180	468,000
2.13	Mobilisation	1	Item	25,000	25,000
2.14	Decant from Site Leisure	1	Item	25,000	25,000
2.15	Setting Out pile	681	nr	20	13,620
2.16	Allowance for probing piles	681	nr	20	13,620
2.17	Integrity Pile Testing	681	nr	25	17,025
2.18	Concrete Cube Testing	681	nr	15	10,215
2.19	Piling Design Leisure	1	Item	5,000	5,000
2.20	Disposal of Pile Spoil (inert)	11,134	m ³	12	133,610
2.21	Pile cap: TYPE A 3300 x 1050 x 900 DP PILE CAP, 2No 750 Ø PILES	84	nr	2,200	184,800
2.22	Pile cap: TYPE B 3300 x 3300 x 900 DP PILE CAP, 4No 750 Ø PILES	24	nr	4,500	108,000
2.23	Pile cap: TYPE C 3300 x 900 DP TRIANGULAR CAP, 3No 750 Ø PILES	12	nr	3,000	36,000

Appendix A: Basement Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
2.24	Pile cap: TYPE D 2700 x 900 x 900 DP PILE CAP, 2No 600 Ø PILES	72	nr	2,000	144,000
2.25	Pile cap: TYPE E 5550 x 3300 x 900 DP PILE CAP, 6No 750 Ø PILES	2	nr	5,300	10,600
2.26	Pile cap: TYPE F 3900 x 1200 x 900 DP PILE CAP, 2No 900 Ø PILES	8	nr	2,200	17,600
2.27	Pile cap: TYPE G 900 x 900 x 900 DP PILE CAP, 1No 600 Ø PILE	3	nr	1,200	3,600
2.28	Pile cap: TYPE H 9300 x 1200 x 900 DP PILE CAP, 2No 900 Ø PILES	1	nr	7,000	7,000
2.29	Pile cap: TYPE J 6600 x 3900 x 900 DP PILE CAP, 6No 900 Ø PILES	3	nr	6,800	20,400
2.30	Pile cap: TYPE K 3900 x 3900 x 900 DP PILE CAP, 4No 900 Ø PILES	4	nr	4,500	18,000
2.31	Cut off top of piles	681	nr	65	44,265
2.32	Ground beam say 450mm wide 500mm deep to perimeter Basement	121	m ³	160	19,359
2.33	Ground beam say 450mm wide 500mm deep to perimeter Main Pool	34	m ³	160	5,400
2.34	Ground beam say 450mm wide 500mm deep to perimeter Fun Pool	16	m ³	160	2,592
3.1	Retaining Wall Reinforced Concrete (waterproof)	592	m ²	300	177,461
3.2	Rebar @ 140kg/m3	83	tn	1,200	99,378
3.3	Formwork	2,366	m ²	50	118,307
3.4	Allowance for cavity drainage system to Basement Walls only	2,527	m ²	25	63,187

Appendix A: Basement Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
3.0	Frame	136,672		55	7,570,000
3.5	Allowance for basement slab; 375mm thick	12,697	m ²	250	3,180,000
3.6	Allowance for ramp	1	item	150,000	150,000
3.7	Allowance for suspended Ground Slab; 400mm thick	12,697	m ²	300	3,810,000
3.8	Allowance for Steps in Slab	1	item	20,000	20,000
3.9	Column type CC 01 1500x300	115	nr	1,200	140,000
3.10	Column type CC 02 2000x450	14	nr	2,000	30,000
3.11	Column type CC 03 3000x450	3	nr	2,500	10,000
3.12	Column type CC 04 600 x400	4	nr	1,000	10,000
3.13	Column type CC 05 900x400	10	nr	1,200	20,000
3.14	Column type CC 06 1000x250	7	nr	900	10,000
3.15	Column type CC 07 700x400	5	nr	750	10,000
3.16	Column type CC 09 500x400	33	nr	700	30,000
3.17	Allowance for Core Walls	744	m ²	200	150,000
3.18	Allowance for formation of pools				Included in leisure
4.0	Upper Floors	136,672		-	0
5.0	Roof	136,672		-	0
6.0	Stairs	136,672		1	75,000
6.1	Precast concrete stairs; including finishes, nosing's, handrails and balustrading	5	nr	15,000	75,000
7.0	External Walls & Windows	136,672		-	0

Appendix A: Basement Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
8.0	External Doors	136,672		-	0
9.0	Internal Walls & Partitions	136,672		9	1,230,000
9.1	Allowance for Concrete Wall Lining to internal face of secant wall	6,644	m ²	100	664,436
9.2	Waterproofing to vertical face of secant pile wall	6,644	m ²	60	398,662
9.3	Allowance for internal walls to basement	1,632	m ²	100	163,200
10.0	Internal Doors	136,672		0	60,000
10.1	Allowance for double leaf doors	15	nr.	2,500	37,500
10.2	Allowance for additional doors	1	Item	25,000	25,000
11.0	Floor Finishes	136,672		4	520,000
11.1	Allowance for dust sealer to basement areas	12,697	m ²	15	190,457
11.2	Allowance for concrete sealer finish to stair cores and plant rooms	2,668	m ²	50	133,420
11.3	Allowance for tiling to pool area			included in leisure cost estimate	
11.4	Allowance for line painting to carpark: Car park area	10,029	m ²	20	200,575
12.0	Wall Finishes	136,672		1	170,000
12.1	Allowance for paint finish to walls in basement	11,396	m ²	15	170,945
12.2	Allowance for dust sealer to basement walls				0
13.0	Ceiling Finishes	136,672		1	130,000
13.1	Allowance for dust sealer, painted exposed concrete	12,697	m ²	50	133,420
13.2	Allowance for ceiling in stair cores				Excluded

Appendix A: Basement Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
14.0	Fixtures & Fittings	136,672		1	150,000
14.1	Allowance for signage	1	item	20,000	20,000
14.2	Allowance for Bicycle storage	352	nr	350	123,200
14.3	Allowance for grills/open mesh to car park ventilation (scope to be advised)	1	item	10,000	10,000
14.4	Allowance for car lift	0	item	-	0
14.5	Parking management system and access/egress barriers t ramp	1	item	30,000	30,000
14.6	Car Park - vehicle crash barriers to columns, walls etc	1	item	75,000	75,000
14.7	Car Park - vehicle crash barriers to columns, walls etc	1	item	75,000	75,000
14.8	Security Fence to Split Car park	1	item	12,000	12,000
14.9	Security Roller shutter to Resi Cr Park Entrance	1	item	10,000	10,000
14.10	Security rising Bollard	1	item	10,000	10,000
14.11	General Signage allowance to Resi	0	0	-	0
15.0	Services Shell & Core	136,672		26	3,540,000
15.1	Sanitaryware	1	item		0
15.2	Services equipment	1	item		0
15.3	disposals insulation	1	item	365,448	365,448
15.4	water instalations	1	item	14,878	14,878
15.5	heat source	1	item		0
15.6	Space heatinga nd air treatment	1	item	15,113	15,113
15.7	Ventilation systems	1	item	764,566	764,566
15.8	Electrical systems	1	item	958,057	958,057
15.9	Gas Instalations	1	item		0
15.10	Lift Instalations	1	item		0
15.11	Protective instalations	1	item	324,925	324,925
15.12	Communications	1	item	1,005,228	1,005,228
15.13	Specalist Instalations	1	item	92,418	92,418
15.14	BWIC	1	item		0

Appendix A: Basement Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
16.0	Services Fitout	136,672		-	0
29.0	Renewables	136,672		-	0
32.0	External Services	136,672		38	5,160,000
	Allowance for energy centre. NB: Energy centre will serve BTR, Leisure and OMS units				5,158,056
33.0	External Works	136,672			0
33.1	Allowance for external works & landscaping				Excluded
33.2	Allowance for diversions, overflow sewer manhole relocation, etc.				Excluded

Appendix A: Basement Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
	SUB TOTAL	136,672		159	21,770,000
	Main Contractor Preliminaries	16%			3,480,000
	Overheads & Profit	4%			1,010,000
	Contractor (D&B) Risk	2%			Excluded
	Client FF&E - Allowance				Excluded
	Allowance for Out-Turn Inflation; Assumed Start on Site Q4 2020	5%			Excluded
	TOTAL	136,672		190	26,260,000

Appendix B: Leisure Cost Estimate

Appendix B: Leisure Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
1.0	Demolitions & Site Clearance	88,374		-	0
1.1				Included in Basement estimate	
2.0	Substructure - Leisure specific	88,374		24	2,080,000
2.1	Extra over; formation of staircase bases	4	nr	2,500	10,000
2.2	Formation of ductwork around pool perimeters	222	m	170	37,740
2.3	Formation of pool area to slab: 375mm thick	1,578	m ²	250	394,525
2.4	Waterproof reinforced concrete walls to pool sides; incl formwork	755	m ²	200	150,960
2.5	Extra over for waterproofing pool base slabs	1,578	m ²	30	47,343
2.6	Under slab drainage	1,578	m ²	15	23,671
2.7	Extra over; under slab drainage for pools	1	item	50,000	50,000
3.0	Frame	88,374		22	1,960,000
3.1	Allowance for structural steel	458	tn	2,500	1,145,000
3.2	Allowance for core walls	280	m ²	200	56,000
3.3	Allowance for lightweight frame to façade	3,911	m ²	150	586,650
3.4	Intumescent paint/fire protection	2,270	m	75	170,250
4.0	Upper Floors	88,374		11	1,003,000
4.1	Slab Concrete (250mm thick)	1,123	m ³	180	202,221
4.2	Rebar @ 240kg/m ³	270	tn	1,100	296,591
4.3	Formwork	4,494	m ²	40	179,752
4.4	Upstands etc say 2% of GF Slab to have Superstructure over	22	m ³	1,100	24,716
4.5	Allowance for spectator seating	1	item	300,000	300,000

Appendix B: Leisure Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
5.0	Roof	88,374		15	1,340,000
5.1	Allowance for roof structure	4,393	m ²	150	658,950
5.2	Roof coverings	4,393	m ²	120	527,160
5.3	Allowance for roof lights				Excluded
5.4	Rainwater installation	1	item	50,000	50,000
5.5	Roof access hatches	1	item	25,000	25,000
5.6	Mansafe system	1	item	50,000	50,000
5.7	Main entrance canopy	1	item	25,000	25,000
6.0	Stairs	88,374		2	190,000
6.1	Precast concrete stairs; including finishes, nosing's, handrails and balustrading	12	nr	15,000	180,000
6.2	Roof access ladders	1	item	10,000	10,000
7.0	External Walls & Windows	88,374		27	2,411,000
7.1	Allowance for an aluminium composite panel	1,847	m ²	400	738,800
7.2	Allowance for handset brick façade	296	m ²	600	177,600
7.3	Allowance for curtain walling	801	m ²	900	720,900
7.4	Allowance for translucent panel system	967	m ²	800	773,600
7.5	Allowance for Broise Soleil fins to upper levels	267	m ²	400	106,604
7.6	Allowance for plant screen	1	item	100,000	100,000

Appendix B: Leisure Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
8.0	External Doors	88,374		0	39,000
8.1	Main entrance doors	1	nr	15,000	15,000
8.2	Allowance for means of escape doors; say	3	nr	2,500	7,500
8.3	Glazed double doors to swimming pool areas	4	nr	4,000	16,000
9.0	Internal Walls & Partitions	88,374		9	760,000
9.1	Allowance for blockwork walls, including fire stopping/head detail; say	1,875	m ²	75	140,591
9.2	Allowance for internal stud partitions; say	1,432	m ²	120	171,843
9.3	Allowance for lining to external walls	1,045	m ²	75	78,349
9.3	Allowance for lift and staircase enclosures; say				Included
9.4	Allowance for glazed partitions; say	216	m ²	650	140,400
9.5	Allowance for lift and stair structures				Included
9.6	Allowance for changing cubicles	108	nr	1,200	129,600
9.7	Allowance for changing cubicles	1	item	100,000	100,000
10.0	Internal Doors	88,374		2	170,000
10.1	Allowance for internal single leaf timber doors; incl ironmongery and framing, say	58	nr	1,600	92,800
10.2	Allowance for internal double leaf timber doors; incl ironmongery and framing, say	16	nr	2,100	33,600
10.3	Allowance for internal single leaf glazed doors; incl ironmongery and framing, say	0	nr	3,000	0
10.4	Allowance for internal double leaf glazed doors; incl ironmongery and framing, say	5	nr	4,000	20,000
10.5	Allowance for riser doors; single, say	1	item	10,000	10,000
10.6	Allowance for shutter to kitchen/café, say	1	item	10,000	10,000

Appendix B: Leisure Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
11.0	Floor Finishes	88,374		8	730,000
11.1	Timber sprung floor; to sports hall, studio, squash courts	1,592	m ²	220	350,270
11.2	Ceramic tiling; screed	2,280	m ²	60	136,827
11.3	Extra over for enhanced tiling to pool areas	1,249	m ²	30	37,474
11.4	Detailing around pool edge; including grating	222	m	200	44,400
11.5	Drainage gullies and grating to wet areas generally	1	item	10,000	10,000
11.6	Vinyl flooring; BOH areas etc	999	m ²	40	39,971
11.7	Carpet tiles or similar	387	m ²	45	17,420
11.8	Dust sealer; to plant areas	1,375	m ²	15	20,628
11.9	Allowance for skirting; generally	1	item	30,000	30,000
11.10	Entrance matting; to main entrance	1	nr	15,000	15,000
11.1	Allowance for feature flooring	1	item	25,000	25,000
12.0	Wall Finishes	88,374		2	210,000
12.1	Emulsion paint	5,345	m ²	12	64,138
12.2	Ceramic tiles	336	m ²	60	20,188
12.3	Mirrored walls; to studios etc	100	m ²	200	19,980
12.4	Concrete finish to plant areas	61	m ²	10	612
12.5	EO allowance for tile to pool areas	469	m ²	60	28,140
12.6	Splashback; to changing/WCs	1	item	25,000	25,000
12.7	Allowance for feature walls	1	item	50,000	50,000

Appendix B: Leisure Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
13.0	Ceiling Finishes	88,374		7	580,000
13.1	Suspended ceilings	4,308	m ²	65	280,037
13.2	Suspended ceilings; moisture resistant	1,359	m ²	100	135,941
13.3	Suspended ceiling to pool hall	921	m ²	120	110,525
13.4	Allowance for bulkheads/edge detail	1	item	20,000	20,000
13.5	Concrete sealer to plant areas/storage	1,345	m ²	20	26,896
13.6	Allowance for finish to stair soffits	1	item	10,000	10,000
14.0	Fixtures & Fittings	88,374		18	1,600,000
14.1	Allowance for changing room benches	1	item	50,000	50,000
14.2	Allowance for changing room lockers	1	item	150,000	150,000
14.3	Allowance for vanity units and mirrors	1	item	50,000	50,000
14.4	Pool ladders/hoist	1	item	75,000	75,000
14.5	Allowance for kitchen units and worktops	1	item	25,000	25,000
14.6	Reception desk	1	item	50,000	50,000
14.7	Turnstiles	1	item	50,000	50,000
14.8	Signage generally; internal	1	item	25,000	25,000
14.9	Signage generally; external	1	item	25,000	25,000
14.10	Allowance for moving pool floors; size & specification TBC	1	item	750,000	750,000
14.11	Allowance for flume	1	item	75,000	75,000
14.12	Allowance for leisure water equipment	1	item	200,000	200,000
14.13	Allowance for building signage	1	item	25,000	25,000
14.14	Allowance for markings to sports hall/squash courts	1	item	30,000	30,000
14.15	Allowance for pool ropes	1	item	25,000	25,000

Appendix B: Leisure Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
15.0	Services Shell & Core	88,374		65	5,730,000
15.1	Sanitaryware	1	item	81,429	81,429
15.2	Services equipment	1	item	34,165	34,165
15.3	disposals insulation	1	item	276,419	276,419
15.4	water instalations	1	item	685,164	685,164
15.5	heat source	1	item	49,991	49,991
15.6	Space heatinga nd air treatment	1	item	1,212,823	1,212,823
15.7	Ventilation systems	1	item	345,278	345,278
15.8	Electrical systems	1	item	1,269,173	1,269,173
15.9	Gas Instalations				
15.10	Lift Instalations	1	item	359,625	359,625
15.11	Protective instalations	1	item	75,164	75,164
15.12	Communications	1	item	915,742	915,742
15.13	Specalist Instalations	1	item	421,898	421,898
15.14	BWIC	1	item	incld	incld

Appendix B: Leisure Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
16.0	Services Fitout	88,374		45	4,020,000
29.0	Renewables	88,374		5	400,000
32.0	External Services	88,374		-	0
					Included in summary
SUB TOTAL		- 88,374		263	23,220,000
	Main Contractor Preliminaries	16%			3,720,000
	Overheads & Profit	4%			1,080,000
	Contractor (D&B) Risk	2%			Excluded
	Client FF&E - Allowance				Excluded
	Allowance for Out-Turn Inflation; Assumed Start on Site Q4 2020	5%			Excluded
TOTAL		88,374		320	28,020,000

Appendix C: Blocks A&B Shell and Core Cost Estimate

Appendix C: Blocks A&B Shell and Core Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
1.0	Demolitions & Site Clearance	173,252		-	0
1.1					
2.0	Substructure	173,252		15	2,673,000
3.0	Frame	173,252		10	1,700,000
3.1	Allowance for core walls	5,173	m ²	200	1,034,600
3.2	Columns				
3.3	L0 RC Column Type - CC 11 900x250	31	nr	1,100	34,100
3.4	L0 RC Column Type - CC 10 600 x250	8	nr	750	6,000
3.5	L0 RC Columns Type - CC 12 700 x 250	12	nr	800	9,600
3.6	L0 RC Columns Type - CC09 500x 400	6	nr	700	4,200
3.7	L1 RC Column Type - CC11 900 x 250	24	nr	1,100	26,400
3.8	L1 RC Column Type - CC 10 600 x 250	10	nr	750	7,500
3.9	L1 RC Column Type - CC 12 700 x 250	13	nr	800	10,400
3.10	L2 RC Column Type - CC11 900 x 250	104	nr	1,100	114,400
3.11	L2 RC Column Type - CC 10 600 x 250	32	nr	750	24,000
3.12	L2 RC Columns Type - CC 12 700 x 250	48	nr	800	38,400
3.13	L5 RC Column Type - CC11 900 x 250	26	nr	1,100	28,600
3.14	L5 RC Column Type - CC 10 600 x 250	8	nr	750	6,000
3.15	L5 RC Column Type - CC 12 700 x 250	11	nr	800	8,800
3.16	L6-13 RC Column Type - CC 12 700 x 250	88	nr	800	70,400
3.17	L6-13 RC Column Type - CC11 900 x 250	208	nr	1,100	228,800
3.18	L6-13 RC Column type - CC 10 600 x 250	64	nr	750	48,000

Appendix C: Blocks A&B Shell and Core Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
4.0	Upper Floors	173,252		23	3,932,000
4.1	FF Suspended Slab Block A				
4.2	Slab Concrete (250mm thk)	3,879	m ³	180	698,140
4.3	Rebar @ 240kg/m ³	930	tn	1,100	1,023,535
4.4	Formwork	15,502	m ²	40	620,071
4.5	Allowance for bot on balconies	212	nr	7,500	1,590,000
5.0	Roof	173,252		3	530,000
5.1	Allowance for roof structure	1,410	m ²	150	211,500
5.2	Roof coverings	1,410	m ²	120	169,200
5.3	Rainwater installation	1	item	50,000	50,000
5.4	Roof access hatches	1	item	25,000	25,000
5.5	Mansafe system	1	item	50,000	50,000
5.6	Main entrance canopy	1	item	25,000	25,000
6.0	Stairs	173,252		3	440,000
6.1	Precast concrete stairs; including finishes, nosing's, handrails and balustrading	28	nr	15,000	420,000
6.2	Roof access ladders	2	nr	10,000	20,000

Appendix C: Blocks A&B Shell and Core Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
7.0	External Walls & Windows	173,252		31	5,348,000
7.1	Solid brick façade; assumed handset brick	4,316	m ²	650	2,805,400
	Allowance for glazing to apartments: assumed aluminium openable windows only	3,283	m ²	600	1,969,800
7.2					
7.3	Allowance for aluminium panels	651	m ²	400	260,400
7.4	Allowance for ground floor curtain waling	79	m ²	900	71,100
7.5	Allowance for balcony balustrades	636	m	300	190,800
7.6	Plant screen to roof level	1	item	50,000	50,000
8.0	External Doors	173,252		0	85,000
8.1	Main entrance doors	2	nr	10,000	20,000
8.2	Allowance for means of escape doors; say	28	nr	2,000	56,000
8.3	Allowance for double leaf door to bike stores and plant rooms	2	nr	2,000	4,000
8.4	Allowance for single leaf door to plant/BOH area	4	nr	1,200	4,800
9.0	Internal Walls & Partitions - Landlord areas only	173,252		3	520,000
9.1	Allowance for blockwork walls, including fire stopping/head detail; say	204	m ²	75	15,300
9.2	Allowance for internal stud partitions to common areas; say	3,362	m ²	150	504,225
9.3	Allowance for lift and staircase enclosures; say				Excluded
9.4	Allowance for apartments party walls; say				Included

Appendix C: Blocks A&B Shell and Core Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
10.0	Internal Doors	173,252		3	510,000
10.1	Allowance for internal single leaf timber doors to common areas; incl ironmongery and framing, say	32	nr	1,600	51,200
10.2	Allowance for internal riser doors to common areas; incl ironmongery and framing, say	56	nr	600	33,600
10.3	Allowance for internal single leaf apartment entrance doors; incl ironmongery and framing, say	212	nr	2,000	424,000
11.0	Floor Finishes - Landlord areas only	173,252		2	400,000
11.1	Raised floor to circulation areas on upper floors	1,803	m ²	90	162,000
11.2	Screed and levelling finishes to landlord areas	1,803	m ²	40	72,000
11.3	Carpet finish's to landlord areas; assume carpet tile or similar	1,609	m ²	45	72,000
11.4	Concrete sealer; to plant and stair core areas	860	m ²	25	21,000
11.5	Allowance for skirting; generally	1	item	30,000	30,000
11.6	Entrance matting; to main entrance	1	nr	15,000	15,000
11.7	Allowance for feature flooring to entrance	1	item	25,000	25,000
12.0	Wall Finishes - Landlord areas only	173,252		1	120,000
12.1	Emulsion paint throughout	3,566	m ²	12	42,786
12.2	Concrete sealer to plant and stair core areas	3,774	m ²	20	75,471
13.0	Ceiling Finishes - Landlord areas only	173,252		1	140,000
13.1	Suspended ceilings with paint finish	1,803	m ²	65	117,200
13.2	Concrete sealer to plant and stair core areas	860	m ²	20	17,193
13.3	Allowance for finish to stair soffits	1	item	10,000	10,000

Appendix C: Blocks A&B Shell and Core Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
14.0	Fixtures & Fittings	173,252		-	250,000
14.1	Allowance for fitting to entrances	1	item	50,000	50,000
14.2	Allowance for postage fittings	1	item	150,000	150,000
14.3	Signage generally; internal	1	item	25,000	25,000
14.4	Signage generally; external	1	item	25,000	25,000
15.0	Services Shell & Core	173,252		35	5,980,000
15.1	Sanitaryware	1	item	2,300	2,000
15.2	Services equipment				0
15.3	disposals insulation	1	item	556,177	556,000
15.4	water instalations	1	item	418,174	418,000
15.5	heat source	1	item	117,835	118,000
15.6	Space heatinga nd air treatment	1	item	379,583	380,000
15.7	Ventilation systems	1	item	661,466	661,000
15.8	Electrical systems	1	item	1,048,815	1,049,000
15.9	Gas Instalations				0
15.10	Lift Instalations	1	item	815,000	815,000
15.11	Protective instalations	1	item	335,938	336,000
15.12	Communications	1	item	1,017,728	1,018,000
15.13	Specalist Instalations	1	item	622,167	622,000
15.14	BWIC	1	item		0
16.0	Services Fitout	173,252		-	0
					Included in summary
29.0	Renewables	173,252		2	400,000
32.0	External Services	173,252		-	0
					Included in summary

Appendix C: Blocks A&B Shell and Core Cost Estimate

Nr	Item	Quantity	Unit	Rate	Total
	SUB TOTAL	173,252		133	23,030,000
	Main Contractor Preliminaries	16%			3,680,000
	Overheads & Profit	4%			1,070,000
	Contractor (D&B) Risk	2%			Excluded
	Client FF&E - Allowance				Excluded
	TOTAL	173,252		160	27,780,000

Appendix D: Residential Fitout Model

Gurnell Leisure Redevelopment - Leisure Centre and Residential Blocks A and B

Cost Estimate DRAFT



Appendix B - Blocks A&B Fit-out Cost Model

Gurnell Leisure BTR Fit-Out Analysis Model:

Typical Apartment Plans			Based on Building A/B: 180237-3DR-AB-05-DR-00205	Based on Building A/B: 180237-3DR-AB-03-DR-00203	Based on Building A/B: 180237-3DR-AB-01-DR-00201	Based on Building A/B: 180237-3DR-AB-01-DR-00201	Based on Building A/B: 180237-3DR-AB-01-DR-00201	Based on Building A/B: 180237-3DR-AB-05-DR-00205	Based on Building A/B: 180237-3DR-AB-05-DR-00205
Elements	Rate	unit	Type A 1 Bed Total nr. of unit type: 30 Ave size: 48 m² 521 ft²	Type B 1 Bed Total nr. of unit type: 4 Ave size: 60 m² 647 ft²	Type C 2 Bed Total nr. of unit type: 24 Ave size: 59 m² 637 ft²	Type D 1 Bed Total nr. of unit type: 4 Ave size: 56 m² 604 ft²	Type E 1 Bed Total nr. of unit type: 44 Ave size: 39 m² 416 ft²	Type F 3 Bed Total nr. of unit type: 10 Ave size: 85 m² 911 ft²	Type G 2 Bed Total nr. of unit type: 10 Ave size: 64 m² 694 ft²
Internal Walls			Qty	Qty	Qty	Qty	Qty	Qty	Qty
Internal walls corridor / apartments / party		included within shell & core							
Internal Division Walls within apartments; metal stud acoustically treated (assumed 2.5m clear height)	60	m²	29	36	50	40	26	76	60
Plasterboard lining to internal face of all external walls; 2.5m clear height	40	m²	18	35	40	14	14	49	42
Internal Doors									
Main entrance door: Site painted flush panel doors: door and frame assumed 30s fire rated to BS 746, softwood frame including ironmongery and signage	-	included within shell & core							
Internal Apartment doors - Single Leaf; painted timber veneered inch ironmongery; generally	500	nr	1	2	2	1	1	3	2
Internal Apartment doors - Single Leaf; painted timber veneered inch ironmongery; to bathroom	500	nr	1	1	3	1	1	2	2
AV / services cupboard / Storage cupboard doors - Double Leaf; Painted MDF panel (excl Wall Finishes	850	nr	1	1	1	1	1	1	1
Allowance for Matt emulsion paint finish throughout; 2.5m clear height; 2 sides	8	m²	122	154	181	188	113	240	127
Skirting to all walls	12	m	44	56	52	56	40	86	68
E.O Finish to Kitchen Walls - gloss tiled splash back 1m deep	85	m²	6	4	5	6	4	7	6
Finish to Bathroom Walls Ceramic Tiling (to 40%)	60	m²	8	10	15	8	8	16	15
Floor Finishes									
All rooms - floating / screed floor	35	m²	50	62	32	58	40	89	68
Apartment Living / Kitchen Area/ Hallway / Service cupboard - Five Wood Aspect LVT	40	m²	31	40	31	39	21	44	35
Apartment Bedrooms - Carpet (Mix TBA)	35	m²	13	14	22	13	13	33	23
Bathroom Flooring - Slip resistant vinyl sheet flooring, 2 thick, on and including acoustic underlay: fix to floor with adhesive	40	m²	4	6	7	4	8	8	7
Ceiling Finishes									
All rooms - Plasterboard with mineral wool blanket & matt emulsion paint	50	m²	50	62	62	58	40	89	34
E.O for water resistance plasterboard: to bathrooms only	5	m²	4	6	7	4	20	8	8
E.O for Access Panels; (excluded)	100	nr	1	1	1	1	1	1	1
Allowance for Blind Boxes and recessed curtain tracks	800	item	1	1	1	1	1	1	1
Fittings & Furnishings									
Kitchens (Incl Fitted Units, Standard worktops, appliances, etc); to 1 Bed	5,000	nr	1	1	1	1	1	1	1
Ditto to 2 Bed	6,000	nr			1				
Ditto to 3 Bed	7,000	nr							
Extra over for white goods (included within kitchen allowance)			inc kitchen	inc kitchen	inc kitchen	inc kitchen	inc kitchen	inc kitchen	inc kitchen
Bathrooms									
Cupboards over vanity units; mirrored	300	nr	1	1	2	1	1	2	2
Allowance for tiled access panels to vanity units	50	nr	1	1	2	1	1	2	2
Toilet roll holder and coat hook only	100	nr	1	1	2	1	2	2	2
Bath panels	250	nr	1	1	1	1	1	1	1
Shower screens	400	nr	1	1	2	1	2	2	2
Wardrobes									
Wardrobes - Sliding doors, Internal lacquered finish	700	nr	1	1	2	1	1	3	2
Building Elements Total Fit out Cost			£ 20,520 39.41	£ 24,030 37.12	£ 23,230 38.48	£ 23,230 38.48	£ 18,870 45.32	£ 37,010 40.64	£ 28,150 40.58
Average Cost per Unit			£ 424/ m² NIA 39 ft²	£ 400/ m² NIA 37 ft²	£ 475/ m² NIA 44 ft²	£ 414/ m² NIA 38 ft²	£ 488/ m² NIA 45 ft²	£ 437/ m² NIA 41 ft²	£ 437/ m² 41 ft²
MEP Elements									
Average Cost per Unit Blended Rate			£22,262 NIA	£27,685 NIA	£27,256 NIA	£25,813 NIA	£22,295 NIA	£38,943 NIA	£29,666 NIA
Combined - M&E and Building Element Preliminaries	15%		£ 42,782 8,400	£ 51,715 7,800	£ 55,356 8,300	£ 49,043 7,400	£ 41,165 6,200	£ 75,953 11,400	£ 57,816 8,700
Overall Profit Risk	5%		£ 2,100 3,000	£ 2,100 3,000	£ 2,100 3,000	£ 2,100 3,000	£ 2,100 3,000	£ 2,100 3,000	£ 2,100 3,000
Overall Total (£/ft²)			£ 52,400 99	£ 54,200 96	£ 58,400 104	£ 53,900 98	£ 45,300 119	£ 81,300 100	£ 62,500 100
TOTAL UNITS / nr			30	4	24	4	44	10	10
TOTAL COST / £			£ 1,542,000	£ 249,000	£ 1,598,000	£ 236,000	£ 2,178,000	£ 913,000	£ 695,000

Gurnell Leisure Redevelopment - Leisure Centre and Residential Blocks A and B

Cost Estimate DRAFT



Appendix B - Blocks A&B Fit-out Cost Model

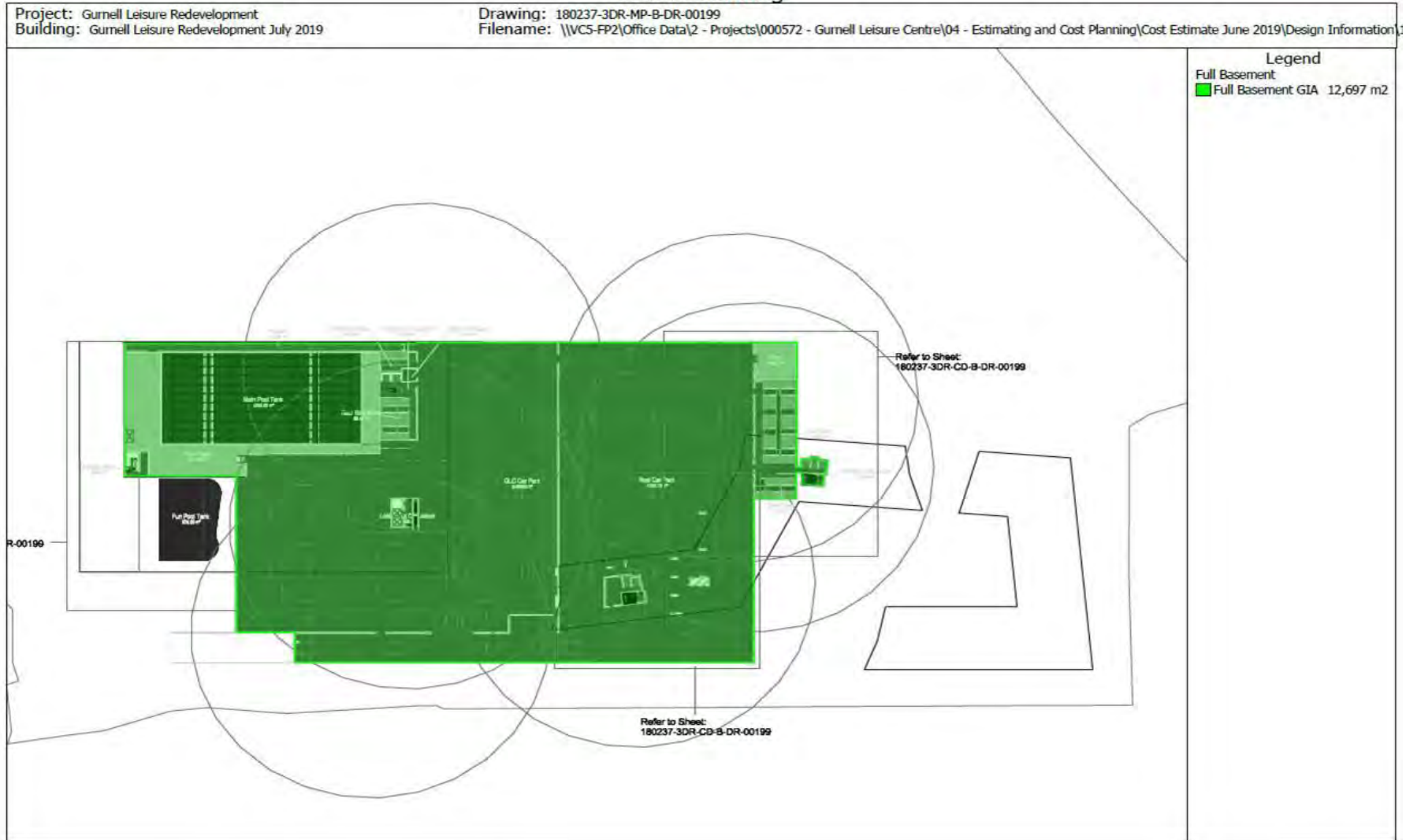
Gurnell Leisure BTR Fit-Out Analysis Model:

Typical Apartment Plans			Based on Building A/B: 180237-3DR-AB-05-DR-00205			Based on Building A/B: 180237-3DR-AB-01-DR-00201			Based on Building A/B: 180237-3DR-AB-01-DR-00201			Based on Building A/B: 180237-3DR-AB-05-DR-00205			Based on Building A/B: 180237-3DR-AB-05-DR-00205			TOTAL OVERALL					
Elements			Type H 2 Bed			Type I 1 Bed			Type J 2 Bed			Type K 2 Bed			Type L 1 Bed			Total nr of Units: Total PRS NIA : Total GIA: Qty					
			Total nr. of unit type: 10 Ave size 67 m² 720 ft²			Total nr. of unit type: 14 Ave size 51 m² 546 ft²			Total nr. of unit type: 14 Ave size 59 m² 638 ft²			Total nr. of unit type: 20 Ave size 72 m² 771 ft²			Total nr. of unit type: 28 Ave size 46 m² 491 ft²			11,876 m² 127,836 ft² 171,804 ft² Total £/ft² (NIA)					
			Rate	unit	Qty	Total	£/ft² (NIA)	Qty	Total	£/ft² (NIA)	Qty	Total	£/ft² (NIA)	Qty	Total	£/ft² (NIA)	Qty	Total	£/ft² (NIA)	Qty	Total	£/ft² (NIA)	
Internal Walls																							
Internal walls corridor / apartments / party			included within shell & core																				
Internal Division Walls within apartments; metal stud acoustically treated (assumed 2.5m clear height)			60	m²	54	3,220	4.47	37	2,250	4.12	55	3,290	5.16	72	4,340	5.63	27	1,650	3.36	8,938	60	536,700	4.20
Plasterboard lining to internal face of all external walls; 2.5m clear height			40	m²	25	1,000	1.39	36	1,460	2.67	41	1,637	2.57	43	1,722	2.23	18	715	1.46	5,942	40	237,700	1.86
Internal Doors																							
Main entrance door: Site painted flush panel doors: door and frame assumed 30s fire rated to BS 746, softwood frame including ironmongery and signage			-	included within shell & core																			
Internal Apartment doors - Single Leaf; painted timber veneered inch ironmongery; general			500	nr	2	1,000	1.39	1	500	0.92	2	1,000	1.57	2	1,000	1.30	1	500	1.02	318	500	159,000	1.24
Internal Apartment doors - Single Leaf; painted timber veneered inch ironmongery; to bathroom			500	nr	3	1,500	2.08	1	500	0.92	2	1,000	1.57	3	1,500	1.95	1	500	1.02	354	500	177,000	1.38
AV / services cupboard / Storage cupboard doors - Double Leaf; Painted MDF panel (excl Wall Finishes			850	nr	1	850	1.18				1	850	1.33	1	850	1.10	1	850	1.73	198	850	168,300	1.32
Allowance for Matt emulsion paint finish throughout; 2.5m clear height; 2 sides			8	m²	112	900	1.25	71	570	1.04	110	877	1.38	96	766	0.99	121	969	1.97	26,966	8	215,500	1.69
Skirting to all walls			12	m	62	740	1.03	50	600	1.10	46	549	0.86	48	571	0.74	43	522	1.06	10,462	11,97671326	125,300	0.98
E.O Finish to Kitchen Walls - gloss tiled splash back 1m deep			85	m²	6	500	0.69	5	440	0.81	5	463	0.73	6	489	0.63	6	470	0.96	1,110	85	94,600	0.74
Finish to Bathroom Walls Ceramic Tiling (to 40%)			60	m²	8	500	0.69	8	500	0.92	15	907	1.42	15	912	1.18	8	498	1.01	2,311	60	138,800	1.09
Floor Finishes																							
All rooms - floating / screed floor			35	m²	70	2,440	3.39	53	1,850	3.39	62	2,190	3.43	193	6,760	8.77	47	1,650	3.36	13,588	35	475,800	3.72
Apartment Living / Kitchen Area/ Hallway / Service cupboard - Five Wood Apect LVT			40	m²	33	1,340	1.86	34	1,380	2.53	31	1,220	1.91	41	1,630	2.12	30	1,200	2.45	6,618	40	264,700	2.07
Apartment Bedrooms - Carpet (Mix TBA)			35	m²	25	880	1.22	12	430	0.79	22	770	1.21	24	840	1.09	11	400	0.82	3,696	35	129,500	1.01
Bathroom Flooring - Slip resistant vinyl sheet flooring, 2 thick, on and including acoustic underlay: fixins with adhesive			40	m²	8	330	0.46	4	160	0.29	7	270	0.42	7	270	0.35	11	440	0.90	1,478	40	58,800	0.46
Ceiling Finishes																							
All rooms - Plasterboard with mineral wool blanket & matt emulsion paint			50	m²	70	3,490	4.85	53	2,650	4.85	62	3,120	4.89	72	3,580	4.65	47	2,360	4.81	11,535	50	577,000	4.51
E.O for water resistance plasterboard: to bathrooms only			5	m²	7	30	0.04	4	20	0.04	7	30	0.05	7	30	0.04	4	20	0.04	1,126	5	5,400	0.04
E.O for Access Panels; (excluded)			100	nr	1	Excluded		1	Excluded		1	Excluded		1	Excluded		1	Excluded		212	800	169,600	1.33
Allowance for Blind Boxes and recessed curtain tracks			800	item	1	800	1.11	1	800	1.46	1	800	1.25	1	800	1.04	1	800	1.63	212	800	169,600	1.33
Fittings & Furnishings																							
Kitchens (Incl Fitted Units, Standard worktops, appliances, etc); to 1 Bed			5,000	nr				1	5,000	9.15	1	6,000	9.41	1	6,000	7.79	1	5,000	10.19	124	5000	620,000	4.85
Ditto to 2 Bed			6,000	nr	1	6,000	8.33												78	6000	468,000	3.66	
Ditto to 3 Bed			7,000	nr															10	7000	70,000	0.55	
Extra over for white goods (included within kitchen allowance)						incl kitchen			incl kitchen			incl kitchen			incl kitchen			incl kitchen		-		-	
Bathrooms																							
Cupboards over vanity units; mirrored			300	nr	2	600	0.83	1	300	0.55	2	600	0.94	2	600	0.78	1	300	0.61	300	300	90,000	0.70
Allowance for tiled access panels to vanity units			50	nr	2	100	0.14	1	50	0.09	2	100	0.16	2	100	0.13	1	50	0.10	300	50	15,000	0.12
Toilet roll holder and coat hook only			100	nr	2	200	0.28	1	100	0.18	2	200	0.31	2	200	0.26	1	100	0.20	300	100	30,000	0.23
Bath panels			250	nr	2	500	0.69	1	250	0.46	1	250	0.39	1	250	0.32	1	250	0.51	222	250	55,500	0.43
Shower screens			400	nr	1	400	0.56	1	400	0.73	2	800	1.25	2	800	1.04	1	400	0.82	290	400	116,000	0.91
Wardrobes																							
Wardrobes - Sliding doors, Internal lacquered finish			700	nr	2	1,400	1.94	1	700	1.28	2	1,400	2.20	2	1,400	1.82	1	700	1.43	310	700	217,000	1.70
Building Elements Total Fit out Cost						£ 28,720	39.88		£ 20,810	38.28		£ 28,320	44.41		£ 35,410	45.95		£ 20,340	41.45			£ 5,215,200	40.80
Average Cost per Unit						£ 429/ m²	NIA		£ 412/ m²	NIA		£ 478/ m²	NIA		£ 495/ m²	NIA		£ 446/ m²	NIA			£ 439/ m²	NIA
						40 ft²			38 ft²			44 ft²			46 ft²			41 ft²					
MEP Elements																							
Average Cost per Unit Blended Rate																							
Combined - M&E and Building Element Preliminaries			15%			£ 59,513			£ 44,266			£ 55,587			£ 68,363			£ 41,325				£ 10,682,000	
Overhead and Profit Risk			5%			£ 8,900			£ 6,600			£ 8,300			£ 10,300			£ 6,200				£ 1,600,000	
Overall Total (£)						£ 3,100			£ 2,300			£ 2,900			£ 3,500			£ 2,100				£ 550,000	
Overall Total (£/ft²)						£ 71,500			£ 53,200			£ 66,900			£ 82,200			£ 49,600				£ 12,830,000	
Overall Total (£/ft²)						99			87			105			107			101				100	£/ft² NIA
TOTAL UNITS / nr																							
TOTAL COST / £																							

Appendix E: GA Markup

C5 Basement Measure	
NIA	2668 m ²
GIA	12697 m ²

CostX Drawing

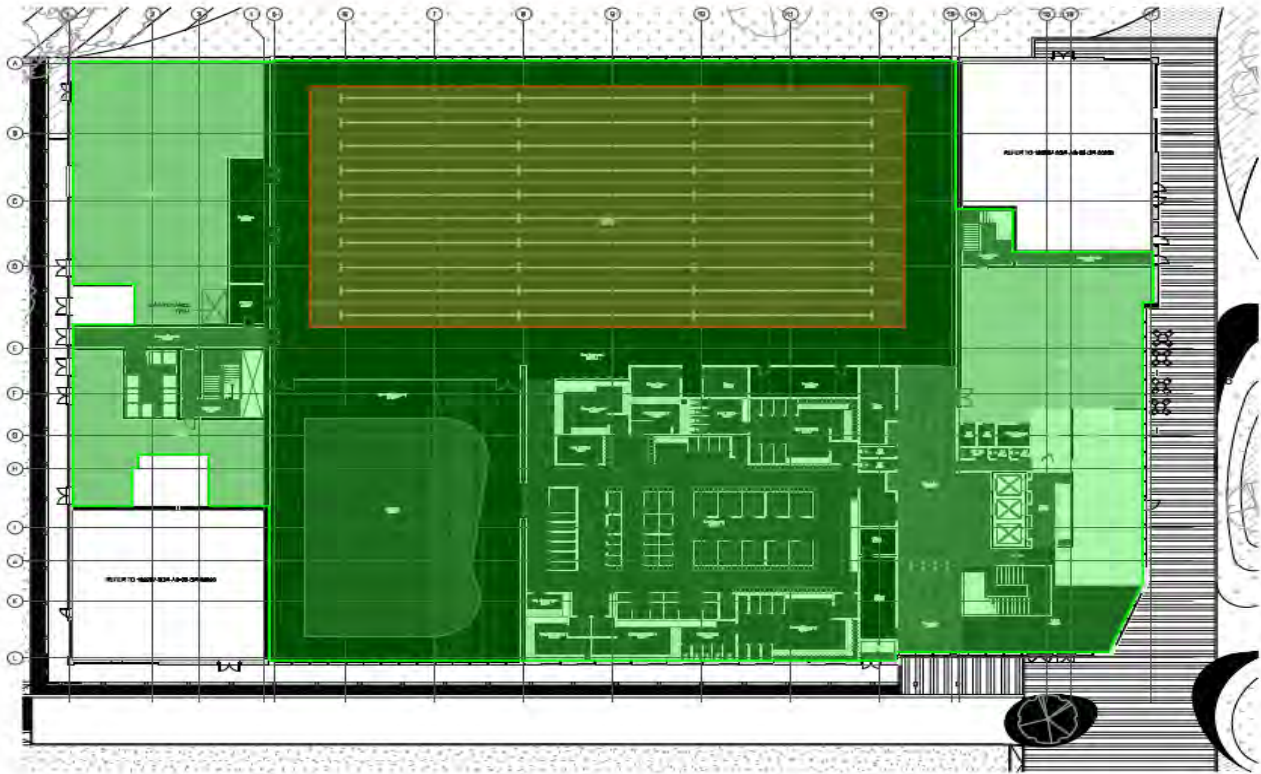


C5 Leisure L00 Measure	
NIA	3390 m ²
GIA	3716 m ²

CostX Drawing

Project: Gurnell Leisure Redevelopment
Building: Gurnell Leisure Redevelopment July 2019
Drawing: Leisure: 180237-3DR-LC-00-DR-00200: Model
Filename: O:\2 - Projects\000572 - Gurnell Leisure Centre\04 - Estimating and Cost Planning\Cost Estimate June 2019\Design Information\190702 Design Info

Legend
Leisure L00
L00 GIA 3,716 m2



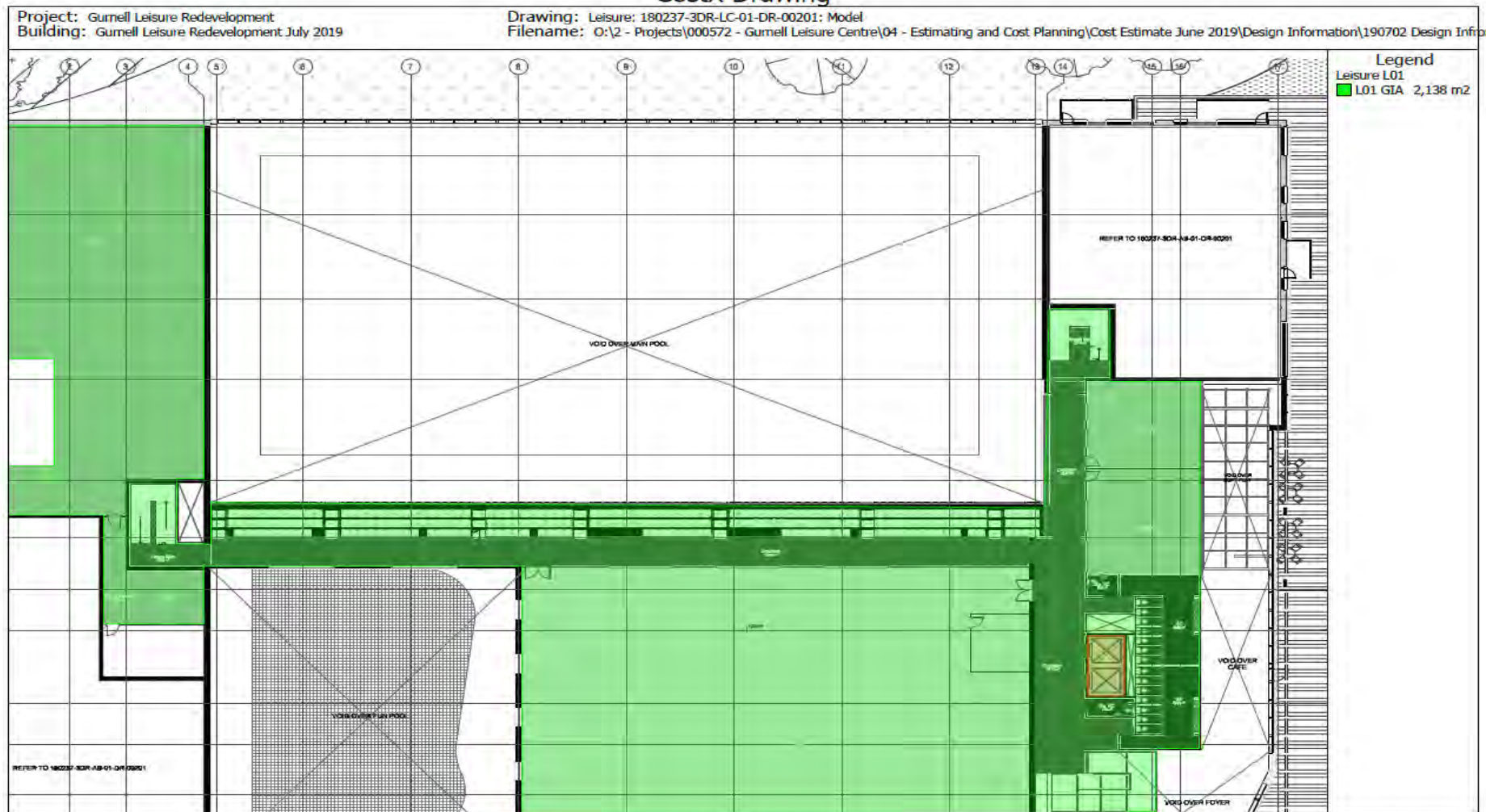
Gurnell Leisure Redevelopment - Leisure Centre and Residential Blocks A and B

Cost Estimate DRAFT

C5 Leisure L01 Measure

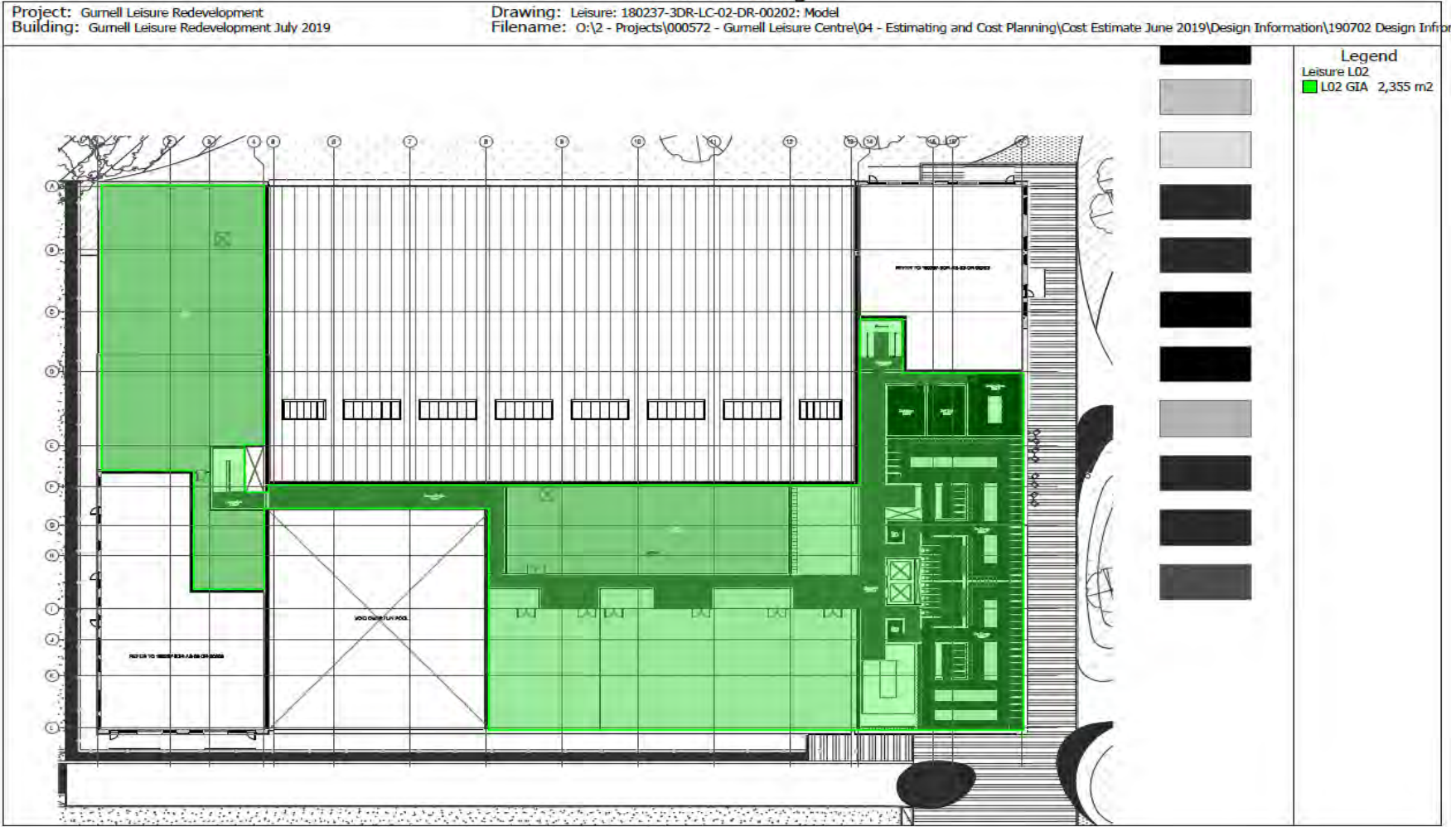
NIA	2030 m ²
GIA	2138 m ²

CostX Drawing



C5 Leisure L02 Measure	
NIA	2284 m ²
GIA	2355 m ²

CostX Drawing

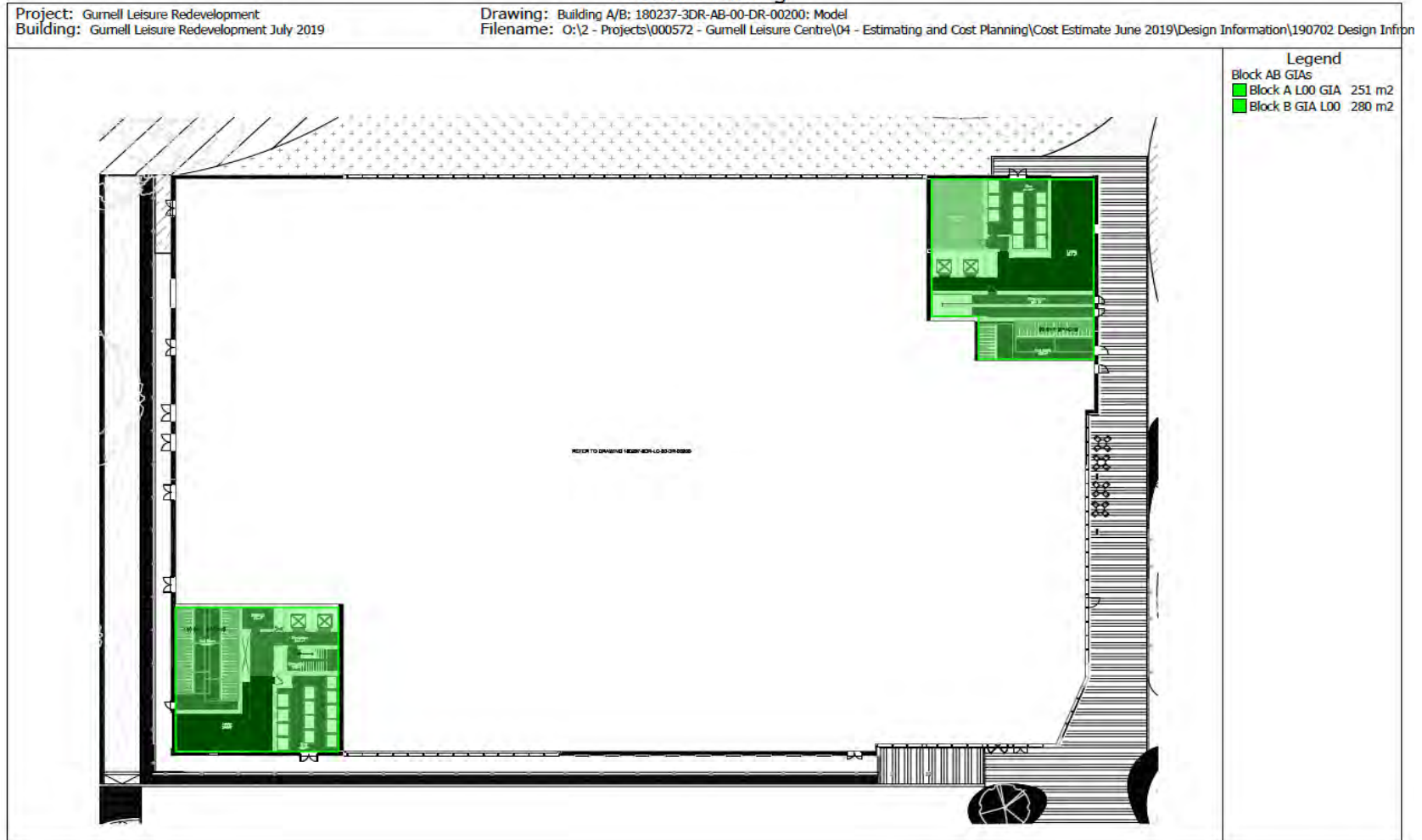


Gurnell Leisure Redevelopment - Leisure Centre and Residential Blocks A and B

Cost Estimate DRAFT

C5 Blocks AB L00 Measure	
NIA	0 m ²
GIA	581 m ²

CostX Drawing



C|5
coref|v

C5 Blocks AB L00 Measure	
NIA	0 m ²
GIA	90 m ²

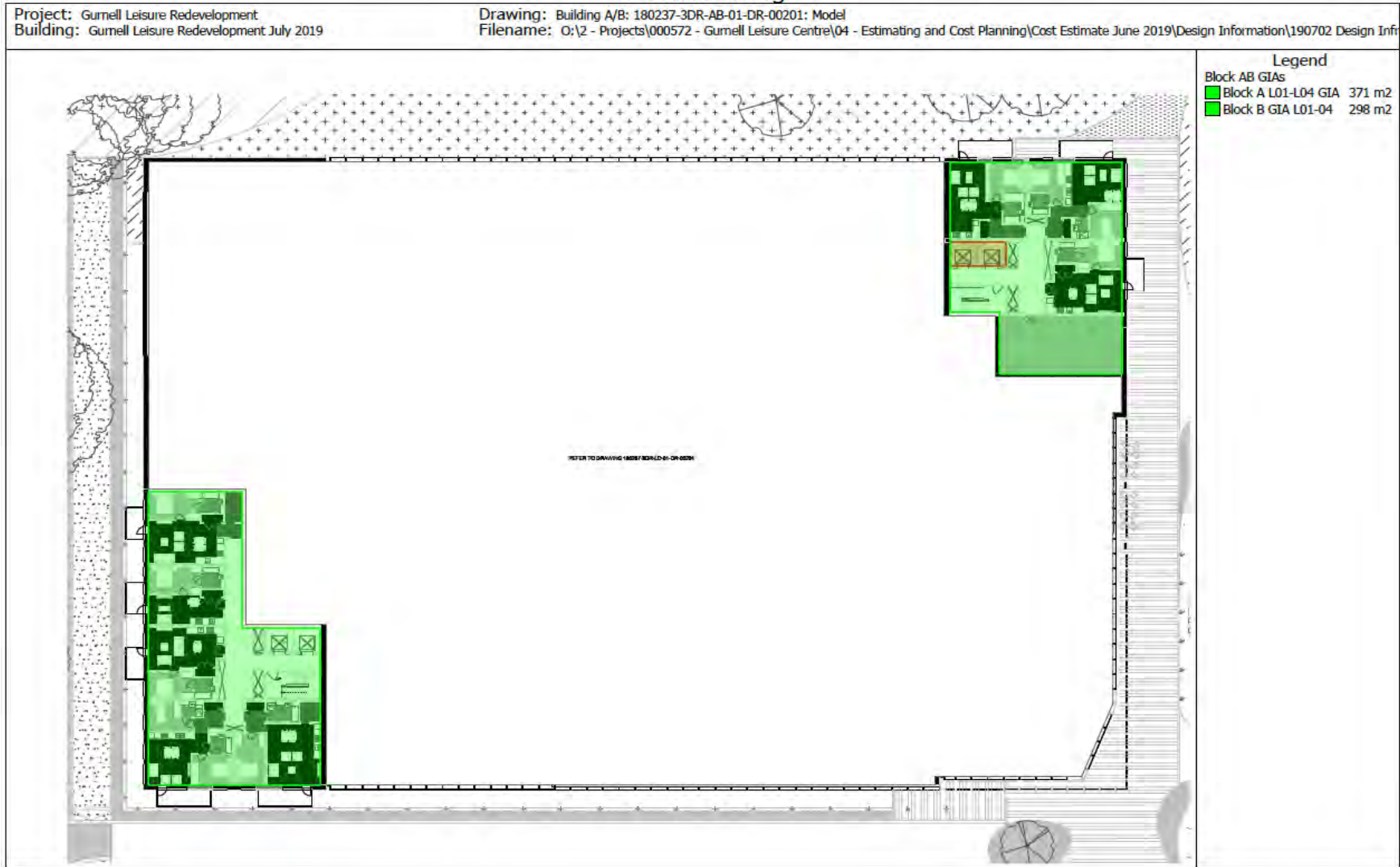
[illegible]

Gurnell Leisure Redevelopment - Leisure Centre and Residential Blocks A and B

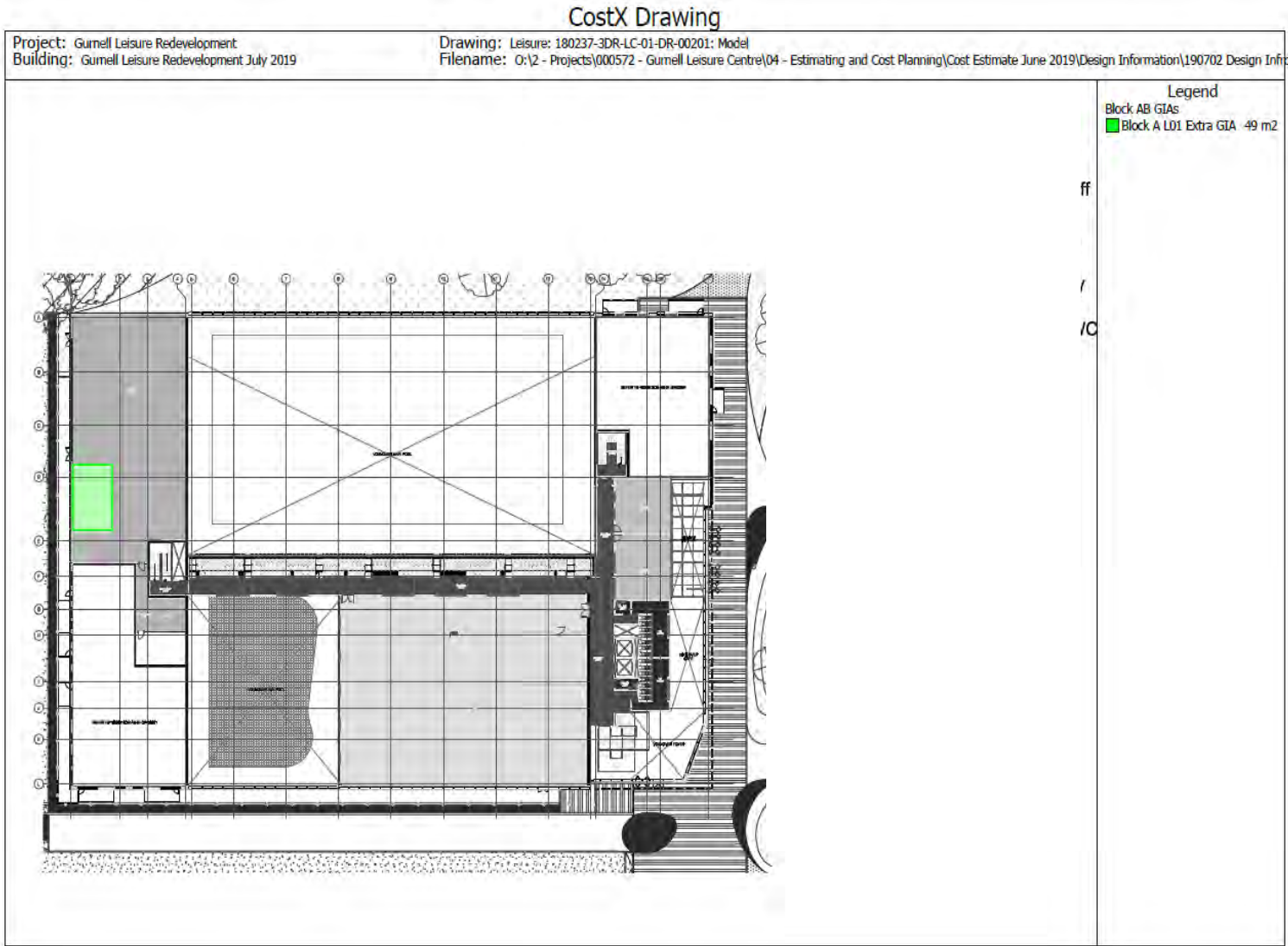
Cost Estimate DRAFT

C5 Blocks AB L01 Measure	
NIA	415 m ²
GIA	705 m ²

CostX Drawing

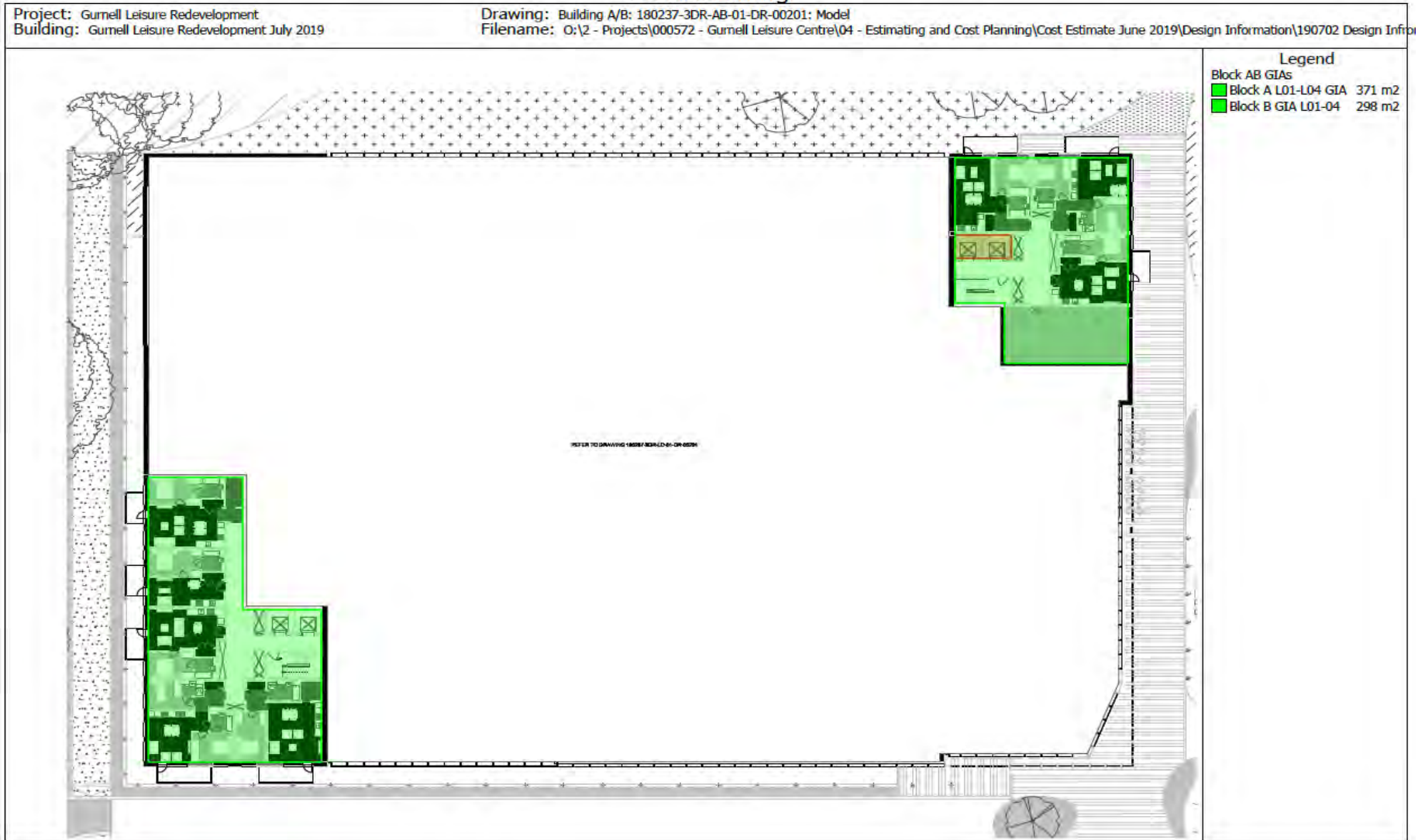


C5 Blocks AB L01 Measure	
NIA	
GIA	49 m ²



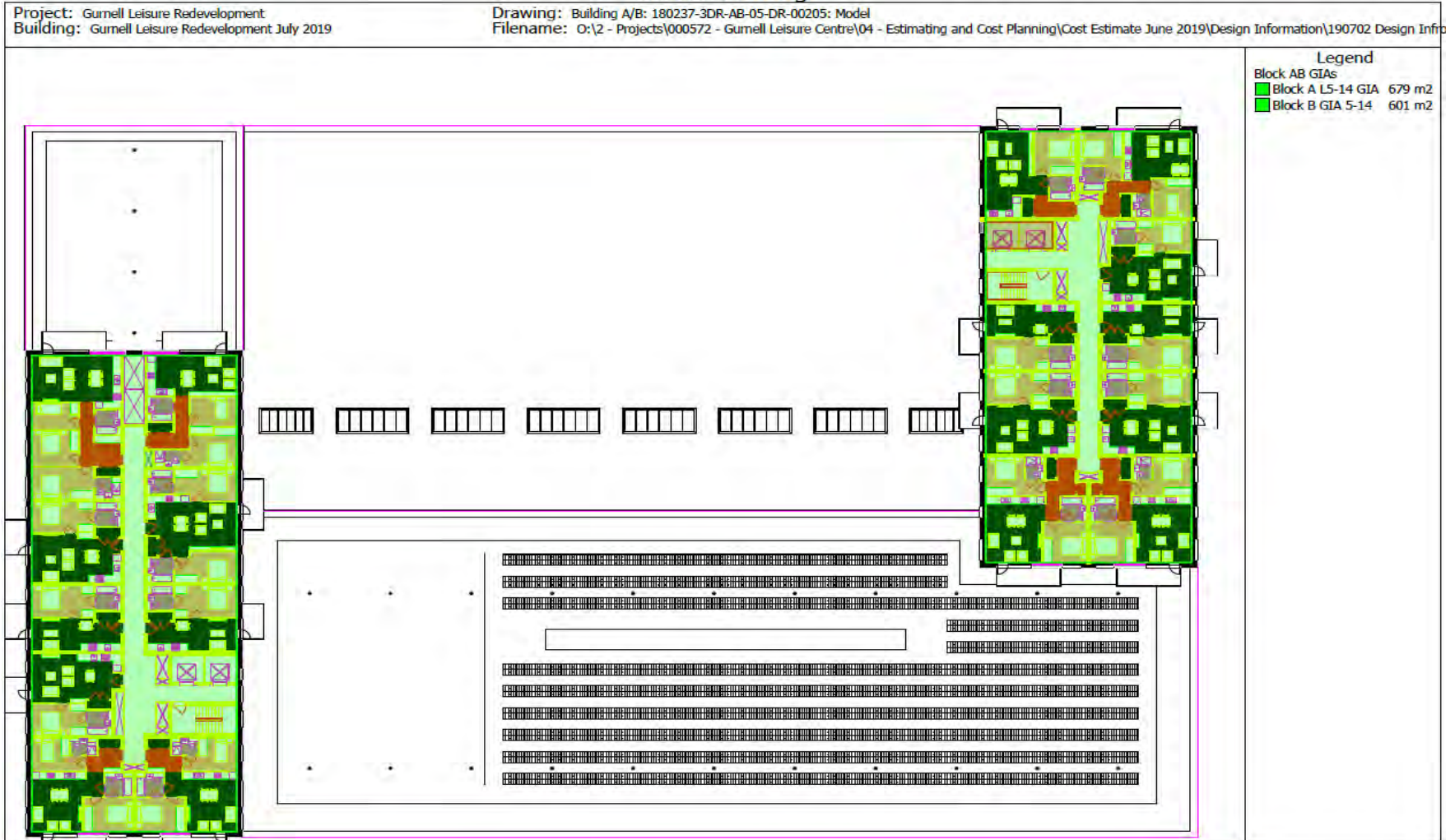
C5 Blocks AB L02-04 Measure	
NIA	415 m ²
GIA	669 m ²

CostX Drawing



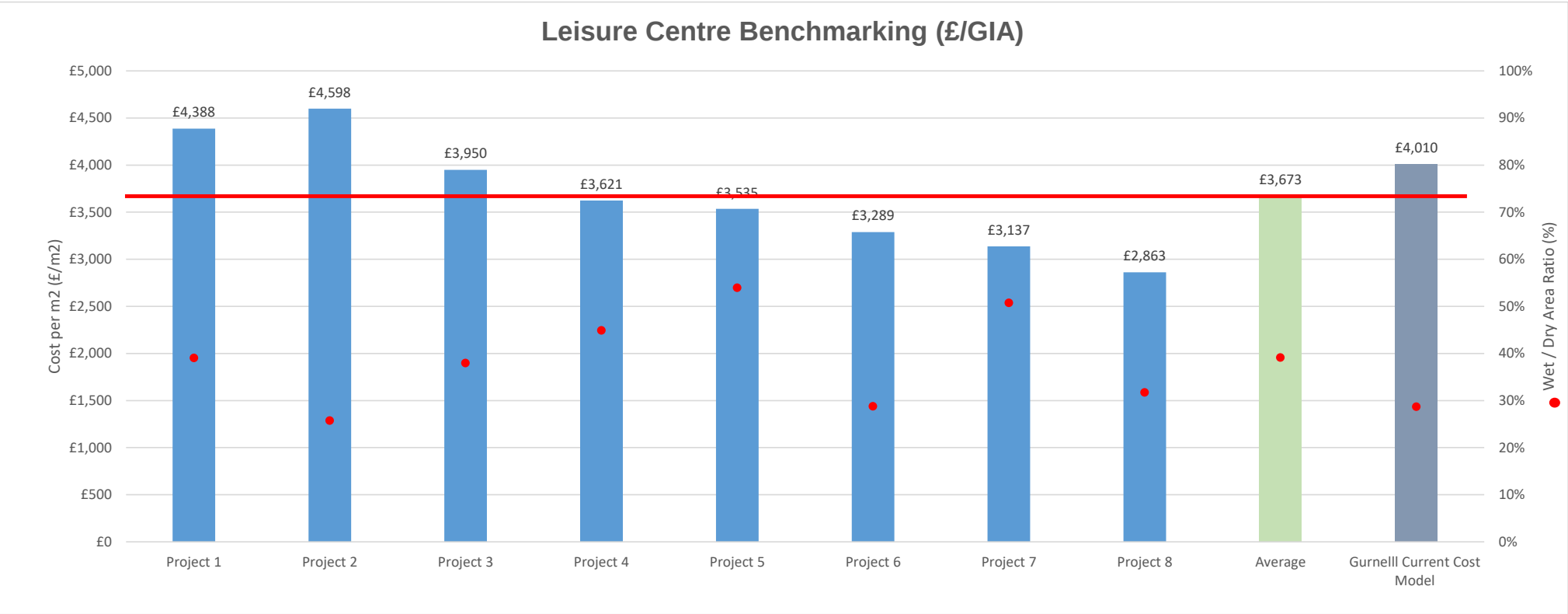
C5 Blocks AB L05-14 Measure	
NIA	1022 m ²
GIA	1280 m ²

CostX Drawing



Appendix F: Benchmarking

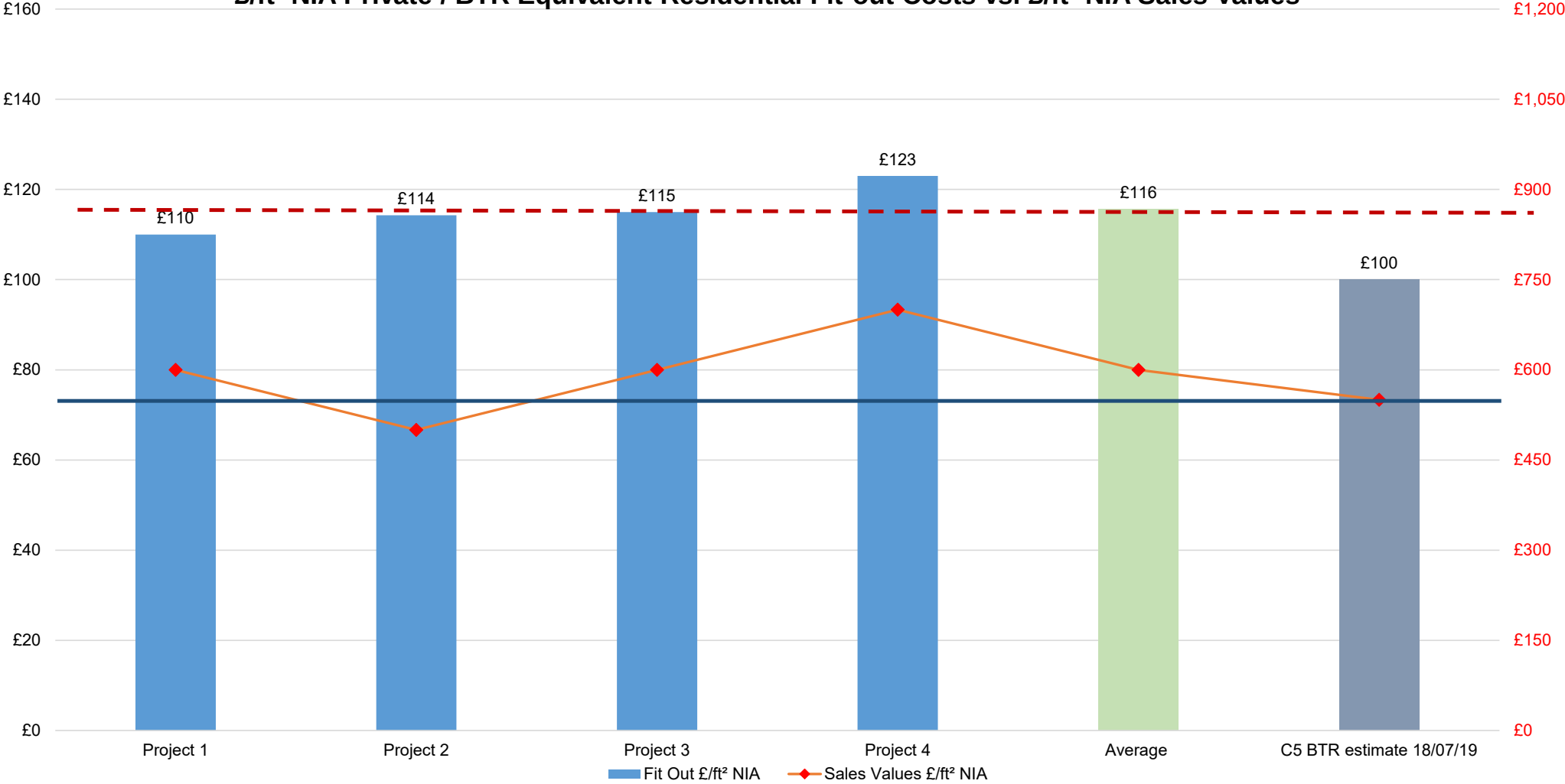
Appendix F: Benchmarking

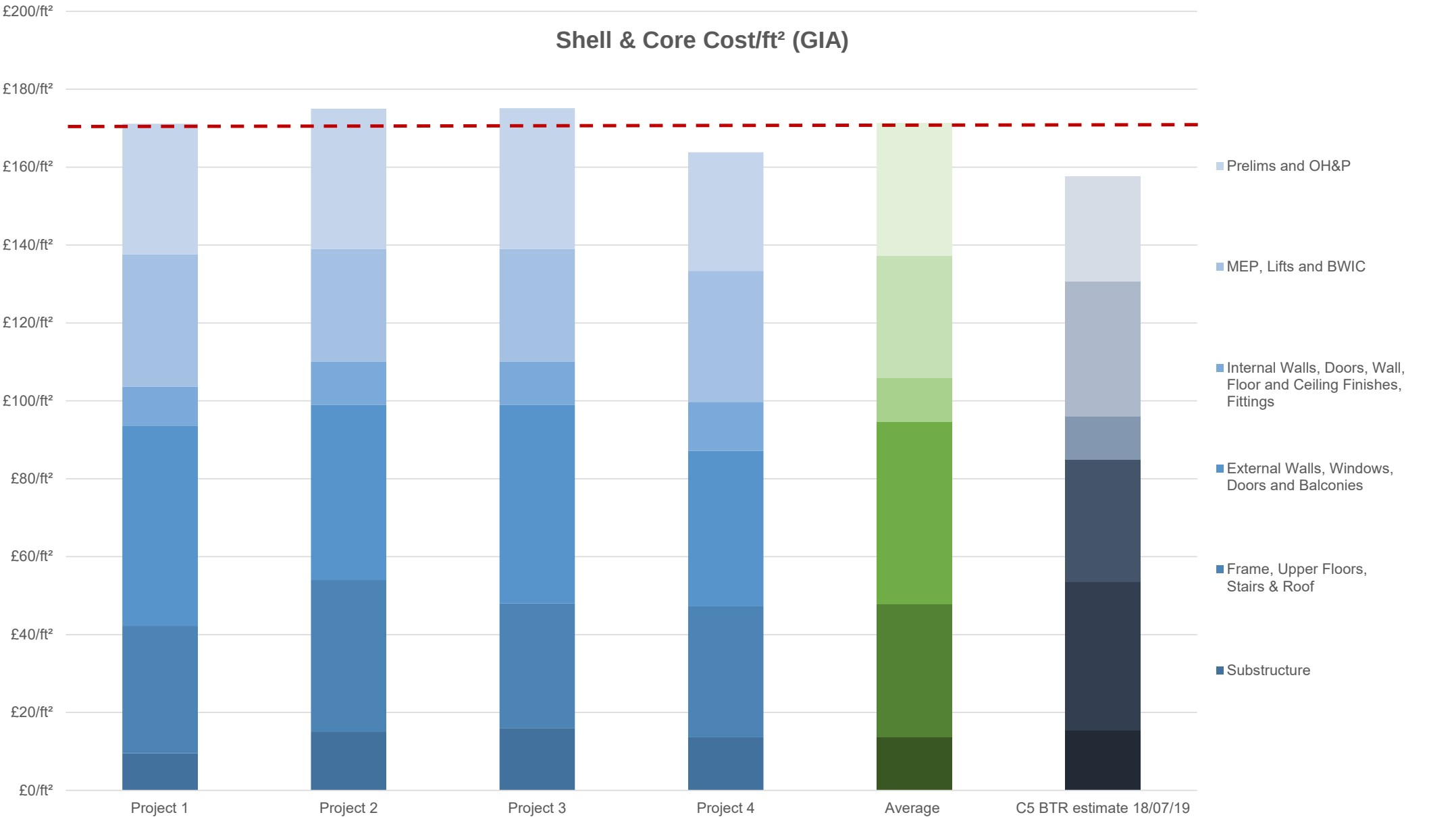


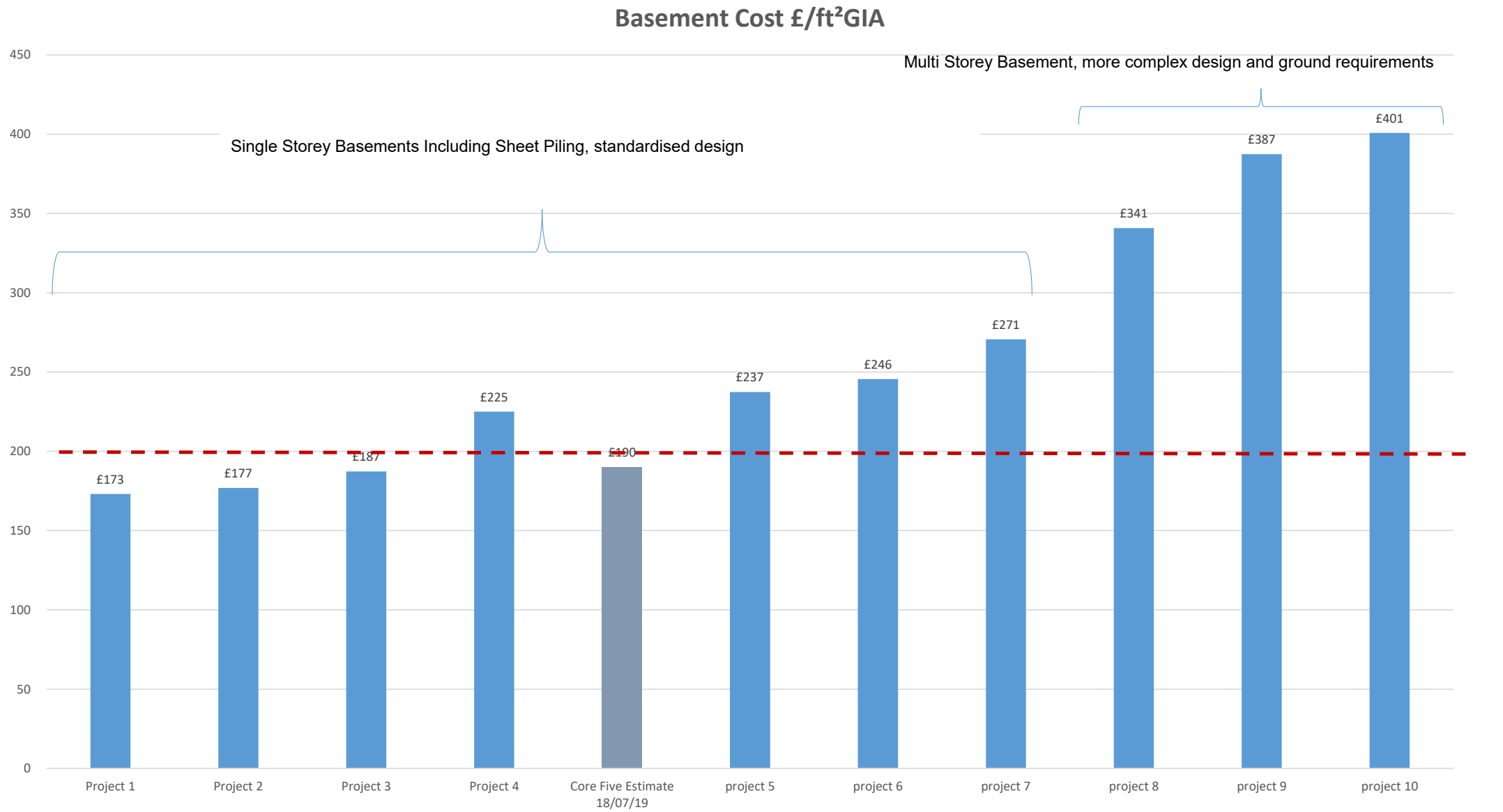
Key: ■ Cost per m2 (£/m2)
● Wet:Dry Area Ratio (%)

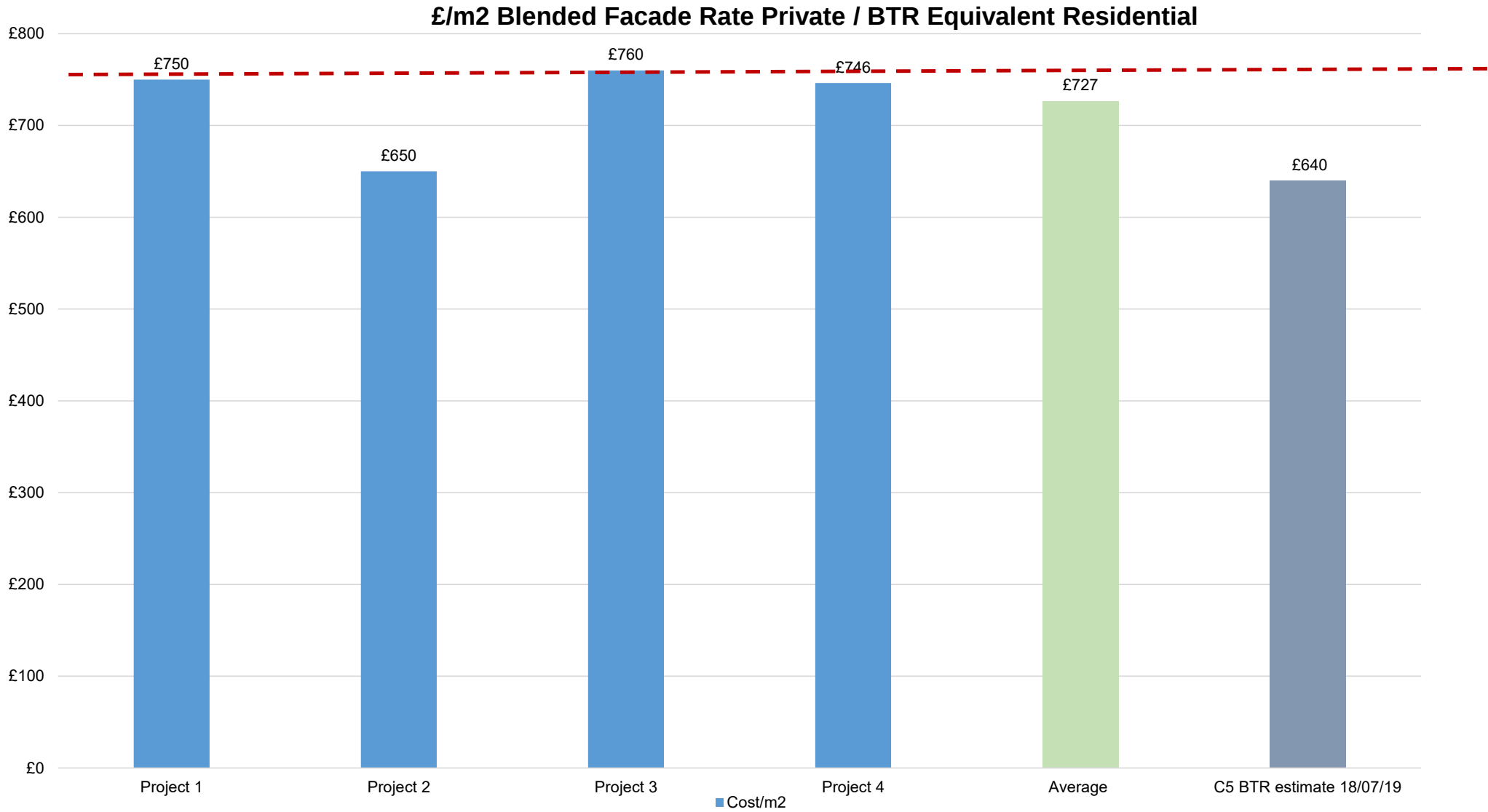


£/ft² NIA Private / BTR Equivalent Residential Fit-out Costs vs. £/ft² NIA Sales Values









Appendix G: Cashflow

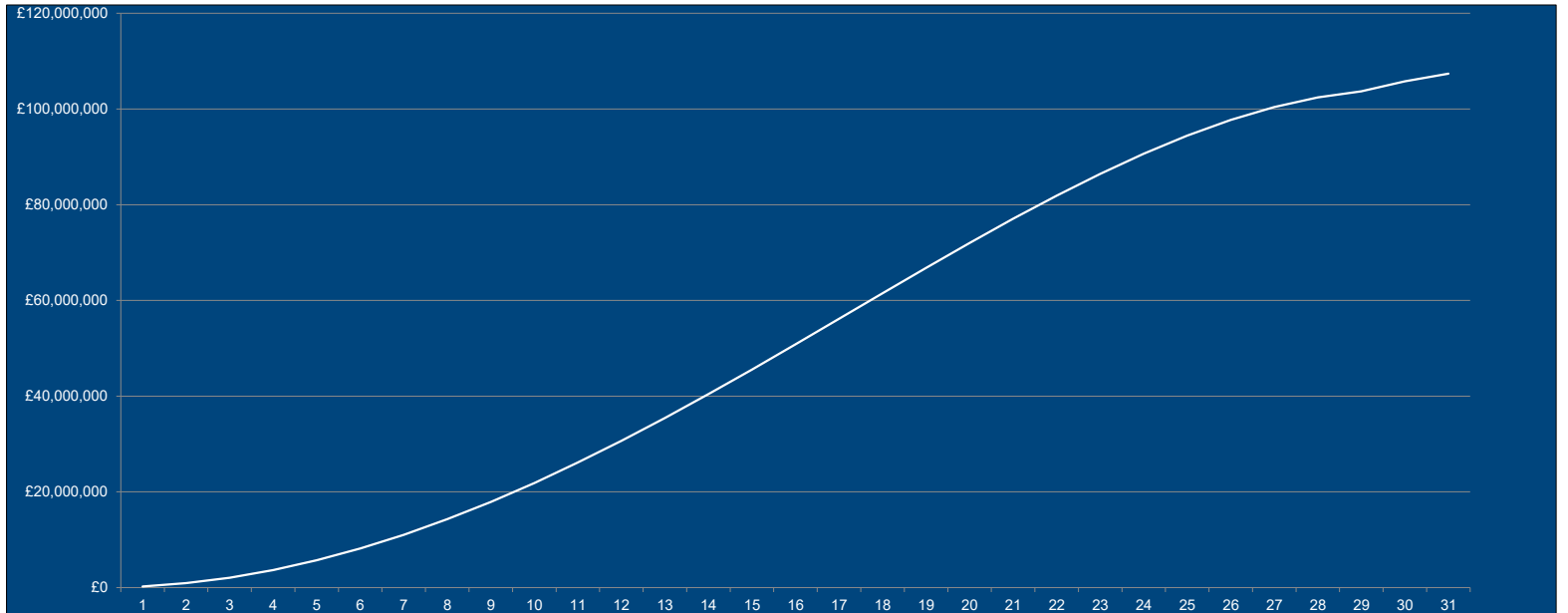
Gurnell Leisure Redevelopment - Leisure Centre and Residential Blocks A and B

Cost Estimate DRAFT



Gurnell Lesiure Redevelopment - Core Five Forecast Cashflow Jul '19		£107,380,000
Addition		
• Add Post Novation Design Fees • Add Provisional Sums		Excluded Excluded
Revised Total		£107,380,000

Current forecast costs		£107,380,000	
Start Month	Month		Total
	1 Dec-19		£231,335
	2 Jan-20	£692,462	£923,797
	3 Feb-20	£1,148,959	£2,072,756
	4 Mar-20	£1,597,741	£3,670,498
	5 Apr-20	£2,035,722	£5,706,220
	6 May-20	£2,459,815	£8,166,034
	7 Jun-20	£2,866,933	£11,032,968
	8 Jul-20	£3,253,992	£14,286,959
	9 Aug-20	£3,617,904	£17,904,863
	10 Sep-20	£3,955,584	£21,860,447
	11 Oct-20	£4,263,944	£26,124,391
	12 Nov-20	£4,539,900	£30,664,292
	13 Dec-20	£4,780,365	£35,444,657
	14 Jan-21	£4,982,253	£40,426,910
	15 Feb-21	£5,142,477	£45,569,388
	16 Mar-21	£5,257,952	£50,827,339
	17 Apr-21	£5,325,591	£56,152,930
	18 May-21	£5,342,307	£61,495,237
	19 Jun-21	£5,305,016	£66,800,254
	20 Jul-21	£5,210,630	£72,010,884
	21 Aug-21	£5,056,064	£77,066,948
	22 Sep-21	£4,838,231	£81,905,179
	23 Oct-21	£4,554,045	£86,459,225
	24 Nov-21	£4,200,421	£90,659,645
	25 Dec-21	£3,774,270	£94,433,916
	26 Jan-22	£3,272,509	£97,706,425
	27 Feb-22	£2,692,050	£100,398,475
	28 Mar-22	£2,029,807	£102,428,281
	29 Apr-22	£1,282,694	£103,710,975
	30 May-22	£2,058,325	£105,769,300
Retention Release	31 May-23	£1,610,700	£107,380,000



Submitted by:

[REDACTED]

Partner

Core Five LLP
230 Blackfriars Rd.
London SE1 8NW

+ [REDACTED]

APPENDIX 5: ECONOMIC AND MACRO PROPERTY MARKET COMMENTARY

UK MARKET MACRO

SUMMER 2020

LSH RESEARCH

UK ECONOMY & PROPERTY MARKET

Key economic indicators:

	Latest data	Pantheon Macroeconomics forecasts ¹	
		2020	2021
GDP growth	-2.0% (Q1 20)	-9.5%	8.0%
CPI inflation	0.5% (May 20)	0.6%	1.3%
Unemployment rate	3.9% (Feb-Apr)	6.7%	6.8%

¹Date of forecasts: 25th June 2020

COVID-19 in retreat, but risks remain

The COVID-19 outbreak appears to be in retreat. At its peak in April, more than 4,000 daily cases were being reported in the UK, but this has dropped to below 200 daily cases in late June. Nevertheless, there are risks that local flare-ups or even a full-blown second wave could occur as lockdown restrictions are eased. Indeed, the threat of a new wave of COVID-19 has been highlighted by a recent surge in US cases. The most significant risk, however, may be a second wave during the usual flu season between November and February, with the virus appearing to spread more easily in cold temperatures.

GDP implodes in April

Efforts to contain COVID-19 have wreaked havoc on the UK economy. GDP fell by 2.0% in Q1, but this period only included the very start of the lockdown. On a monthly basis, GDP decreased by a staggering 20.4% in April, the largest fall on record. Nearly every part of the economy contracted in April, with the hardest-hit areas being the air transport, car production, travel services, food & drink and accommodation sectors, all of which saw output fall by more than 80%, month-on-month.

Economy stabilising after historic drop

Purchasing Managers' Index (PMI) data indicates that April was the nadir of the economic downturn. The composite PMI plunged to an all-time low of 13.8 in April, before rising to 30.0 in May and 47.6 in June. The PMI reading for June suggests that the economy is now close to stabilising but, nonetheless, GDP is likely to have fallen by close to 20% across Q2 as a whole, which would make it comfortably the worst quarter on record.

Recovery in Q3, but challenges still ahead

A range of leading economic indicators, including the PMI data, suggest that the economy is set to return to growth in Q3. However, the initial recovery may be flattered by firms working through backlogs of orders accumulated during the lockdown, and it could slow thereafter. Measures aimed at containing COVID-19 will have a continued impact on many sectors of the economy, while the winding down of government support programmes could lead to job losses and businesses failures in H2. The economy is thus unlikely to have fully recovered by the year-end; Pantheon Macroeconomics forecast that GDP will still be around 5% lower in December compared with the pre-COVID peak in January.

Delayed impact in job market

The headline unemployment rate was unchanged at 3.9% in the three months to April, but the impact of the COVID-19 lockdown is clear in other, timelier labour market indicators. The number of employees on UK payrolls fell by 600,000 between March and May, while the claimant count increased by 126% to reach 2.8 million. In addition, 8.7 million workers have been furloughed under the government's Coronavirus Job Retention Scheme, and there could be significant job losses as this is gradually wound down in H2. The scheme is set to close at the end of October, with employers required to make contributions to wages from August.

Retail sales begin to rebound	Retail sales volumes rebounded by 12.0% in May, after falling by a record 18.1% in April. Nonetheless, sales were still 13.1% below February's pre-lockdown level. Highlighting the profound impact that the lockdown has had on retail activity, the online share of retail sales soared to a record 33.4% in May. The reopening of stores should help the continued recovery of retail sales over the coming months, although they may not reach pre-crisis volumes. There is evidence that households are saving increased shares of their incomes due to COVID-related uncertainty, while consumer spending could also be impacted by rising unemployment. The government is reportedly considering a temporary VAT cut to help kick-start spending in the second half of 2020.
Deflationary pressures grow	CPI inflation has dropped sharply from 1.8% in January to 0.5% in May. Higher food and drink prices provided the only significant upward pressure on inflation in May, and their impact was outweighed by falling fuel prices and price cuts made by lockdown-affected retailers attempting to shift excess stock. Inflation has the potential to remain very low over the rest of the year, with re-opening service sector firms needing to keep prices down in order to lure back customers. If it happens, the government's mooted VAT cut would also add to deflationary pressures.
Quantitative easing extended	With inflation dropping well below its 2% target, pressure has continued to mount on the Bank of England to take action to stimulate the economy. The Bank has already cut the base rate to a record low of 0.1%, and a £100bn extension to its quantitative easing (QE) programme was announced in June. The Bank's governor [REDACTED] Bailey has said that extreme measures such as negative interest rates cannot be ruled out, although, as yet, these are not actively under discussion.
Brexit takes a backseat	While Brexit has been largely pushed out of the headlines by the COVID-19 crisis, it is likely to rise back up the agenda by the year-end. In June, the UK formally rejected the option to extend the Brexit transition period beyond the end of December, leaving six months for a trade deal to be struck with the EU. If a deal is not agreed by the year-end, the UK would have to trade with the EU on WTO (World Trade Organization) terms from the start of 2021.
Investment to recover from Q2 low	The COVID-19 crisis brought an abrupt end to a short period of investment market optimism that followed the December general election. Although the UK investment volume was a respectable £12.9bn in Q1, 14% up on the same quarter in 2019, activity began to slow significantly in March. This trend has continued in Q2, with provisional figures from Property Data suggesting that volume will be circa £3bn, which would be comfortably the worst quarterly total on record. As with the wider economy, Q2 should prove to be the low point, with activity starting to recover in subsequent quarters as investors look to complete deals that were put on hold during lockdown.
COVID-19 impacts property returns	According to MSCI, the All Property total return has fallen by 3.9% since February. There was a sharp fall in the return in March (-2.0%), but the rate of decline eased in April (-1.3%) and May (-0.7%). The already embattled retail sector has been hardest hit by the COVID-19 lockdown, especially the shopping centre segment which has seen total returns fall by 18.5% over the last twelve months.



APPENDIX 2: FINANCIAL VIABILITY ASSESSMENT (LSH) – BASE SCENARIO

APPENDIX 3: OTHER FINANCIAL VIABILITY ASSESSMENTS (LSH) –
SCENARIOS 1 - 5

APPENDIX 4: PROPOSED SCHEME BUILD COST ANALYSIS (CORE 5)

APPENDIX 5: ECONOMIC AND MACRO PROPERTY MARKET COMMENTARY



[REDACTED]

From: [REDACTED] <[REDACTED]@ealing.gov.uk>
Sent: 24 August 2020 17:12
To: [REDACTED]
Cc: [REDACTED]
Subject: FW: Gurnell Stage 1 & FVA
Attachments: Financial Viability Assessment Gurnell Leisure Final COMPLETE.pdf

Dear [REDACTED]
I attach the LSH review of the James Brown FVA, for consideration in your Stage 1 Report.
Regards,
[REDACTED]

From: [REDACTED] <[REDACTED]@lsh.co.uk>
Sent: 24 August 2020 16:39
To: [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>
Cc: [REDACTED] <[REDACTED]@lsh.co.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@lsh.co.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>
Subject: RE: Gurnell Stage 1 & FVA

Afternoon all

Following on from the below, please see attached final report.

If there are any further issues please do let me know.

Kind Regards

[REDACTED]



[REDACTED] BA (Hons) MSc MRICS
Surveyor - Valuation
UK House, 180 Oxford Street, London, W1D 1NN
[REDACTED]
Email: [REDACTED]@lsh.co.uk

From: [REDACTED]
Sent: 24 August 2020 10:05
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Gurnell Stage 1 & FVA

Hi all

Apologies, [REDACTED].

I have just spoken to [REDACTED] and on reflection, following [REDACTED] comments last week RE removing the 'under offer' commentary from paragraph 5.32, we think it is also prudent to remove reference to affordable housing in table 5.27, as this no longer reads quite right. Affordable housing is dealt with in paragraph 5.32, with the purpose of 5.27 being to only refer to the private housing values.

If there are no further comments, I will get [REDACTED] to amend this and re-issue the report.

On [REDACTED] floor area comments, below, we have used the same floor areas as per JRB's and Core 5's analysis. For continuity I feel as though we should stick to the floor areas as referenced by JRB's FVA. Although floor areas might change, the quantum of build costs does not change.

Kind Regards

[REDACTED]

From: [REDACTED] [[mailto:\[REDACTED\]@ealing.gov.uk](mailto:[REDACTED]@ealing.gov.uk)]
Sent: 24 August 2020 09:17
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Gurnell Stage 1 & FVA

Hi [REDACTED]

In agreement with the mix used in LSH report, but appears to be a slight difference in areas (P9 para 3.6, P12 para 5.8)

	Block A (Nett sq. m)	Block B (Nett sq. m)
LSH report	6,580	5,631
WD accom schedule	6,548	5,653

I have attached a copy of the Wilmott Dixon spreadsheet where I have obtained these figures. I understand this is the current mix and areas Willmott Dixon are working to.

Apologies for last minute alert, was on leave Thursday and Friday last week.

Kind regards

[REDACTED]
Principal Project Manager
Ealing Council
[REDACTED]

From: [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>
Sent: 21 August 2020 16:36
To: [REDACTED] [REDACTED] <[REDACTED]@lsh.co.uk>; [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>
Cc: [REDACTED] [REDACTED] <[REDACTED]@lsh.co.uk>; [REDACTED] [REDACTED] <[REDACTED]@lsh.co.uk>; [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>
Subject: RE: Gurnell Stage 1 & FVA

Thank you [REDACTED]

All,
Can I ask you please to read over the report once more to ensure there are no inadvertent errors or corrections and advise me as soon as possible so that I can distribute to the GLA on Monday.
Regards,
[REDACTED]

From: [REDACTED] [REDACTED] <[REDACTED]@lsh.co.uk>
Sent: 21 August 2020 16:27
To: [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>
Cc: [REDACTED] [REDACTED] <[REDACTED]@lsh.co.uk>; [REDACTED] [REDACTED] <[REDACTED]@lsh.co.uk>
Subject: FW: Gurnell Stage 1 & FVA

On behalf of [REDACTED] [REDACTED] please find attached updated document on the above, which replaces the one sent at 13.45.

Kind regards.



[REDACTED] [REDACTED]
Secretary - Valuation
UK House, 180 Oxford Street, London, W1D 1NN
Direct: 020 3824 [REDACTED]
Office: 020 7198 2000
Email: [REDACTED]@lsh.co.uk

----- Original message -----

From: [REDACTED] <[REDACTED]@lsh.co.uk>

Date: 21/08/2020 13:45 (GMT+00:00)

To: [REDACTED] <[REDACTED]@ealing.gov.uk>, [REDACTED] <[REDACTED]@ealing.gov.uk>, [REDACTED]
<[REDACTED]@ealing.gov.uk>, [REDACTED] <[REDACTED]@ealing.gov.uk>, [REDACTED]
<[REDACTED]@ealing.gov.uk>, [REDACTED] <[REDACTED]@ealing.gov.uk>, [REDACTED]
<[REDACTED]@ealing.gov.uk>, [REDACTED] <[REDACTED]@ealing.gov.uk>

Cc: [REDACTED] <[REDACTED]@lsh.co.uk>

Subject: RE: Gurnell Stage 1 & FVA

Dear all

Please find attached our finalised FVA. It takes accounts of [REDACTED] last comments today.

I am on annual leave until 1st September, however if you have any queries, [REDACTED] [REDACTED] should be able to pick these up.

Kind regards

[REDACTED]

From: [REDACTED] [mailto:[REDACTED]@ealing.gov.uk]

Sent: 21 August 2020 11:40

To: [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]

Cc: [REDACTED]

Subject: RE: Gurnell Stage 1 & FVA

All,

A few track changes from me attached.

[REDACTED]

From: [REDACTED] <[REDACTED]@lsh.co.uk>

Sent: 20 August 2020 19:04

To: [REDACTED] <[REDACTED]@ealing.gov.uk>, [REDACTED] <[REDACTED]@ealing.gov.uk>, [REDACTED]
<[REDACTED]@ealing.gov.uk>, [REDACTED] <[REDACTED]@ealing.gov.uk>, [REDACTED]
<[REDACTED]@ealing.gov.uk>, [REDACTED] <[REDACTED]@ealing.gov.uk>, [REDACTED]

<[REDACTED]@ealing.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>
Cc: [REDACTED] <[REDACTED]@lsh.co.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED]
<[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; foirequests
<foirequests@ealing.gov.uk>
Subject: RE: Gurnell Stage 1 & FVA

Dear all

Please see our final draft. I will finalise the report tomorrow for submission, unless there are any last minute observations. I think that everything is addressed.

Kind regards

[REDACTED]

[REDACTED] [REDACTED] **FRICS ACIArb**
Director - Valuation
UK House, 180 Oxford Street, London, W1D 1NN
Direct: 020 7198 [REDACTED]
Office: 020 7198 2000
Email: [REDACTED]@lsh.co.uk

[Privacy Policy](#)

From: [REDACTED] [REDACTED] [mailto:[REDACTED]@ealing.gov.uk]
Sent: 20 August 2020 17:27
To: [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
Cc: [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] foirequests
Subject: RE: Gurnell Stage 1 & FVA

All,

Following my update call this afternoon with the GLA Case Officer, it is now more likely that the Stage 1 will go to the Mayor on 7th September to allow sufficient time for the GLA to receive and review the LSH report, which they must have please [REDACTED] by Monday 24th August.

[REDACTED]

Accordingly can I ask you please to complete the drafting updates as quickly as possible today/tomorrow so that I can have one last read through before I send to the GLA.

[REDACTED]

You will recall there is an FOI request to see the LSH review which, if that is the Council's view, will need to go on the Planning website as well. I'm not sure if we have yet responded to that request.

Regards,

[REDACTED]

From: [REDACTED]
Sent: 20 August 2020 16:41
To: [REDACTED] <[REDACTED][ealing.gov.uk](mailto:[REDACTED]@ealing.gov.uk)>; [REDACTED] <[REDACTED][ealing.gov.uk](mailto:[REDACTED]@ealing.gov.uk)>; [REDACTED]
[REDACTED] <[REDACTED][ealing.gov.uk](mailto:[REDACTED]@ealing.gov.uk)>; [REDACTED] <[REDACTED][ealing.gov.uk](mailto:[REDACTED]@ealing.gov.uk)>; [REDACTED]
<[REDACTED][ealing.gov.uk](mailto:[REDACTED]@ealing.gov.uk)>; [REDACTED] <[REDACTED][ealing.gov.uk](mailto:[REDACTED]@ealing.gov.uk)>; [REDACTED] <[REDACTED][ealing.gov.uk](mailto:[REDACTED]@ealing.gov.uk)>
Cc: [REDACTED] <[REDACTED][lsh.co.uk](mailto:[REDACTED]@lsh.co.uk)>; [REDACTED] <[REDACTED][lsh.co.uk](mailto:[REDACTED]@lsh.co.uk)>
Subject: RE: Gurnell -tenure mix

All,

Following our meeting last week, can I chase you please for confirmation that the attached schedule, which was produced by Ecoworld and has already been shared with the GLA, is correct and up to date.

The GLA Officer is looking to close his report for the Stage 1 referral and needs to confirm it as soon as possible please. It is important as well for [REDACTED] to conclude his review, which is now becoming a priority.

Regards,

[REDACTED]

From: [REDACTED]
Sent: 12 August 2020 17:13
To: [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED]
<[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED]
<[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>
Cc: [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED]
<[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED]
<[REDACTED]@ealing.gov.uk>
Subject: FW: Gurnell -tenure mix

All,

Following the discussion just now, attached is the affordable tenure/mix breakdown currently before us and GLA.

I have copied Housing in for information.

Regards,

[REDACTED]

From: [REDACTED]
Sent: 28 July 2020 14:42
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED]
<[REDACTED]@bartonwillmore.co.uk>; [REDACTED]
<[REDACTED]@ecoworldinternational.com>; [REDACTED] <[REDACTED]@bartonwillmore.co.uk>; [REDACTED]
<[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED]
<[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED]
<[REDACTED]@london.gov.uk>
Subject: RE: Gurnell GLA Stage 1 report update

[REDACTED]

I attach a table breaking down the occupancy of all of the residential blocks.

I will update you on the independent assessment.

Regards,

[REDACTED] [REDACTED]

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 27 July 2020 16:12
To: [REDACTED] [REDACTED] <[REDACTED]@bartonwillmore.co.uk>; [REDACTED] [REDACTED]
<[REDACTED]@ealing.gov.uk>; [REDACTED] [REDACTED] <[REDACTED]@ecoworldinternational.com>; [REDACTED] [REDACTED]
<[REDACTED]@bartonwillmore.co.uk>; [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED]
<[REDACTED]@london.gov.uk>
Subject: RE: Gurnell GLA Stage 1 report update

Hi [REDACTED]

It would be preferable to receive our independent assessment prior to completing my draft stage 1 but this would have an impact on our timescales perhaps, so I'd need to know when we'd likely receive it?

On point 2, I'd like to receive an table showing the unit size mix and habitable rooms by tenure, so I can verify the overall percentage affordable housing and tenure mix figures in the planning statement.

Thanks

[REDACTED] [REDACTED]

Principal Strategic Planner, Development Management

GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

0207 983 [REDACTED] | [REDACTED]

From: [REDACTED] <[REDACTED]@ealing.gov.uk>
Sent: 27 July 2020 11:28
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@ecoworldinternational.com>; [REDACTED] <[REDACTED]@bartonwillmore.co.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Gurnell GLA Stage 1 report update

[REDACTED]

Thank you for your email.

Can I confirm also from our conversation that:

1. given the significance of the facilitating development case to the very special circumstances Jane would want to be in possession of the Council's independent appraisal of the FVA to inform the Stage 1 report and
2. that she and you want better information on how the affordable housing in Blocks A and B will be apportioned to the relevant tenures.

Regards,

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 27 July 2020 11:19
To: [REDACTED] <[REDACTED]@ecoworldinternational.com>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@bartonwillmore.co.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: Gurnell GLA Stage 1 report update

Hi [REDACTED]

Thanks for taking my call on Friday, so this email is just to recap that my revised target for taking the Stage 1 report to the Mayor will be Monday 24 August.

If you could let me and Jane know when we are likely to receive your independent assessment of the FVA that would be appreciated.

Thanks

[REDACTED] [REDACTED]

Principal Strategic Planner, Development Management

GREATER**LONDON**AUTHORITY
City Hall, The Queen's Walk, London SE1 2AA

0207 983 [REDACTED] | [REDACTED]

[REDACTED]

From: [REDACTED] [REDACTED] <[REDACTED]ealing.gov.uk>
Sent: 21 August 2020 16:33
To: [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
Cc: [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]
Subject: Gurnell GLA Stage 1

[REDACTED]

I am advised by [REDACTED] [REDACTED] the case officer that the application is now likely to be reported to the Mayor on 7th September in order to allow time for receipt and consideration of the Council's independent review of James Brown's FVA.

Regards,

[REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 21 August 2020 09:43
To: [REDACTED]
Subject: RE: Gurnell - TfL

Hi [REDACTED]

It is [REDACTED] - [REDACTED]@tfl.gov.uk

[REDACTED]

From: [REDACTED] <[REDACTED]@ecoworldinternational.com>
Sent: 21 August 2020 09:41
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: Gurnell - TfL

Hi [REDACTED]

Please could you provide contact details for [REDACTED] from TfL, who you mentioned. Our transport consultant will then give him a call.

Thanks,

[REDACTED]

[REDACTED]

From: [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>
Sent: 21 August 2020 11:07
To: [REDACTED] [REDACTED]
Subject: RE: Gurnell - open space

I'll get clarification [REDACTED]
[REDACTED]

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 21 August 2020 10:03
To: [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>
Subject: RE: Gurnell - open space

Thanks [REDACTED]

In terms of built footprint and hardstanding, these figures differ from this, which I'd used for my Mol assessment. Assume I can continue to rely on the attached as the key metrics?
Same with play space – should I use the planning submission figures or these moderately different ones?
[REDACTED]

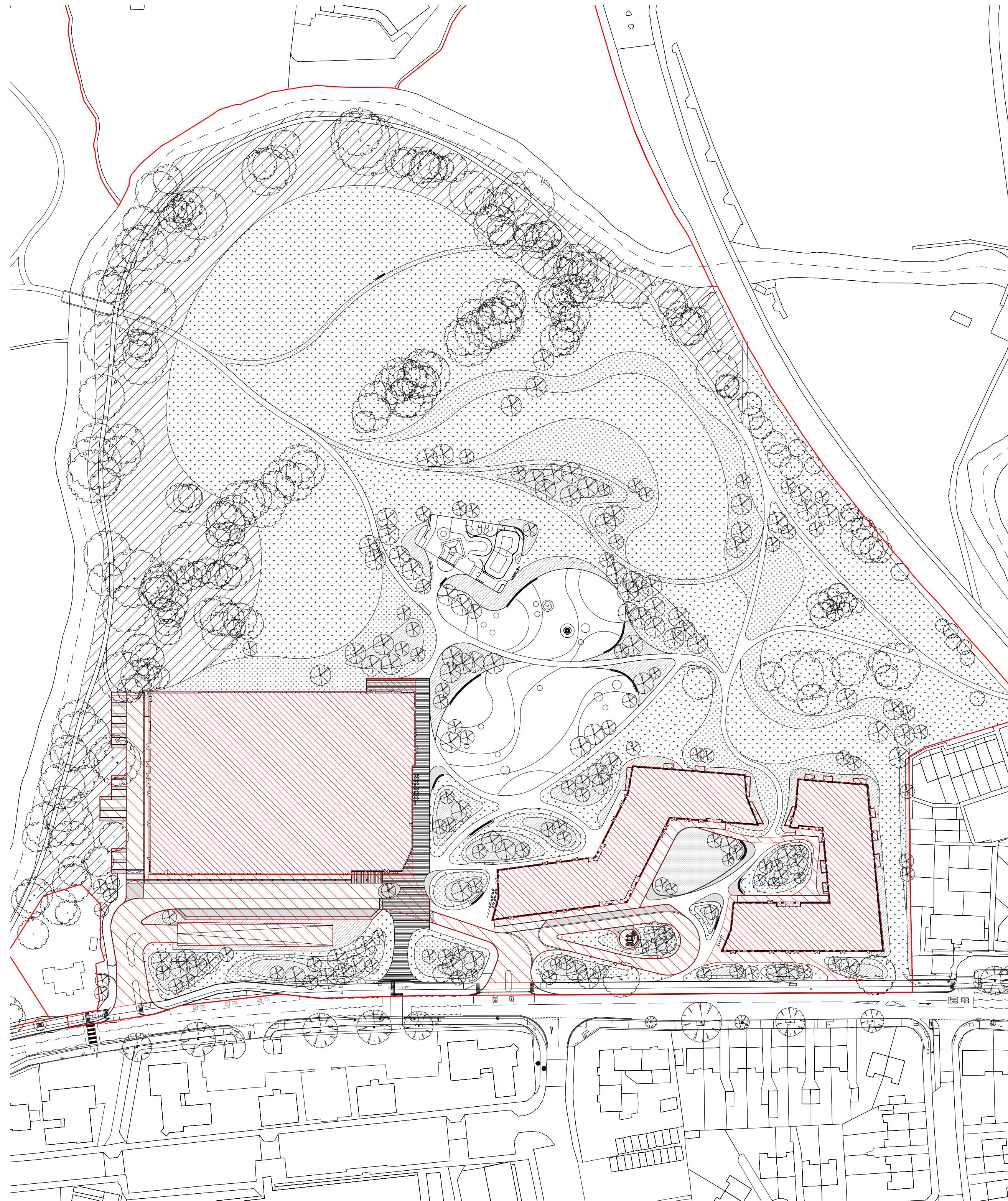
From: [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>
Sent: 20 August 2020 16:33
To: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Subject: Gurnell - open space

[REDACTED]

As discussed. The entry for the BMX track is wrong of course but excluded only because it is subject of a separate, concurrent, application and annotated only for illustrative purposes on the LC application.
Regards,
[REDACTED]

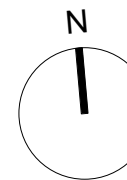


1 Existing site plan MOL
1:1000



2 Proposed Site Plan MOL
1:1000

Notes



- Existing GLC
= 3919 sqm
- Existing Footprint
= 14215 sqm
- Proposed Building Footprints
= 9549 sqm
- Total Proposed Footprint
= 14292 sqm

P08	14/02/20	Issue for Planning
P07	14/10/19	Landscape amendment to planning
P06	25/09/19	Minor amendments to planning
P05	13/09/19	Planning Submission
P04	09/10/19	Boundary Adjusted
P03	20/12/18	Minor Amendment
P02	20/12/18	Final Submission
P01	10/12/18	Planning

Revisions

Status
S4 / Planning

Client
BE:HERE EALING LIMITED

Project
Gurnell

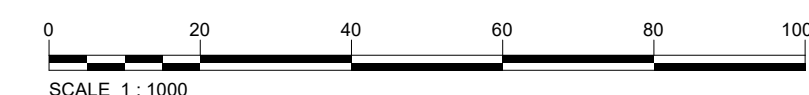
Title
Existing & Proposed MOL

Scale	Size	Date	Drawn	Checked
As indicated	A1	10/12/18	AV	MB

3DReid
www.3DReid.com
Architecture Interiors Masterplanning

3D
REID

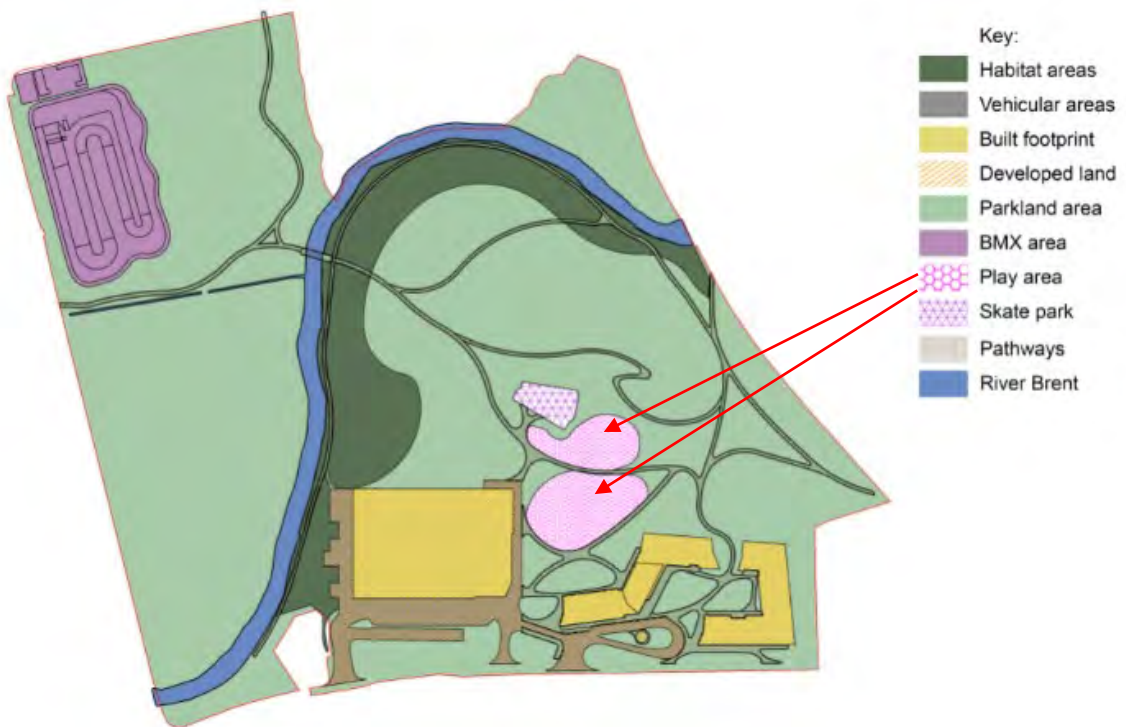
Drawing No. 180237-3DR-MP-00-DR-00103
Rev. P08



Existing



Proposed



1277 Gurnell Leisure Centre

Landscape Area Schedule

15/07/2020



WATERLOO COURT, 10 THEODORICAL, LONDON, SE1 8BJ
TEL: +44 (0)20 7603 9636

Area	Units	Existing Site	Proposed	Net change	% +/-
DEVELOPMENT					
Red Line area	sqm	75221	75221	0	+0%
Developed Land (total)	sqm	13909	14133	224	+2%
Built footprint areas (incl. cycle stores and covered walkways)	sqm	4458	9311	4853	+109%
Vehicular areas (outside built footprint)	sqm	9451	4822	-4629	-49%
Publically accessible space (total)		61312	62800	1488	+2%
Habitat areas (undergrowth/planting)	sqm	12236	11728	-508	-4%
Parkland areas	sqm	45495	45108	-387	-1%
Skatepark area	sqm	682	619	-63	-9%
Play area	sqm	1187	3633	2446	+206%
BMX track	sqm	1712	0	-1712	-100%

[REDACTED]

From: [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>
Sent: 07 August 2020 15:27
To: [REDACTED] [REDACTED]
Subject: RE: height of the existing building

I don't [REDACTED] but it would be useful to get a set to compare so I'll ask Ecoworld.

Regards,

From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 07 August 2020 15:16
To: [REDACTED] [REDACTED] <[REDACTED]@ealing.gov.uk>
Subject: height of the existing building

Hi [REDACTED]

Do you have a broad height range for the existing GLC building?

I see it's two storeys, but wonder what that equates to in metres..

Thanks

[REDACTED] [REDACTED]

Principal Strategic Planner, Development Management
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
0207 983 [REDACTED] | [REDACTED]

[REDACTED]

From: [REDACTED] <[REDACTED]@ealing.gov.uk>
Sent: 28 July 2020 14:42
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Gurnell GLA Stage 1 report update
Attachments: RE: Affordable housing tenure / mix

[REDACTED]

I attach a table breaking down the occupancy of all of the residential blocks.
I will update you on the independent assessment.

Regards,

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 27 July 2020 16:12
To: [REDACTED] <[REDACTED]@bartonwillmore.co.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@ecoworldinternational.com>; [REDACTED] <[REDACTED]@bartonwillmore.co.uk>; [REDACTED] <[REDACTED]@ealing.gov.uk>
Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Gurnell GLA Stage 1 report update

Hi [REDACTED]

It would be preferable to receive our independent assessment prior to completing my draft stage 1 but this would have an impact on our timescales perhaps, so I'd need to know when we'd likely receive it?

On point 2, I'd like to receive an table showing the unit size mix and habitable rooms by tenure, so I can verify the overall percentage affordable housing and tenure mix figures in the planning statement.

Thanks

[REDACTED]

Principal Strategic Planner, Development Management
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
0207 983 [REDACTED] | [REDACTED]

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

From: [REDACTED] <[REDACTED]@ealing.gov.uk>
Sent: 27 July 2020 11:28
To: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@ecoworldinternational.com>; [REDACTED] <[REDACTED]@bartonwillmore.co.uk>; [REDACTED]

<[REDACTED]@ealing.gov.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>

Subject: RE: Gurnell GLA Stage 1 report update

[REDACTED]
Thank you for your email.

Can I confirm also from our conversation that:

1. given the significance of the facilitating development case to the very special circumstances Jane would want to be in possession of the Council's independent appraisal of the FVA to inform the Stage 1 report and
2. that she and you want better information on how the affordable housing in Blocks A and B will be apportioned to the relevant tenures.

Regards,

From: [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 27 July 2020 11:19

To: [REDACTED] <[REDACTED]@ecoworldinternational.com>; [REDACTED] <[REDACTED]@ealing.gov.uk>; [REDACTED] <[REDACTED]@bartonwillmore.co.uk>

Cc: [REDACTED] <[REDACTED]@london.gov.uk>; [REDACTED] <[REDACTED]@london.gov.uk>

Subject: Gurnell GLA Stage 1 report update

Hi [REDACTED]

Thanks for taking my call on Friday, so this email is just to recap that my revised target for taking the Stage 1 report to the Mayor will be Monday 24 August.

If you could let me and [REDACTED] know when we are likely to receive your independent assessment of the FVA that would be appreciated.

Thanks

[REDACTED]
Principal Strategic Planner, Development Management
GREATERLONDONAUTHORITY
City Hall, The Queen's Walk, London SE1 2AA
0207 983 [REDACTED] | [REDACTED]

From: [REDACTED] <[REDACTED]@ecoworldinternational.com>
Sent: 27 July 2020 15:38
To: [REDACTED]
Subject: RE: Affordable housing tenure / mix

I hope that the tables below help clarify matters:

The private mix is as follows:

Private tenure	Buildings C-F	
Unit type	Quantum	Percentage
Studio	16	4.0%
1B2P	196	48.6%
2B3P	7	1.7%
2B4P	159	39.5%
3B4P	1	0.2%
3B5P	24	6.0%
Sub-Total	403	100.0%

The affordable mix is as follows:

London Affordable Rent	Buildings A	
Unit type	Quantum	Percentage
Studio	0	0.0%
1B2P	34	34.7%
2B3P	0	0.0%
2B4P	52	53.1%
3B4P	0	0.0%
3B5P	12	12.2%
Sub-Total	98	100.0%

Shared Ownership	Building B	
Unit type	Quantum	Percentage
Studio	17	17.3%
1B2P	33	33.7%
2B3P	14	14.3%
2B4P	34	34.7%
3B4P	0	0.0%
3B5P	0	0.0%
Sub-Total	98	100.0%

The combined mix is as follows:

Private tenure	Buildings A-F	
Unit type	Quantum	Percentage
Studio	33	5.5%
1B2P	263	43.9%
2B3P	21	3.5%
2B4P	245	40.9%
3B4P	1	0.2%
3B5P	36	6.0%
Sub-Total	599	100.0%

The affordable housing equates to 32.7% by unit number and 34.5% by habitable room. I expect that the reference to 35% is due to rounding.

Regards,

[REDACTED]

From: [REDACTED] <[REDACTED]@ealing.gov.uk>
Sent: 27 July 2020 15:18
To: [REDACTED] <[REDACTED]@ecoworldinternational.com>
Subject: Affordable housing tenure / mix

[REDACTED]

As briefly discussed, I've been contacted by planning who had a query around *"what level of affordable housing provision is now proposed as part of the submitted scheme, and how is this measured. The report (note – this may refer to an LSH report) both references 34% and 35%, although perhaps one is based on units and the other on hab rooms."*

If you have a simple table/document which clarifies this it would be appreciated if you could forward this.

Regards,

[REDACTED]

[REDACTED]

Assistant Director Capital Investment Programme
London Borough of Ealing

[REDACTED]

1/SW/7
Perceval House
14/16 Uxbridge Road

From: [redacted] <[redacted]@ecoworldinternational.com>
Sent: 28 July 2020 16:21
To: [redacted]
Subject: RE: Affordable housing tenure / mix

No problem [redacted] Let us know if you need anything else.

Kind regards,

From: [redacted] <[redacted]@london.gov.uk>
Sent: 28 July 2020 15:19
To: [redacted] <[redacted]@ecoworldinternational.com>; [redacted] <[redacted]@ealing.gov.uk>
Subject: RE: Affordable housing tenure / mix

Thanks [redacted]

From: [redacted] <[redacted]@ecoworldinternational.com>
Sent: 27 July 2020 15:38
To: [redacted] <[redacted]@ealing.gov.uk>
Subject: RE: Affordable housing tenure / mix

I hope that the tables below help clarify matters:

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3B4P	1	0.2%
3B5P	24	6.0%
Sub-Total	403	100.0%

The affordable mix is as follows:

London Affordable Rent	Buildings A	
Unit type	Quantum	Percentage
Studio	0	0.0%
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3B4P	0	0.0%
3B5P	12	12.2%
Sub-Total	98	100.0%

Shared Ownership	Building B	
Unit type	Quantum	Percentage
Studio	17	17.3%
1B2P	33	33.7%
2B3P	14	14.3%

2B4P	34	34.7%
3B4P	0	0.0%
3B5P	0	0.0%
Sub-Total	98	100.0%

The combined mix is as follows:

Private tenure	Buildings A-F	
Unit type	Quantum	Percentage
Studio	33	5.5%
1B2P	263	43.9%
2B3P	21	3.5%
2B4P	245	40.9%
3B4P	1	0.2%
3B5P	36	6.0%
Sub-Total	599	100.0%

The affordable housing equates to 32.7% by unit number and 34.5% by habitable room. I expect that the reference to 35% is due to rounding.

Regards,

[Redacted]

From: [Redacted] <[Redacted]@ealing.gov.uk>
Sent: 27 July 2020 15:18
To: [Redacted] <[Redacted]@ecoworldinternational.com>
Subject: Affordable housing tenure / mix

[Redacted]

As briefly discussed, I've been contacted by planning who had a query around "what level of affordable housing provision is now proposed as part of the submitted scheme, and how is this measured. The report (note – this may refer to an LSH report) both references 34% and 35%, although perhaps one is based on units and the other on hab rooms. "

If you have a simple table/document which clarifies this it would be appreciated if you could forward this.

Regards,

[Redacted]

[Redacted]

Assistant Director Capital Investment Programme
London Borough of Ealing

[Redacted]

1/SW/7
Perceval House
14/16 Uxbridge Road
London W5 2HL

[REDACTED]

From: [REDACTED]
Sent: 21 July 2020 12:06
To: [REDACTED]
Cc: [REDACTED]
Subject: RE: Gurnell Leisure Centre application

Hi [REDACTED]

I've drafted the majority of the report and received TfL comments yesterday (which I've not yet read). So should be in a position to finalise the draft report by Friday and take the stage 1 to the Mayor on 3 Aug.

[REDACTED] has reviewed the FVA and I have some initial internal comments, but not her formal assessment. [REDACTED] k so I would expect that it would now be possible for her review of the FVA could be sent out alongside my Stage 1 report.

Thanks
[REDACTED]

From: [REDACTED] <[REDACTED]@bartonwillmore.co.uk>
Sent: 21 July 2020 11:46
To: [REDACTED] <[REDACTED]@london.gov.uk>
Cc: [REDACTED] <[REDACTED]@ecoworldinternational.com>; [REDACTED]
<[REDACTED]@bartonwillmore.co.uk>
Subject: RE: Gurnell Leisure Centre application

Hi [REDACTED]

I hope you're well.

Are you able to provide an update on the Gurnell Leisure Centre Stage I process?

Have you had any internal GLA discussions on this application and when are you aiming to release the Stage I Report?

I think I picked up somewhere that the Stage I might be issued without a viability response. Is that still the case or not? As you can appreciate, the viability position is critical to the proposed development so it would be helpful to have the GLA's position on this.

Look forward to hearing from you.

Kind regards,

[REDACTED]
Director



[REDACTED]
[W: www.bartonwillmore.co.uk](http://www.bartonwillmore.co.uk)
7 Soho Square, London, W1D 3QB

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From: [REDACTED] [REDACTED] <[REDACTED]@london.gov.uk>

Sent: 08 June 2020 15:31

To: [REDACTED] [REDACTED] <[REDACTED]@ecoworldinternational.com>; [REDACTED] [REDACTED]
<[REDACTED]@bartonwillmore.co.uk>

Subject: Gurnell Leisure Centre application

Hi [REDACTED] [REDACTED]

We've now received the Stage 1 referral.

Would you be able to email me an electronic transfer of all the documents please.

Thanks

[REDACTED] [REDACTED]

Principal Strategic Planner, Development Management

GREATERLONDONAUTHORITY

City Hall, The Queen's Walk, London SE1 2AA

0207 983 [REDACTED] | [REDACTED]

[REDACTED]

From: [REDACTED]
Sent: 14 July 2020 14:38
To: [REDACTED]
Subject: RE: Gurnell Leisure Centre application

Hi [REDACTED]

In terms of timescales, I'm targeting the 27th July for my Stage 1 report.
Which I'm starting to draft as of today.

[REDACTED] in our in-house viability team is looking at the FVA and is on leave at the moment. We briefly discussed the FVA before she went on leave.

We can issue the Stage 1 prior to her internal assessment and your independent assessment being finalised.

[REDACTED]

From: [REDACTED] <[REDACTED]@ealing.gov.uk>
Sent: 14 July 2020 14:21
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Gurnell Leisure Centre application

Hi [REDACTED]

I have an internal update meeting tomorrow morning and would be grateful if you can let me know please what is your current expectation for the Stage 1 Report.

We have a consultant LSH looking at the FVA. Would you need to be in possession of his assessment beforehand?

Regards,

[REDACTED]

From: [REDACTED]
Sent: 07 July 2020 11:34
To: [REDACTED] <[REDACTED]@london.gov.uk>
Subject: RE: Gurnell Leisure Centre application

Hi [REDACTED]

Further to our call this morning, you can contact me on [REDACTED] as I am working from home.

Regards,

[REDACTED]

From: [REDACTED] <[REDACTED]@london.gov.uk>
Sent: 08 June 2020 15:31
To: [REDACTED] <[REDACTED]@ecoworldinternational.com>; [REDACTED]
<[REDACTED]@bartonwillmore.co.uk>
Subject: Gurnell Leisure Centre application

Hi [REDACTED]

We've now received the Stage 1 referral.

Would you be able to email me an electronic transfer of all the documents please.

Thanks