GREATERLONDON AUTHORITY

(By email)

Our Ref: MGLA250319-8616

13 May 2019

Dear

Thank you for your request for information which the GLA received on 25 March 2019. Your request has been dealt with under the Environmental Information Regulations (EIR) 2004.

You asked for;

I would like to request the following information in relation to the Gurnell Leisure Centre Redevelopment and the proposed housing development:

- a) A list of correspondence between the GLA and Ealing Council from 1 February 2018 up until the present (relating to the Gurnell redevelopment.)
- b) A list of correspondence between the GLA and EcoWorld or Be Living or Wilmott Dixon between February 2018 and the present (relating to the Gurnell redevelopment.)
- c) A copy of each of those correspondence and any attachments or documents for the same time frame.

Please find below a list of correspondence within scope of your request and attached to this response [Part 1]

Part A correspondence		
Page 1	24/01/2019 Email: FW: EcoWorld and Gurnell Leisure Centre - Ealing	
Page 2	29/03/2018 Email: Fwd: Gurnell Leisure Centre	
Page 3 - 4	29/03/2018 Email chain: RE: Gurnell Leisure centre	
Page 5 - 6	26/03/2018 Email chain: GLA/4287 Gurnell leisure centre - GLA pre-application	
	advice	
Page 7	23/02/2018 Email: Gurnell Lesiure Centre	
Page 8	08/02/2018 Email: Cancelled: Gurnell Leisure Centre & enabling development -	
	viability meeting	
Page 9	02/02/2018 Email: Gurnell & Kellogg Tower	
Part B correspondence		
Page 1 – 14	15/02/2019 GLA Assessment	
Page 15 - 17	20/04/2018 Email chain: GLA/4287 Gurnell leisure centre - GLA pre-application	
	advice	
Page 18 - 20	17/04/2018 Email chain: RE: GLA/4287 Gurnell leisure centre - GLA pre-	
	application advice	
Page 21 - 22	26/04/2018 Email chain: RE: GLA/4287 Gurnell leisure centre - GLA pre-	
	application advice	
Page 23 - 36	23/03/2018 GLA Assessment	

Page 36 - 38	20/03/2018 Email chain: Gurnell Leisure Centre: Report	
Page 39	09/03/2018 Email: Gurnell Leisure Centre	
Attachments		
	2018.04.09_Massing_Options_presentation [File ref: MGLA250319-8616 Part 2]	
	2018.08.29_Gurnell Leisure Presentation [File ref: MGLA250319-8616 Part 2]	
	2018.10.10_Gurnell Leisure Presentation_GLA [File ref: MGLA250319-8616 Part 4]	
	140192_Site Plan_Site Boundary [File ref: MGLA250319-8616 Part 2]	
	181109 Gurnell Leisure Centre Crib Sheet [File ref: MGLA250319-8616 Part 2]	
	Accommodation Schedule [File ref: MGLA250319-8616 Part 2]	
	Block Level Architectural Drawing Pack [File ref: MGLA250319-8616 Part 3]	
	copy_of_gla_carbon_emission_reporting_spreadsheet_v1.1 [File ref: MGLA250319-8616 Part 5]	
	Delivery & Servicing Plan [File ref: MGLA250319-8616 Part 6]	
	Design and Access Statement [File ref: MGLA250319-8616 Part 7]	
	Energy Assessment [File ref: MGLA250319-8616 Part 2]	
	Landscaping Drawing Pack [File ref: MGLA250319-8616 Part 8]	
	Residential Travel Plan [File ref: MGLA250319-8616 Part 2]	
	Sitewide Architectural Drawing Pack [File ref: MGLA250319-8616 Part 3]	
	Sustainability Statement [File ref: MGLA250319-8616 Part 2]	
	Transport Assessment [File ref: MGLA250319-8616 Part 9]	

Please note that some names of members of staff are exempt from disclosure under Regulation 13 (Personal information) of the EIR. This information could potentially identify specific employees and as such constitutes as personal data which is defined by Article 4(1) of the General Data Protection Regulation (GDPR) to mean any information relating to an identified or identifiable living individual. It is considered that disclosure of this information would contravene the first data protection principle under Article 5(1) of GDPR which states that Personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject.

Due to the number and file size of attachments, these have been placed directly on to our disclosure log:

https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information/foi-disclosure-log/eir-gurnell-leisure-centre-redevelopment

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

Yours sincerely

Paul Robinson Information Governance Officer

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

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

From:
Sent: 24 January 2019 16:42
To: ealing.gov.uk
Cc:

Subject: FW: EcoWorld and Gurnell Leisure Centre - Ealing

Hello Lucy

Juliemma has passed on your email regarding the pre-application meeting we held on Gurnell Leisure Centre, which took place on 11 Jan.

We haven't finalised or issued the pre-application advice note yet but I am currently drafting it, and it should be with the applicant by the end of next week. I'm happy to send it to you too when it's signed off.

Alongside Ecoworld and Barton Wilmore, the meeting was attended by and also and and and and the state of the

Thanks

Principal Strategic Planner

GREATERLONDONAUTHORITY

london.gov.uk

From: Lucy Taylor < <u>ealing.gov.uk</u>>

Sent: 24 January 2019 15:40

To: Juliemma McLoughlin < london.gov.uk>; Nick Taylor < london.gov.uk>

Cc: ealing.gov.uk>

Subject: EcoWorld and Gurnell Leisure Centre - Ealing

Dear Juliemma and Nick

Do you have a scheduled meeting with EcoWorld about Gurnell Leisure Centre next week?

Also Juliemma – I understand that EcoWorld had a pre-app with you – can we see the advice please.

Thanks

Lucy Taylor
Director of Regeneration and Planning
Ealing Council
Perceval House
14-16 Uxbridge Road
Ealing
W5 2HL

Tel: 0208 825

Mobile:

From: Juliemma McLoughlin Sent: 29 March 2018 12:09

To: Subject:

Fwd: Gurnell Leisure Centre

Sent from my iPhone

Begin forwarded message:

From: Juliemma McLoughlin < london.gov.uk>

Date: 21 February 2018 at 10:55:00 GMT

To: < london.gov.uk>

Subject: FW: Gurnell Leisure Centre

Kind Regards,

Juliemma McLoughlin

Chief Planner

Development, Enterprise & Environment

City Hall, London 0207 983

From: Lucy Taylor [mailto: ealing.gov.uk]

Sent: 21 February 2018 10:53

To: Juliemma McLoughlin < loop london.gov.uk>

Subject: RE: Gurnell Leisure Centre

Hi Juliemma – sorry I am in a Board meeting at 3.30pm. can we Spk at end of day – after 5pm?

Lucv

Sent from my Windows 10 phone

From: <u>Juliemma McLoughlin</u>
Sent: 21 February 2018 08:39

To: Lucy Taylor

Subject: Re: Gurnell Leisure Centre

I'll give you a call at 3.30 if that's ok. I'm back to back for most of the day.

Juliemma

Sent from my iPhone

On 20 Feb 2018, at 21:02, Lucy Taylor < ealing.gov.uk<mailto:

wrote:

Hi Juliemma

Can we have a quick chat about Gurnell Leisure Centre development.

When is a good time to call?

Thanks

Lucy Taylor

Acting Executive Director of Regeneration and Housing

From: Juliemma McLoughlin Sent: 29 March 2018 12:08

To: Subject:

Fwd: Gurnell Leisure centre

Sent from my iPhone

Begin forwarded message:

From: Lucy Taylor < ealing.gov.uk > Date: 16 January 2018 at 17:57:48 GMT

To: Juliemma McLoughlin < london.gov.uk>

Subject: RE: Gurnell Leisure centre

Hi Juliemma

Any update on Gurnell?

Also I am preparing a short presentation for Thursday – any tips on how to approach meeting?

- so not sure how this will pan out.

My key messages will be:

- 1. Ealing up for growth and meeting Housing targets
- -Large sites definitely on Board
- Small sites hard and have some problems with methodology (but don't want to spend this meeting talking about that)
- 2. Uplift and growth in Ealing
- -Southall
- Northolt
- -Estate regen uplift Acton Gardens
- 3. Council-owned site development
- -Gurnell Leisure Centre
- -Perceval House Council Offices
- other sites
- 4. Affordable Housing
- 5. Mixed use and Employment
- -opportunity to move some key employment sites to better locations more connected Park Royal, etc.

Thanks – maybe speak tomorrow

Lucy Taylor

Acting Executive Director of Regeneration and Housing

Ealing Council
Perceval House

14-16 Uxbridge Road

Ealing W5 2HL

ealing.gov.uk

From: Juliemma McLoughlin [mailto:

london.gov.uk]

Sent: 11 January 2018 09:15

To: Lucy Taylor < ealing.gov.uk>
Subject: Re: Gurnell Leisure centre

It's in my diary. I will get an update for you today.

Juliemma

Sent from my iPhone

On 11 Jan 2018, at 09:01, Lucy Taylor ealing.gov.uk<mailto: ealing.gov.uk>> wrote:

Dear Juliemma

Happy New year-hope all is well

Just wondered if you had any update on Gurnell Leisure centre pre-app – I understand we are waiting for the formal response.

I am conscious that Cllr Julian Bell and I are meeting James Murray and Jules Pipe next Thurs so would be good to know the position by then.

Will you be in that meeting? I was planning to talk more widely about Housing numbers, employment land, major development opportunities, etc.

Kind regards

Lucy Taylor
Acting Executive Director of Regeneration and Housing
Ealing Council
Perceval House
14-16 Uxbridge Road
Ealing
W5 2HL

ealing.gov.uk<mailto:

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<118011109004900967.gif>

From:	
Sent:	26 March 2018 10:58

To:

Subject: RE: GLA/4287 Gurnell leisure centre - GLA pre-application advice

Great, see you then.

From: [mailto: ealing.gov.uk]

Sent: 26 March 2018 10:56

To: | Iondon.gov.uk>

Subject: RE: GLA/4287 Gurnell leisure centre - GLA pre-application advice

Thanks

Yes Be sent through details of the workshop, and I've advised them that I can attend.

See you tomorrow.

Kind regards



Principal Planning Officer
Strategic Planning Team
Regeneration and Planning Services,
Regeneration and Housing Directorate
London Borough of Ealing

Tel: 0208-825- (Direct Dial) Email: ealing.gov.uk

From: [mailto: london.gov.uk]

Sent: 26 March 2018 10:32

To: < <u>ealing.gov.uk</u>>

Subject: FW: GLA/4287 Gurnell leisure centre - GLA pre-application advice



I've just forwarded you the meeting invite for the next design session tomorrow. I'm hoping that the applicant has already given you notice that this was due to take place. Please extend to other relevant colleagues as necessary.

Thanks



| Principal Strategic Planner | Development Management | Development, Enterprise &

Environment

GREATER LONDON AUTHORITY | 4th Floor, City Hall, The Queen's Walk, London SE1 2AA

Tel: 020 7983 | Email: london.gov.uk

From: Sent: 23 March 2018 17:09 To:
Dear all
Please find attached our pre-app advice report. We look forward to catching up at the design session next week.
Kind regards
Principal Strategic Planner Development Management Development, Enterprise & Environment GREATER LONDON AUTHORITY 4th Floor, City Hall, The Queen's Walk, London SE1 2AA Tel: 020 7983 Fax: 020 7983 Email: Iondon.gov.uk
If you're not on the electoral register, you won't be able to vote in local authority elections this May. You must have registered to have your say. Find out more at https://www.yourvotematters.co.uk/
#LondonIsOpen
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From: ealing.gov.uk>
Sent: 23 February 2018 10:25

To:

Subject: Gurnell Lesiure Centre

Hi

I just wanted to touch base to find out when you think you might be in a position to be able to issue your written response on the pre-app for Gurnell Leisure Centre.

When we last spoke I think you mentioned that you were considering whether there might be value in having a second design review workshop/session. Is that still the intention?

Thanks

Principal Planning Officer
Strategic Planning Team
Regeneration and Planning Services,
Regeneration and Housing Directorate
London Borough of Ealing

Tel: 0208-825- (Direct Dial) Email: ealing.gov.uk

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From: Sent: To:	na.aov.uk> 08 February 2018 09:37			
Subject:	Re: Canceled: Gurnell Leisure Centre & enabling development - viability meeting			
Thanks for the u	update			
> On 7 Feb 2018 >	3, at 19:21, Iondon.gov.uk> wrote:			
> Deferred to a >	later date, pending agreement on the design approach			
•	on the electoral register, you won't be able to vote in velections this May. You must have registered to have out more at			
> https://www.	yourvotematters.co.uk/ <https: www.yourvotematters.co.uk=""></https:>			
> GREATER LON > The information > materials. For > https://www.	> #LondonIsOpen > GREATER LONDON AUTHORITY NOTICE: > The information in this email may contain confidential or privileged > materials. For more information see > https://www.london.gov.uk/about-us/email-notice <https: www.london.gov=""> .uk/about-us/email-notice>/ > <meeting.ics></meeting.ics></https:>			
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RhNj+DTJvqD6DunSc2+gYjXA== to report this email as spam.

From:
Sent: 02 February 2018 12:00
To: 02 February 2018 12:00
Gurnell & Kellogg Tower



We briefed the Deputy Mayor for planning on both of the above yesterday afternoon. Let me know when you have a bit of time for a call and I can relay the respective steers.

Kind regards

| Principal Strategic Planner | Development & Projects | Development, Enterprise & Environment

GREATER LONDON AUTHORITY | 4th Floor, City Hall, The Queen's Walk, London SE1 2AA

Tel: 020 7983 | Fax: 020 7983 | Email: | Iondon.gov.uk

GREATERLONDON AUTHORITY

Barton Willmore 7 Soho Square London W1D 3OB Our reference: GLA/4287/ADR Date: 15 February 2019

Dear

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

Gurnell Leisure Centre, Ruislip Road East London Borough of Ealing Our reference: GLA/4287/ADR

Further to the pre-planning application meeting held on 11 January 2019, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

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

Yours sincerely,



John Finlayson
Head of Development Management

GREATER LONDON AUTHORITY

pre-application report GLA/4287/02 15 February 2019

Gurnell Leisure Centre, Ruislip Road East

in the London Borough of Ealing

The proposal

Mixed use redevelopment of the site to provide a replacement leisure centre, 615 residential units, 498 sq.m. of commercial floorspace (Class A1-A3 use) a replacement BMX track, skate park and children's playground, enhancements to the existing park, together with associated car parking, coach parking, cycle parking, refuse storage, access and servicing and public realm.

The applicant

The applicant is **Eco World and LB Ealing Council** and the architect is **3D REID**.

Context

On 11 January 2019, a follow-up pre-planning application meeting to discuss redevelopment proposals for the above site was held at City Hall, with the following attendees:

GLA group

- Principal Strategic Planner, GLA (case officer)
- Principal Strategic Planner (Urban Design), GLA
- Team Leader, GLA
- , GLA Energy Team
- Transport for London

Applicant team

- EcoWorld (Client)
- Barton Willmore (Planning)
- Barton Willmore (Planning)
- Couch Perry Wilkes (Energy and Mechanical Engineering)
- Couch Perry Wilkes (Energy and Mechanical Engineering)
- 3D Reid (Architect)
- 3D Reid (Architect)
- Systra (Transport)

Local Planning Authority

- Adam Whalley LB Ealing (Assistant Director Capital Investment Programme)
- LB Ealing (Principal Planning Officer)

This followed an initial pre-application meeting on redevelopment proposals which took place on 20 October 2017, for which a pre-application response was issued by the GLA (Ref. GLA/4287, dated 23 March 2018. Subsequent informal 'follow up' meetings and design workshops took place with GLA officers on 27 March, 24 August and 9 October 2018, which have informed the current proposals.

Summary of meeting discussion

- The purpose of the follow-up meeting was to allow the applicant's team to provide an update on further design revisions to the proposed scheme since the initial pre-application meeting and follow-up meetings and to discuss a range of outstanding matters relating to the principle of development; housing and affordable housing; urban design; climate change; and transport. The latest proposals contained within the pre-application document submitted to the GLA on 20 December 2018 forms the basis of this response. This response should be read alongside the initial pre-application advice.
- 4 The advice given by officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of the application.

Site description

- The 13.2 hectare site is located in the Brent River Park within designated Metropolitan Open Land (MOL) and comprises the Gurnell Leisure Centre and surface car park, an adventure playground, BMX track, skate park, grass playing fields and adjacent parkland. It is bounded by Ruislip Road East to the south; Stockdove Way to the north; and Argyle Road and Peal Gardens to the east. The western boundary of the site is defined by a north-south pedestrian/cycle route and tree line which runs alongside the elevated railway. The site boundary excludes the allotment site and Ealing Mencap facility on Stockdove Road.
- Areas of the site which are proposed to accommodate buildings in residential, leisure and commercial use have a Public Transport Access Level (PTAL) of 3, on a scale of 0 to 6b where 6b denotes the most accessible locations in the capital. Perivale London Underground Station (Central Line) is 1.8 kilometres to the north of the site. Castle Bar Park station and South Greenford Station are within a shorter 10 to 20 minutes walk to the south and north respectively and provide services into Paddington. From this service passengers will be able to change onto the Elizabeth Line at West Ealing (from late 2019). Five bus services are available on Ruislip Road East, with a further bus service available on Argyle Road.
- The existing Gurnell Leisure Centre includes a six lane 50 metre swimming pool (which can be split to provide two separate pools using movable dividers) a spectator seating, a fun pool, gym and fitness studio spaces. Gurnell is one of only four locations in London which provide a 50 metre swimming pool, and is currently home to the largest swimming club in the capital. This part of the Brent Valley is a key focus for the Borough's strategic sporting facilities, which also includes the nearby Perivale Athletics Track. Collectively, these facilities perform a function which is of considerable significance within the west London sub-region.

Context and case history

8 Originally completed in 1981, the leisure centre building is now in need of significant repair and refurbishment and falls considerably short of contemporary approaches to inclusive design and disabled access. Estimates for the cost of refurbishing the existing leisure centre suggest this could

be approximately 80% of the total cost of the demolition and redevelopment of the site to provide a new modern facility, hence this approach is considered prohibitively expensive, without providing scope for enabling development. In March 2015, LB Ealing Council's Cabinet resolved to demolish the existing leisure centre and replace it with modern facility. A number of public consultation events have been undertaken since this time and users of the facility have been informed that the existing centre is expected to close in September 2019.

- 9 The GLA's pre-application advice note issued on 23 March 2018 set out support for the principle of an enhanced indoor and outdoor sporting facilities on the site and accepted the need for a new leisure centre; however, in view of the site's MOL designation, GLA officers confirmed that the applicant must demonstrate that very special circumstances exist which outweigh the harm caused to the openness of the MOL and any other harm. The applicant was required to redesign the layout of the scheme to minimise the amount of inappropriate development and harm to openness as far as possible through good design and by avoiding encroachment into 'greenfield' MOL and focusing additional enabling development on previously developed parts of the site adjacent to Ruislip Road East. In addition, the applicant was advised that the scheme should provide:
 - significant enhancements to the quality, use and enjoyment of the park in terms of accessibility, outdoor sporting facilities, landscaping and biodiversity improvements, whilst also avoiding any unacceptable deficiency in local open space provision; and
 - a significant affordable housing offer would positively contribute as part of a wider package of public benefits to support the applicant's case for very special circumstances and suggested that the applicant pursue all available funding sources, given the costs associated with the scheme and the site constraints highlighted above.

Details of the proposal

- The scheme proposes the mixed use redevelopment of the site to provide a replacement leisure centre, 615 residential units, 498 sq.m. of commercial floorspace (Class A1-A3 use) a replacement BMX track, skate park and children's playspace, enhancements to the existing park, together with associated car parking, coach parking, cycle parking, refuse storage, access and servicing and public realm. Residential units would comprise a mix of private sale and private Build to Rent units.
- The latest proposed design and layout of the scheme has emerged following an extensive iterative process of design scrutiny involving GLA and Ealing Council officers and is shown below in Figure 2. A modernised and enhanced leisure centre would be provided on the site of the existing facility, with the building rotated to align with Ruislip Road East. The new facility would be arranged over three levels, with pools and changing facilities on the ground floor. Gym and fitness studios would be provided on levels one and two, overlooking Ruislip Road East. In addition, a cafe and soft play centre would be provided at ground floor level on the eastern flank of the building. Two 15 storey residential blocks (A & B) would sit on either side of the building which are intended for private rental accommodation.
- An open courtyard block would be constructed on the existing car park, with buildings ranging in height from 17, 13, 10 and 6 storeys. Commercial and residential amenity floorspace and cycle parking and refuse facilities would be provided at ground floor level with residential units intended for private sale above. The open courtyard design would allow for public access through into the park via a landscaped courtyard. A new civic square would be formed in the central space between the two main development parcels. This would be fronted by cafe and leisure uses and would bleed into the adjacent children's playground and park. This new civic space would provide the main gateway entrance into the MOL to the north. A basement car park

would be provided which would be accessed via a ramp in front of the leisure centre building. Coach parking facilities would also be provided along this frontage.

Figure 2 -



Principle of development

- The site lies wholly within land designated as Metropolitan Open Land (MOL), which London Plan Policy 7.17 and Policy G3 of the draft London Plan state should be afforded the same planning policy status and level of protection as the Green Belt, in accordance with the 2018 National Planning Policy Framework (NPPF). As previously confirmed, the proposed development would be classified as 'inappropriate development' given that the replacement buildings would be materially larger and would have a significantly greater impact on the openness of the MOL. Accordingly, the NPPF exceptions would not apply and the applicant must demonstrate that there are 'very special circumstances' which clearly outweigh the potential harm to the MOL and any other harm caused.
- The NPPF paragraph 144 states that when assessing this, planning decision makers should give ensure substantial weight is given to any harm to the Green Belt (or in this instance, the MOL). Recent case law has established that the case for very special circumstances is essentially a planning balance which should be judged by a decision-maker taking into account the circumstances of an application and the term 'any other harm' is not limited to harm to the Green Belt but can also take into account other factors¹.
- As set out above, the principle of redeveloping the existing facility is strongly supported given its current condition and the significant costs associated with its repair and refurbishment. Furthermore, the provision of an enhanced replacement sporting facility to maintain and strengthen the sub-regional role served by the existing facility is strongly supported, in accordance with London Plan Policy 3.19 and Policy S5 of the draft London Plan. The Council has previously provided an assessment of alternative sites across which is welcomed and this demonstrates that no alternative and suitably sized sites are available within the borough, which would be preferential in planning policy constraints.

¹ Redhill Aerodrome Ltd. v Secretary of State for Communities and Local Government (Court of Appeal, 24 October 2014)

- The requirement for the replacement leisure centre to be cross-subsidised by a significant quantum of enabling residential development is also accepted given the costs of providing the new facility and lack of available public funding. Whilst a detailed cost estimate for the facility will be provided as part of the applicant's Financial Viability Assessment, GLA officers understand that the total cost of providing the indoor and outdoor leisure facilities on site is estimated to be £37.7 million and, even once the proposed enabling residential development is accounted for, there is still expected to be a significant financial deficit within the scheme. To plug this funding gap, the Council is expected to contribute £12.5 million towards the scheme.
- GLA officers welcome the further productive engagement that has taken place between the applicant, Council and GLA via a number of design workshops. As set out in more detail under urban design, the applicant has responded positively to the GLA's initial pre-application advice set out above by substantially amending the original masterplan proposals to reduce the net loss of 'greenfield' MOL and a comprehensive scheme for the enhancement of the MOL parkland is proposed, which is welcomed. Whilst the viability and site constraints highlighted above are recognised, a significant affordable housing offer is considered to be a key component of the required package of public benefits associated with the scheme in order to justify the applicant's case for very special circumstances, given the scale and density of the scheme.

Open space

Overall, GLA officers consider that the scheme would provide a comprehensive package of enhancements to the MOL, which would provide replacement outdoor recreational, sporting and play facilities and significant improvements in terms of biodiversity, landscape and accessibility enhancements, which is strongly supported. As previously requested, the applicant should provide an assessment of the overall land-take of buildings and areas of hard-standing to allow for the proposal to be compared to the existing situation. Publicly accessible paths and routes that provide access to and support the outdoor recreational enjoyment of the park/MOL should be assessed but would not count towards the overall MOL land-take. In addition to this, the reprovided green space should be assessed against the Urban Greening Factor (UGF) as set out in Table 8.2 and Policy G5 of the draft London Plan. This should include a UGF assessment of the existing site and proposed development. GLA officers can provide worked case study examples of UGF assessments should this be required by the applicant. It is noted that playing pitches will be lost as a result of the proposals; however, GLA officers note that additional playing pitch capacity is being delivered in the borough, for example at Gunnersbury Park. GLA officers would therefore welcome further discussion on this issue as well as further information on the phasing of the scheme.

Housing and affordable housing

Affordable housing

London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 seek to maximise the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy H6 of the draft London Plan identifies a minimum threshold of 50% affordable housing (by habitable room) for sites such as this, which are in public ownership. Applications that meet or exceed the relevant threshold level of affordable housing without public subsidy, providing an appropriate tenure split, and which meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor can follow the 'Fast Track Route' set out in the draft London Plan and SPG. Fast Track applications are not required to submit a viability assessment or be subject to a late stage viability review.

- Where an application is not eligible for the 'Fast Track Route' it must follow the 'viability tested route'. This means that a Financial Viability Appraisal (FVA) must be submitted in a standardised format which will be rigorously assessed by GLA officers in consultation with the Council and its advisers to ensure that the maximum level of affordable housing is being delivered, using the methodology and assumptions set out in the draft London Plan and the SPG. Applications following the 'viability tested route' will be subject to both an early and late stage viability review, in line with the standard review mechanism formula set out in the Mayor's Affordable Housing and Viability SPG, with any surplus profit used to deliver on-site affordable housing.
- As discussed during meeting, the applicant stated that, given the significant costs associated with replacement leisure centre, the current scheme generates a deficit and is consequently not able to support any affordable housing provision. In view of the scale and density of the proposed development, a zero percent affordable housing offer undermines the wider package of public benefits associated with the scheme and the applicant's case for very special circumstances. This will need to be supported robustly by the applicant's Financial Viability Appraisal (FVA), which would be subject to GLA scrutiny and independent review by the borough to verify these claims and demonstrate that the scheme is delivering the maximum viable level of affordable housing, without grant.
- During the meeting, GLA planning officers and the applicant discussed the potential for GLA grant funding to be assigned to the scheme via the Mayor's Building Council Homes for Londoners Programme, which is strongly supported. GLA planning officers understand that an indicative grant allocation of £100,000 per unit could help fund London Affordable Rent (LAR) units within Block A, by enabling this entire block to be purchased by the Council's wholly owned subsidiary housing company 'Broadway Living'. This would ensure the scheme delivers approximately 18% affordable housing. GLA officers would be strongly supportive of this and approach which would respond positively to the GLA's initial pre-application advice note. This recognised that the potential quantum of enabling residential development is limited due to the site's MOL designation and therefore advised the applicant to ensure that alternative sources of funding is secured to deliver affordable housing within the scheme.
- GLA officers would welcome early discussion on the FVA, once the costs associated with the scheme have been finalised. The FVA would need to demonstrate that grant funding is being used to deliver affordable housing which is additional to the viability position of the scheme. Furthermore, there should be further discussion on how the above affordable housing is secured by way of Section 106 Agreement given that this is likely to play an important role in demonstrating the very special circumstances.

Build to Rent units

A covenant must be applied to the proposed Build to Rent units in accordance with Policy H13 of the draft London Plan, the Mayor's Affordable Housing and Viability SPG, and Policy 3.8 of the London Plan. The covenant must be for a minimum of 15 years and must be secured in the Section 106 agreement. In addition, the DMR affordable homes must be secured in perpetuity via Section 106. Furthermore, and for the avoidance of doubt, the Section 106 must also secure the inclusion of a clawback mechanism (to recoup affordable housing contributions in the event of the covenant being broken and units being sold as open market sale). Other provisions, including unified ownership and management, length of tenancy and certainty over rent levels, must also be secured in accordance with Policy H12 of the draft London Plan.

Housing choice

- London Plan Policy 3.8 and Policy H12 of the draft London Plan encourages new developments to offer a range of housing choices in terms of mix and unit size. To achieve this overarching objective, Policy H12 of the draft London Plan sets out a range of factors to be considered when determining the appropriate housing mix on a particular scheme and advises against prescriptive dwelling size mix requirements being applied to market and intermediate homes, but should provide guidance on the size of affordable and social rent units required, taking into account evidence of local need.
- The proposed housing mix is set out in Table 1 below and is considered acceptable in strategic planning terms, having regard to London Plan Policy 3.8 and Policy H12 of the draft London Plan and taking into account the density and land use mix proposed, the location and PTAL of the site and the significant Build to Rent component within the scheme. Notwithstanding this, GLA officers note that, subject to grant funding being available, Block A which includes 24 studio sized units is proposed to change tenure to London Affordable Rent. The final size mix within this block should therefore be subject to further discussion to ensure a greater proportion of family sized units and reduced percentage of studio units within the block's mix.

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Table 1	– pro	posed	hοι	ısınq	mix

Unit size	Units	%
Studio	61	10%
1 bed	276	45%
2 bed	243	40%
3 bed	35	6%
Total	615	100%

Children's play space

- Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Policy S4 of the draft London Plan states residential developments should incorporate high quality, accessible play provision for all ages, of at least 10 sq.m per child. Play space provision should normally be provided on-site; however, off-site provision may be acceptable where it can be demonstrated that this addresses the needs of the development and can be provided nearby within an accessible and safe walking distances, and in these circumstances contributions to off-site provision should be secured by Section 106 agreement.
- Based on the proposed housing mix and the GLA's play space calculator, a potential child yield of 40 can be expected, resulting in a requirement for 398 sq.m. of dedicated play space. The applicant has stated that this requirement would be added to the existing play provision on site (1,188 sq.m.) thereby yielding a total play space requirement of 1,586 sqm. The applicant has stated that this would be met on-site, which is welcomed and the emerging play space strategy, which makes the most of the parkland to provide a substantial public play space as a central focal point for the scheme is strongly supported. The application documents should provide plans setting out the existing and proposed provision in terms of sq.m.

Urban design

- As set out above, the GLA's initial pre-application advice note set out a number of high level design objectives for the scheme. These included the need for the proposal to:
 - minimise inappropriate development on MOL and the impact on MOL openness by focusing development on previously developed part of the site;
 - preserve a coherent expanse of green space and to support a defensible permanent MOL boundary;
 - deliver significant enhancements to the MOL in terms of accessibility, outdoor sporting facilities, landscaping and biodiversity improvements; and
 - form an appropriate relationship with the adjacent residential properties and Ruislip Road East.
- Overall, it is considered that these objectives have been positively addressed by the applicant and GLA officers are supportive of the proposed design revisions which have significantly improved the overall design quality of the scheme. However, this advice note raises a number of concerns in respect of residential quality, as set out below, which must be addressed in the submitted application.

Height and massing and impacts on openness of the MOL

- Currently the openness of the MOL is characterised by east-west visual permeability and this is defined by the location of the existing leisure centre and car park, which broadly frames the more open undeveloped parkland to the north, but also by the wider landscape setting of this section of the Brent Valley Park in this location, which broadly follows the course of the River Brent.
- 32 GLA officers strongly support the revisions to the scheme which significantly reduce the extent of the land take and harm to the MOL which was associated with the previously proposed linear 'finger' blocks. Whilst these free-standing blocks sought to maintain a degree of visual permeability through into the landscape, their built footprint would have protruded significantly into the undeveloped 'greenfield' areas of MOL. GLA officers consider that this initial design would have had a greater impact on the MOL openness compared to the current proposal. The current proposal provides a stronger urban edge to the park and strengthens the townscape character and legibility of Ruislip Road East, whilst also enabling the provision of a central civic square and gateway through into the park, which is strongly supported. Recent refinements to the scheme which create a more open courtyard block, helps to maximise connectivity and visual permeability through into the park and seek to maximise the amount of daylight and sunlight received within the courtyard and residential units, which is also supported.
- The scale of the development would evidently constitute a step-change in terms of the prevailing building heights in the area and would clearly impact the sense of openness within the MOL; however, GLA officers consider that the current proposal strikes an appropriate balance between providing sufficient enabling residential development, ensuring good design and restricting the extent of development to the previously developed parts of the site in order to minimise harm to the MOL.
- The application site is a significant distance from designated heritage assets, with the nearest being the Cuckoo Estate Conservation Area, which is found on the western side of the railway to the south. The surrounding building heights also varies significantly from two storey suburban properties to four and five storey blocks of flats and maisonettes, together with three 11 storey residential towers. Subject to more detailed assessment of the townscape / visual impacts

and daylight and sunlight, the height and massing of the scheme is supported. The applicant should, however, consider further refinements to the massing of Blocks C and D to provide greater differentiation in the heights and massing of these buildings, given the potential for these facing block to have a slab like appearance when viewed from the MOL and Ruislip Road East.

Design, layout and public realm

- The extension of Block C towards the leisure centre building is welcomed as this helps to enclose and animate the proposed civic square, whilst broadly following the extent of the existing hard-standing, as previously requested. The main entrance to the leisure facility would provide a more legible and accessible entrance at the centre of the scheme, with a range of more active uses clustered around the civic square, with the potential for outdoor cafe seating. The proposal for the civic square to comprise durable hard landscaping with large areas of additional soft landscaping is supported as this would allow the space to be well-used and active all year round.
- There are a number of areas of dead frontage associated with changing facilities, plant, cycle parking and refuse and recycling storage facilities at ground floor level within the scheme, particularly on the building facades facing the east and western boundary of the site but also facing Ruislip Road East. The potential to minimise these areas has been explored with the applicant as part of design workshops and it is accepted that in most instances, these cannot be significantly reduced without sinking these facilities to basement level, which would create significant costs; or in the case of the children's pool would give rise to privacy concerns. The applicant has generally provided these less active uses in the most preferable locations to avoid these areas negatively impacting the quality of more important areas of the public realm, which is welcomed. The applicant should, however, ensure that dead frontages are mitigated further by through the provision of a landscaping strip and/or the selection of appropriate and high quality facing materials, especially where these face Ruislip Road East.
- The residential core within Block B is relatively remote given its location adjacent to the park, which raises concerns in terms of safety and security after dark. The potential to relocate the core so that it sits next to the cafe and civic square should be considered, subject to the internal layout constraints, and an appropriate lighting strategy provided. The applicant should also demonstrate how vehicles access across the shared surface space will be managed and designed to ensure that vehicle movements do not compromise pedestrian and cycle safety, taking into account further comments under inclusive design. The servicing and delivery strategy should be confirmed in relation to Blocks B, E and F as this is unclear, given that the proposed delivery and drop off bays are a significant distance from the residential cores.

Residential quality

- London Plan Policy 3.5 and draft London Plan Policy D4 promote quality in new housing provision and set out minimum standards which apply to all tenures of self-contained residential accommodation, with further standards and guidance set out in the Mayor's Housing SPG (2016).
- In total, 40% of the residential units would be dual aspect and 60% single aspect. The majority of single aspect units are east or west facing; however, 14% would be single aspect north facing (88 units). During the meeting, the applicant stated that the vast majority of the north facing single aspect units would face the Brent River Park and would therefore benefit from an attractive and open outlook, many of which would be elevated to ensure appropriate levels of daylight. This is accepted. Furthermore, GLA officers note that the number of single aspect units, including those which are north facing has increased following the amendments of the scheme to provide a perimeter courtyard block as opposed to the applicant's original proposal, which comprised linear finger blocks arranged on a north-south axis.

- Accordingly, GLA officers do not object to the provision of north facing single aspect units fronting the park and, in general, consider that the applicant has minimised the number of single aspect units as far as possible, in line with Policy D4 of the Draft London Plan, in view of the site constraints and requirement for higher density enabling development. Further design mitigation measures should also be incorporated within the scheme to ensure all north facing single aspect units benefit from the provision of higher floor to ceiling heights and/or long and shallow floor plans. This is particularly the case for the north facing single aspect units within Block E, as these would have a more restricted outlook, given the proposed scale of the facing courtyard blocks to the north.
- As set out in Policy D4 of the draft London Plan and the 2016 Housing SPG a minimum of 5 sq.m. of private outdoor space should be provided for all 1 bed dwellings with an extra 1 sq.m. of private amenity space added for each anticipated additional occupant. The applicant has stated that 4% of the proposed residential units would not have private outdoor amenity space (24 units). This includes 14 units at ground level, where the applicant considers that it is more preferable to provide avoid projecting balconies or terraces due to the impact on the MOL and for safety and security reasons. The corner units within Blocks D and E would also lack balconies on floors 1 to 5 which the applicant states this is due to concerns about the privacy and daylight impacts. This must be justified in more detail as part of the future application. Where units cannot have private amenity space, the applicant must ensure that the equivalent balance of space is included internally within affected units.
- GLA officers recommend the provision of ground floor private amenity space fronting the park as this would ensure these units are provided with a clearly defined private set back/ defensible space, with a clear sense of ownership, which would provide a more appropriate design approach in terms of natural surveillance, safety and security, in line with London Plan Policies 7.3 and 7.5 and Policies D1 and D7 of the draft London Plan. Boundary landscaping could also be provided to ensure adequate privacy is provided for residents and to integrate this interface with the park.
- As discussed during the meeting, west facing ground floor units within Blocks F which face the residential courtyard should be redesigned to ensure they are served by front doors and private amenity space, incorporating a defensible landscaped boundary to ensure privacy. Currently, these units are accessed via an internal corridor which also provides access to the refuse and cycle storage facilities; however, this arrangement would not provide an acceptable level of residential quality. Furthermore, GLA officers consider that front doors and private amenity space would help to generate additional activity and natural surveillance within the courtyard, which will be important given the applicant's proposals for an open courtyard design and the intention for this space to function as an alternative public route through to the park.
- The proposed ratio of residential units per core, per floor exceeds the recommended benchmark (8 per floor) set out in the 2016 Housing SPG in a number of instances. Whilst the taller elements of the scheme range between 9, 8 and 6 units per floor per core, which is acceptable, between 12 and 14 units per core per floor are proposed on levels 02 to 05 within Blocks C, D and E. As discussed during the meeting, the applicant should consider providing additional cores within these blocks, which are intended for private sale, rather than Build to Rent. Where the Housing SPG benchmark, this would need to be mitigated and justified based on higher levels of professional on-site management being secured.

Residential density and design review

The applicant has stated that the proposed scheme would have a density of 431 residential units per hectare and 843 habitable rooms per hectare based on the net developable area. Policy D2 of the draft London Plan states that development proposals which either exceed the prescribed dwelling per hectare density thresholds or are more than 30m in height should be subject to additional design scrutiny and review. Whilst an independent design review has not been undertaken, the applicant has undertaken an iterative process of design review with the GLA and Ealing Council officers, which has resulted in substantial revisions to the scheme over a two year period. Subject to addressing concerns set out above in respect of residential quality, GLA officers are supportive of the proposed design and layout of the scheme and consider this to have been sufficiently scrutinised at pre-application stage.

Inclusive design

The applicant has stated that at least 10% of new build dwellings would meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users); and all other new build dwellings must meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings', which is supported, in accordance with Policy 3.8 of the London Plan and Policy D5 of the draft London Plan. The submitted documents also demonstrate that these units would be distributed across the Build to Rent and market sale units and at different levels of the scheme, which would provide an appropriate choice. This is supported. Wheelchair user dwellings in Blocks E and F would appear to be a significant distance from the basement disabled parking spaces, which requires further consideration. The range of accessibility improvements to the existing leisure facility are strongly supported; however, further information should be provided to demonstrate that the proposed shared surface would be clearly delineated for all potential users, including disabled people.

Energy and climate change

A separate technical note provided by the GLA Energy team and has been provided to the applicant as an appendix alongside this pre-application advice note.

Flood risk & sustainable urban drainage

- The site is within Flood Zone 3 so the application will need to be supported by a Flood Risk Assessment (FRA) and the proposed scheme should ensure that flood risk is minimised and mitigated, and that residual risk is addressed. The development should aim to achieve greenfield runoff rates by maximising the use of above ground Sustainable Urban Drainage Systems (SuDS) in line with London Plan Policy 5.13 and Policy SI12 of the draft London Plan. Evidence will need to be provided of how this is achieved for a variety of return periods up to and including the 1 in 100-year event, with an allowance for climate change (40%). If a greenfield run-off rate is unachievable, the applicant will need to appropriately demonstrate why this is not possible and demonstrate that the use of above ground sustainable drainage systems (SuDS) has been maximised, in line with the London Plan drainage hierarchy.
- The pre-application materials indicate that a comprehensive approach to manage drainage across the site is being followed, which includes a variety of above ground SuDs measures, which is welcomed. The landscape features should be designed to appropriately manage the surface water from the buildings, incorporating SuDS measures. The hardstanding areas within the public realm should either be constructed using either permeable surfacing or should be designed to drain towards planted SuDS elements. Any flat roofs should also be designed to incorporate green/blue

roofs and rainwater harvesting to manage rainwater close to source, in accordance with the drainage hierarchy.

Transport

Walking, Cycling and Healthy Streets

The proposals would create and enhance walking paths through the site, including a new bridge across the River Brent to the northwest of the site, which is supported in line with the Healthy Streets principles set out in Policy T2 of the draft London Plan and the Mayor's Transport Strategy. Further information to confirm cyclist access through the park should also be provided. Wayfinding measures, preferably using Legible London should be provided.

Car Parking

- A total of 169 residential car parking spaces are proposed, which equates to a parking ratio of 0.27 spaces per unit. This accords with the current and draft London Plan and is supported. Residential disabled car parking provision would also comply with the draft London Plan requirement for 3% of the total number of residential units to be provided with disabled parking spaces from the outset, which is welcomed and the applicant has stated that the additional 7% could be met by amending conventional spaces within the basement. This is supported and complies with Policy T6.1 of the draft London Plan. All residential car parking should provide infrastructure for electric vehicles, with 20% active provision and 80% passive provision provided.
- A total of 175 car parking spaces and 3 coach parking bays are proposed for the Leisure Centre use, for which full justification should be provided, taking into account the Mayor's draft London Plan and Transport Strategy and objectives in relation to modal shift. This should be based on car parking usage surveys of the current site and a range of similar sites. A Parking Design and Management Plan should be submitted which should apply to all types of car parking on site.

Cycle Parking

The proposed cycle parking provision appears to comply with the minimum standards in the draft London Plan and would be located in secure and covered locations. Cycle parking should be designed in accordance with the London Cycle Design Standards (LCDS), which requires at least 5% of spaces to accommodate larger and adapted cycles. This is an accessibility requirement. The proposed two-tier racks should include a mechanically or pneumatically assisted system for accessing the upper levels and allow for double locking. Short-stay cycle parking is proposed within a sheltered external cycle store. This should be located close to building entrances in order to conform with draft London Plan policy T5.

Bus Services

Local junction modelling taking account of additional vehicle traffic generated is included within the Transport Assessment and the impact of this on bus services will be assessed when the formal application is submitted. Dependent on the extent of this impact, further financial contributions may be sought to mitigate this as appropriate.

Deliveries, servicing and construction

It is understood that Delivery and Servicing is proposed to take place off-street within the site boundary, which is welcomed, in line with draft London Plan policy T2 and T7. The servicing arrangement should not impact existing bus movements, nor impede vehicle and pedestrian movement on Ruislip Road East and this must be demonstrated in the application submission as well as followed up in more detail in the Delivery and Servicing Management Plan (DSP). Comments are provided under urban design in relation to deliveries and servicing. The application should be supported by an outline Construction Logistics Plan, produced in accordance with TfL best practice guidance.

Conclusion

- As set out above, very special circumstances must exist which would outweigh the proposed harm to openness and any other harm caused. The proposal for significantly enhanced replacement indoor and outdoor leisure and sporting facilities and play space is strongly supported. In line with the GLA's initial pre-application advice, the applicant has minimised the harm to the MOL by restricting the proposed enabling residential development to the previously developed parts of the site and avoiding the encroachment of buildings onto the 'greenfield' areas of parkland. A comprehensive scheme of enhancements to the quality, use and enjoyment of the MOL is also proposed, which is welcomed.
- Notwithstanding this, GLA officers consider that the applicant's a zero percent affordable housing offer undermines the wider package of public benefits associated with the scheme and the case for very special circumstances. This will need to be robustly demonstrated within the applicant's financial viability assessment, which will be subject to early assessment by the GLA's in-house viability team to verify that the proposed scheme delivers the maximum viable level of affordable housing, without grant. GLA officers do, however, recognise that there are substantial costs associated with the replacement leisure facilities and, given the site's MOL designation, the quantum of enabling residential development is restricted in this instance to the previously developed parts of the site. With this in mind, the proposal to deliver on-site affordable housing via grant funding is strongly supported and the applicant is urged to progress these discussions alongside the application so this element of the proposal can be confirmed ahead of the determination of any future planning application and with this grant scenario secured by Section 106.
- The applicant must also respond to the issues raised in this report with respect to urban design, inclusive access, transport, climate change and playing pitch provision. Improvements are required in terms of residential quality to respond to a potential shortfall of private amenity space in some areas and to maximise ground floor front doors in public areas. Refinements to the internal layout should also be considered to provide additional residential cores, as well as greater articulation to the massing of the sideways facing Blocks C and D.

for further information, contact GLA Planning Unit:

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Team Leader – Development Management

london.gov.uk

Principal Strategic Planner (Case Officer)

@london.gov.uk

Paul Robinson

From: 20 April 2018 15:31

To: Bob McCurry'; Cc: ealing.gov.uk';

Subject: RE: GLA/4287 Gurnell leisure centre - GLA pre-application advice

Dear all

Thanks again for providing the 'April 2018 Massing Options' pack in response to our meeting of 27 March. I presented the pack to Jules Pipe yesterday. He advised that he supported the 'L' block courtyard configuration - expressing the view that this approach was most effective in terms of anchoring the proposed enabling housing on previously developed land, and providing a well-defined street frontage. He also noted that the proposed approach to massing would provide a sympathetic response to neighbouring residential development at Peal Gardens.

Notwithstanding this, the Deputy Mayor is keen that we progress work with you on the viability side, and explore all options to reduce the quantum of enabling development – in order to minimise the impact on MOL openness.

Kind regards

Dear

Principal Strategic Planner Development Management Development, Enterprise & Environment GREATER LONDON AUTHORITY 4th Floor, City Hall, The Queen's Walk, London SE1 2AA Tel: 020 7983 Fax: 020 7983 Email: Iondon.gov.uk
From: [mailto: bartonwillmore.co.uk] Sent: 09 April 2018 17:31
To:
Subject: GLA/4287 Gurnell leisure centre - GLA pre-application advice Sent on behalf of

I write in relation to the proposal at Gurnell Leisure centre in LB Ealing and further to your pre-application letter dated 23rd March 2018 and our subsequent meeting at your office on the 27th March 2018.

Within your letter and during our discussions, it has been made clear to us that the principle of redeveloping Gurnell Leisure Centre via adjacent residential enabling development is considered acceptable. We understand from our discussions that the proposed location of the new leisure centre (turned to sit parallel with Ruislip Road East) is also acceptable, along with the tenure mix and quantum of development which is required to enable the delivery of a new Leisure Centre.

However, we understand the GLA have some concerns about the level of encroachment into the MOL in relation to the residential element to the east of the leisure centre, predominantly located on the existing surface level car park (previously developed land). In particular, paragraph 42 of your pre-app letter states the following in relation to the residential element:

"42 The applicant must investigate options for removing the westernmost block, and providing all remaining blocks with a consistent building line and frontage on to Ruislip Road East (thereby minimising any northern encroachment into greenfield MOL). As a potential means of achieving this the applicant is strongly encouraged to explore courtyard/open courtyard block typologies (for example an 'E' block layout). The applicant should also provide a

working figure for proposed hardstanding (in addition to built footprint), so that the proposed area of developed land may be compared to the existing situation. GLA officers would welcome the opportunity for further joint workshops with the applicant team and local planning authority to progress this work accordingly."

We held a meeting / workshop on the 27th March where we agreed on certain key principles and discussed various design options on the previously developed land with limited intrusion into the 'greenfield' MOL. We agreed that the location of the proposed leisure centre is acceptable and that residential development should not protrude any further north of the proposed leisure centre, thereby creating a line of limited encroachment stretching from the northeast corner of the proposed leisure centre to the northern most point of the existing Peal Gardens development to the east of the site. We also discussed that the need to ensure the agreed quantum of development is situated on the previously development land means that some flexibility around other housing standards (such as units per core and north facing) can be applied as a trade off against the overriding MOL policy objectives.

It was agreed within the workshop that we would further consider a 'courtyard' option and a 'finger' option, with the latter designed as 3 fingers on the south adjacent to the road and 2 fingers on the northern side. We have undertaken further options work and I am pleased to attach a short document prepared by 3D Reid Architects which sets out the agreed parameters, the previously presented scheme and our preferred approach for these two options.

Having carried out this work and considered the GLA pre-app comments, Be Living are now firmly of the view that the courtyard option is their preferred approach, which provides the minimum encroachment whilst delivering the quantum of development required to support the delivery of the new leisure provision. This proposal keeps the built form in line with the northern boundary of the existing car park, it addresses the street better and helps to create a more defined residential development.

As discussed in our meeting on the 23rd March, I understand that you need a week's lead-in to present this further work to the Deputy Mayor. We are therefore hoping that the provision of the attached document today will enable you to present this to the Deputy Mayor on Tuesday 17th April and, if helpful, we would be more than happy to come to your office and informally sit down with you to talk through the options work and the preferred proposal.

Finally, we understand that these proposals have been previously presented to the Deputy Mayor, Jules Pipe, and this latest option study will also be presented to the Deputy Mayor. Are you able to confirm whether the application submission and formal Stage 1 and 2 referrals will also be presented to Jules Pipe, in the interest of consistency, or will the final decision (at Stage 2, for example) by with the Mayor himself? If there is a shift in who reviews the proposals at various stages then this could obviously present a risk and we're keen to understand the situation as best as possible.

I hope the above and attached is helpful and meets your requirements. Please note that I am on leave between the 9th and 13th April so, if you need to discuss this on the phone or want an informal chat early, please feel free to contact (Planning Manager at Be Living - or my Associate, (0207 44 66 821).

Regards,

Director



W: www.bartonwillmore.co.uk 7 Soho Square, London, W1D 3QB



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From: < london.gov.uk>

Sent: 23 March 2018 17:09

Part B correspondence To: Tudor Jones < bartonwillmore.co.uk>; Bob McCurry < bartonwillmore.co.uk>; be.co.uk>; <u>ealing.gov.uk</u>> london.gov.uk> Cc: Subject: GLA/4287 Gurnell leisure centre - GLA pre-application advice Dear all Please find attached our pre-app advice report. We look forward to catching up at the design session next week. Kind regards | Principal Strategic Planner | Development Management | Development, Enterprise & Environment GREATER LONDON AUTHORITY | 4th Floor, City Hall, The Queen's Walk, London SE1 2AA Tel: 020 7983 | Fax: 020 7983 | Email: london.gov.uk If you're not on the electoral register, you won't be able to vote in local authority elections this May. You must have registered to have your say. Find out more at https://www.yourvotematters.co.uk/ #LondonIsOpen

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Paul Robinson

From: be.co.uk>

Sent: 17 April 2018 11:08

To:

Subject: RE: GLA/4287 Gurnell leisure centre - GLA pre-application advice

Thank you for the update

- Planning & Development Manager
/ internal extn

From: [mailto: london.gov.uk]

Sent: 16 April 2018 09:45

To:

Subject: RE: GLA/4287 Gurnell leisure centre - GLA pre-application advice

Hi

Yes, thanks. This is a very helpful piece of work.

As it happens the Jules briefing this week is now likely to be on Thursday (rather than tomorrow), but I'll provide the feedback as soon as I possibly can.

Kind regards

| Principal Strategic Planner | Development Management | Development, Enterprise &

Environment

GREATER LONDON AUTHORITY | 4th Floor, City Hall, The Queen's Walk, London SE1 2AA

Tel: 020 7983 | Fax: 020 7983 | Email:

From: [mailto: be.co.uk]

Sent: 13 April 2018 15:42

To: | Iondon.gov.uk>

Subject: FW: GLA/4287 Gurnell leisure centre - GLA pre-application advice

Hi

I hope you are well.

I just wanted to check that the pack as below and attached is everything you need to speak with Jules Pipe? Will you be able to place the project on the agenda for Tuesday? I am happ to discuss any element of the project.

Thank you and have a good weekend

- Planning & Development Manager
/ internal extn

From: <u>bartonwillmore.co.uk</u>]

Sent: 09 April 2018 17:31

To:		london.gov.ul	<u>k</u>	
Cc:			ealing.gov.uk;	london.gov.uk
Sub	ject: GLA/42	87 Gurnell leisure ce	entre - GLA pre-application advice	

Sent on behalf of

Dear

I write in relation to the proposal at Gurnell Leisure centre in LB Ealing and further to your pre-application letter dated 23rd March 2018 and our subsequent meeting at your office on the 27th March 2018.

Within your letter and during our discussions, it has been made clear to us that the principle of redeveloping Gurnell Leisure Centre via adjacent residential enabling development is considered acceptable. We understand from our discussions that the proposed location of the new leisure centre (turned to sit parallel with Ruislip Road East) is also acceptable, along with the tenure mix and quantum of development which is required to enable the delivery of a new Leisure Centre.

However, we understand the GLA have some concerns about the level of encroachment into the MOL in relation to the residential element to the east of the leisure centre, predominantly located on the existing surface level car park (previously developed land). In particular, paragraph 42 of your pre-app letter states the following in relation to the residential element:

"42 The applicant must investigate options for removing the westernmost block, and providing all remaining blocks with a consistent building line and frontage on to Ruislip Road East (thereby minimising any northern encroachment into greenfield MOL). As a potential means of achieving this the applicant is strongly encouraged to explore courtyard/open courtyard block typologies (for example an 'E' block layout). The applicant should also provide a working figure for proposed hardstanding (in addition to built footprint), so that the proposed area of developed land may be compared to the existing situation. GLA officers would welcome the opportunity for further joint workshops with the applicant team and local planning authority to progress this work accordingly."

We held a meeting / workshop on the 27th March where we agreed on certain key principles and discussed various design options on the previously developed land with limited intrusion into the 'greenfield' MOL. We agreed that the location of the proposed leisure centre is acceptable and that residential development should not protrude any further north of the proposed leisure centre, thereby creating a line of limited encroachment stretching from the northeast corner of the proposed leisure centre to the northern most point of the existing Peal Gardens development to the east of the site. We also discussed that the need to ensure the agreed quantum of development is situated on the previously development land means that some flexibility around other housing standards (such as units per core and north facing) can be applied as a trade off against the overriding MOL policy objectives.

It was agreed within the workshop that we would further consider a 'courtyard' option and a 'finger' option, with the latter designed as 3 fingers on the south adjacent to the road and 2 fingers on the northern side. We have undertaken further options work and I am pleased to attach a short document prepared by 3D Reid Architects which sets out the agreed parameters, the previously presented scheme and our preferred approach for these two options.

Having carried out this work and considered the GLA pre-app comments, Be Living are now firmly of the view that the courtyard option is their preferred approach, which provides the minimum encroachment whilst delivering the quantum of development required to support the delivery of the new leisure provision. This proposal keeps the built form in line with the northern boundary of the existing car park, it addresses the street better and helps to create a more defined residential development.

As discussed in our meeting on the 23rd March, I understand that you need a week's lead-in to present this further work to the Deputy Mayor. We are therefore hoping that the provision of the attached document today will enable you to present this to the Deputy Mayor on Tuesday 17th April and, if helpful, we would be more than happy to come to your office and informally sit down with you to talk through the options work and the preferred proposal.

Finally, we understand that these proposals have been previously presented to the Deputy Mayor, Jules Pipe, and this latest option study will also be presented to the Deputy Mayor. Are you able to confirm whether the application submission and formal Stage 1 and 2 referrals will also be presented to Jules Pipe, in the interest of consistency, or will the final decision (at Stage 2, for example) by with the Mayor himself? If there is a shift in who reviews the proposals at various stages then this could obviously present a risk and we're keen to understand the situation as best as possible.

Part B correspondence
I hope the above and attached is helpful and meets your requirements. Please note that I am on leave between the 9 th and 13 th April so, if you need to discuss this on the phone or want an informal chat early, please feel free to contact (Planning Manager at Be Living - or my Associate, Planning Manager at Be Living - or my Associate - or m
Regards,
Director
W:www.bartonwillmore.co.uk 7 Soho Square, London, W1D 3QB Consider the environment. Do you really need to print this email?
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From:
Dear all
Please find attached our pre-app advice report. We look forward to catching up at the design session next week.
Kind regards
Principal Strategic Planner Development Management Development, Enterprise & Environment GREATER LONDON AUTHORITY 4th Floor, City Hall, The Queen's Walk, London SE1 2AA Tel: 020 7983 Fax: 020 7983 Email: Iondon.gov.uk
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Paul Robinson

From: Sent: 26 March 2018 10:34 To: Cc: RE: GLA/4287 Gurnell leisure centre - GLA pre-application advice Subject: Thanks On our side will be myself, and Kind regards | Principal Strategic Planner | Development Management | Development, Enterprise & Environment GREATER LONDON AUTHORITY | 4th Floor, City Hall, The Queen's Walk, London SE1 2AA Tel: 020 7983 | Fax: 020 7983 | Email: london.gov.uk [mailto: be.co.uk] From: Sent: 26 March 2018 10:24 To: london.gov.uk> Subject: RE: GLA/4287 Gurnell leisure centre - GLA pre-application advice Thank you for this. Plenty to discuss tomorrow. I can confirm attendees from our side will be: Myself; • , Be; , Be; LBE; , LBE; , LBE; , 3DR, 3DR, 3DR; , Barton Willmore. Thank you - Planning & Development Manager / internal extn [mailto: london.gov.uk] Sent: 23 March 2018 17:09 To: 'Tudor Jones'; 'Bob McCurry';

1

Dear all

Subject: GLA/4287 Gurnell leisure centre - GLA pre-application advice

Please find attached our pre-app advice report. We look forward to catching up at the design session next week.

Kind regards

Principal Strategic Planner Development Management Development, Enterprise &
nvironment
REATER LONDON AUTHORITY 4th Floor, City Hall, The Queen's Walk, London SE1 2AA
el: 020 7983 Fax: 020 7983 Email: <u>london.gov.uk</u>

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GREATERLONDON AUTHORITY

Development, Enterprise and Environment

Director Barton Willmore 7 Soho Square London W1D 3QB Our ref: GLA/4287/GC/03 Date: 23 March 2018

Dear

Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999 & 2007; Town & Country Planning (Mayor of London) Order 2008 Gurnell Leisure Centre, Ruislip Road East London Borough of Ealing Our reference: GLA/4287

Further to the pre-planning application meeting held on 22 November 2017, and a subsequent design meeting on 14 December 2017, I enclose a copy of the GLA's assessment which sets out our advice and matters which will need to be fully addressed before the application is submitted to the local planning authority.

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

Yours sincerely



cc TfL

Part B correspondence GREATER LONDON AUTHORITY

pre-application report GLA/4287/01 23 March 2018

Gurnell Leisure Centre, Ruislip Road East

in the London Borough of Ealing

The proposal

Redevelopment to provide a new leisure centre, 556 residential units and open space improvements.

The applicant

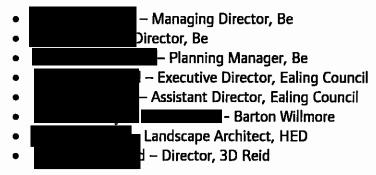
The applicant is **Be** and **Ealing Council**, and the architect is **3D REID**.

Context

On 20 October 2017 the GLA received a request pre-planning application meeting to discuss a proposal to develop the above site for the above uses. On 22 November 2017 a pre-planning application meeting was held at City Hall with the following attendees:

GLA group

- Principal Strategic Planner, GLA (case officer)
 Senior Strategic Planner/Urban Design, GLA
 Senior Area Manager (Housing and Land), GLA
 Principal Planner, TfL
 - Applicant team



Local Planning Authority

- Planning Officer, Ealing Council (case officer)
 Principal Planning Officer, Ealing Council
- 2 Following the initial meeting on 22 November 2017, a follow up design workshop with the applicant team and Ealing Council was held at 3D REID's office on 14 December 2017. Further to this, revised design material was provided to the GLA on 22 December 2017.
- The advice given by GLA officers does not constitute a formal response or decision by the Mayor with regard to future planning applications. Any views or opinions expressed are without prejudice to the Mayor's formal consideration of an application. Please note that the advice you receive is dependent upon the quality of the information and documentation that you provide.

Site description

- Gurnell Leisure Centre is located within Brent River Park, at the edge of a swathe of Metropolitan Open Land forming part of the River Brent floodplain. The 6.6 hectare site is bound by the River Brent to the north and west, Ruislip Road East to the south, and Argyle Road and Peal Gardens (a residential cul-de-sac) to the east. The site is largely greenfield, and includes the leisure centre building and associated hardstanding and surface car parking; BMX track; skatepark; adventure playground; and, two grass sports pitches. The surrounding context is suburban and pronominally low-rise (two to four-storeys), however, there are a number of taller buildings (up to 11-storeys) south of Ruislip Road East, at Gurnell Grove.
- This part of the Brent Valley is a key focus for the Borough's strategic sporting facilities, which (including the existing 50 metre swimming pool at Gurnell and nearby Perivale Athletics Track) collectively perform a function which is of considerable significance within the west London sub-region. As a reflection of this, Gurnell is one of only four locations in London which provide a 50 metre swimming pool, and is currently home to the largest swimming club in the capital. Moreover, it is understood that the number of visits to the leisure centre has increased by 30% in 7 years (from 531,201 in 2009 to 692,906 in 2016). Nevertheless, originally completed in 1981, the leisure centre building is now at a point in its lifespan where it requires comprehensive repair and refurbishment. It also falls considerably short of contemporary approaches to inclusive design and disabled access.
- The site is located on Ruislip Road East, close to its junction with Argyle Road. Ruislip Road East carries five bus services with a combined frequency of 27 buses per hour during peak periods. In addition, Argyle Road (to the east) has one bus service at six buses per hour. Perivale London Underground Station (Central Line) is 1.8 kilometres to the north of the site and Castle Bar Park station (two trains per hour to Paddington and future Elizabeth Line interchange at West Ealing) is approximately 1 kilometre to the south. Overall the site registers a public transport access level (PTAL) of three, on a scale of zero to six where six denotes the most accessible locations in the capital.

Case history

7 There is no strategic planning case history at this site.

Details of the proposal

Redevelopment to provide a new leisure centre (including a 10 lane 50 metre swimming pool; a leisure pool for families and small children; gym; studio space; soft play; and cafe), 556 residential units (as a mix of for sale and build to rent) and open space improvements (including biodiversity enhancements; outdoor gym equipment; reporvided adventure playground, BMX track and skatepark; and, a pedestrian/cycle footbridge over the River Brent).

Strategic planning issues and relevant policies and guidance

- For the purposes of Section 38(6) of the Planning and Compulsory Purchase Act 2004, the development plan in force for the area is the 2012 Ealing Development DPD; 2013 Ealing Development Sites DPD; 2013 Ealing Development Management DPD; and, the 2016 London Plan (Consolidated with Alterations since 2011).
- 10 The following are relevant material considerations:

National Planning Policy Framework;

Draft replacement National Planning Policy Framework;

National Planning Practice Guidance;

Draft London Plan (consultation draft December 2017);

Metropolitan Open Land London Plan;
 Sports facilities London Plan;

Housing London Plan; Housing SPG; draft Affordable Housing and

Viability SPG; Housing Strategy; Shaping Neighbourhoods:

Play and Informal Recreation SPG; Shaping Neighbourhoods: Character and Context SPG;

• Affordable housing London Plan; Housing SPG; draft Affordable Housing and

Viability SPG; Housing Strategy;

• Urban design London Plan; Shaping Neighbourhoods: Character and

Context SPG; Housing SPG; Shaping Neighbourhoods: Play

and Informal Recreation SPG;

• Inclusive access London Plan; Accessible London: achieving an inclusive

environment SPG;

Sustainable development London Plan; Sustainable Design and Construction SPG;

Mayor's Climate Change Adaptation Strategy; Mayor's Climate Change Mitigation and Energy Strategy; Mayor's

Water Strategy; Mayor's Ambient Noise Strategy;

Transport and parking London Plan; the Mayor's Transport Strategy;

• Crossrail London Plan; and, Mayoral Community Infrastructure Levy.

Summary of meeting discussion

Following a presentation of the proposed scheme from the applicant team, meeting discussions covered strategic issues with respect to: principle of development; Metropolitan Open Land; sports facilities; housing; urban design; inclusive access; sustainable development; and, transport. GLA officer advice in respect of these issues is set out within the sections that follow.

Principle of development

- The site lies wholly within land designated as Metropolitan Open Land. London Plan Policy 7.17 and Policy G3 of the draft London Plan strongly resist the inappropriate development of Metropolitan Open Land which is afforded the same protection as Green Belt. Accordingly, Chapter 9 of the National Planning Policy Framework (NPPF) and Chapter 13 of the draft replacement NPPF is relevant in this case.
- The NPPF and its draft replacement make clear that development within Green Belt is inappropriate, save for a number of limited exceptions. Noting that this site has been previously developed, GLA officers have considered whether the NPPF exception for brownfield land in Green Belt might apply. However, having regard to the proposed nature and quantum of development, and the illustrative material provided, GLA officers have concluded that the proposed development would have a greater impact on openness. Therefore, the NPPF brownfield land exception test would not be met.
- Pursuant to the abovementioned policy and guidance, for the proposed development to overcome a presumption of refusal as inappropriate development, very special circumstances must

exist which would outweigh the proposed harm to openness, and any other harm. The potential case for very special circumstances is considered within the Metropolitan Open Land section below.

Metropolitan Open Land

- The applicant's case for very special circumstances is centred around the need for a new leisure centre, and a requirement for this to be financially enabled through cross-subsidy from residential development on MOL (as discussed in paragraph 26 below, it is understood that there is a £25.2 million shortfall in the funding necessary to deliver the new leisure centre). Having regard to consideration in the sports facilities section below, GLA officers accept that there is a need for a new leisure centre. It is also acknowledged that Ealing's Core Strategy strongly promotes such provision in this general location due to the characteristics of the Brent Valley catchment area (including the proximity of other sports facilities of local and sub-regional significance). However, in line with London Plan Policy 7.17 and Policy G3 of the draft London Plan it must be demonstrated that:
 - (i) there aren't any suitable alternative sites that would be preferential in planning policy terms;
 - (ii) any associated inappropriate development on MOL is the absolute minimum necessary to financially enable the new leisure centre;
 - (iii) the impact on MOL openness would be minimised as far as possible through a robust and well-considered design approach; and,
 - (iv) the scheme would not result in any unacceptable deficiency in local open space, and would deliver significant enhancement to the quality, use and enjoyment of MOL.
- For the proposal to be acceptable in strategic planning terms, points (i) to (iv), and any other relevant considerations, must individually or cumulatively amount to very special circumstances that would outweigh the harm to MOL proposed as a result of inappropriate development. The above points above are considered in further detail below.

Assessment of alternative sites

It is understood that an alternative site selection process has been undertaken. Whilst the scope of this has been developed with Council planning officers, at the time of the meeting the assessment report had not been finalised. GLA officers would welcome the opportunity to review and comment on the assessment in due course, and will expect the report to examine disaggregated scenarios – where the enabling development would be dispersed, and delivered across a range different sites.

Minimising inappropriate development and verifying 'enabling development' status

GLA officers expect the applicant to explore all potential avenues for third party funding (such as Sport England strategic grant) to help bridge the current £25.2 million shortfall, and significantly reduce the quantum of enabling development on MOL. Evidence of associated grant funding enquiries must be provided to the GLA accordingly. When all potential avenues for third party funding have been exhausted, GLA officers will require the applicant to submit a full viability assessment. This must be subject to rigorous independent review – in order to verify that any residual enabling development is the absolute minimum necessary to financially cross-subsidise delivery of the new leisure centre. As part of this process the applicant will be required to look at where it could make cost savings within the scheme in order to improve financial efficiencies and reduce the quantum of development necessary to achieve the required cross subsidy. This must

include viability modelling of the scheme on a 'for sale' basis, as well as the examination of options to reduce/remove potentially expensive multi-storey car parking provision. Such an approach would also respond to comments in the transport section below, which seek an overall reduction in car parking provision within the scheme generally. Moreover, given the circumstances in this case, GLA officers are willing to accept an off-site provision of affordable housing where this would result in a reduced quantum of development on MOL (refer to the housing section below).

Minimising impact through a robust design approach

Specific comments in this regard are set out within the urban design section below, and further work and revisions are required to respond to concerns of encroachment into 'greenfield' MOL. In general, GLA officers seek a reduced quantum of development overall in line with point (ii) and paragraph 18 above; as well as a design approach that would focus any new development on the previously developed part of the site (adjacent to Ruislip Road East).

Proposals for MOL enhancement

Having regard to Ealing Council's assessment of need for local open space and multifunctional green infrastructure, it must be demonstrated that the proposal would not result in any unacceptable deficiency. Furthermore, GLA officers expect a wider public benefits package that must include enhanced sporting, landscaping, accessibility and biodiversity improvements to Brent River Park. In particular, the applicant is strongly encouraged to firm up proposals for a new pedestrian/cycle bridge over the River Brent – in order to improve east-west connectivity through this area of MOL within the Brent Valley, as well as access northwards towards South Greenford Station and Perivale Athletics Track.

Metropolitan Open Land - conclusion

The proposed development on MOL is inappropriate, and harmful by definition. To be acceptable in planning terms very special circumstances must exist that would outweigh the harm to MOL openness. To support any such very special circumstances case, the applicant must demonstrate that: there aren't any suitable alternative sites; any inappropriate development is the absolute minimum necessary to financially enable the new leisure centre; the impact on MOL openness would be minimised as far as possible through a robust and well-considered design approach; and, the scheme would not result in any unacceptable deficiency in local open space, and would deliver significant enhancement to the quality, use and enjoyment of MOL.

Sports facilities

- London Plan Policy 3.19 and Policy S5 of the draft London Plan seek to increase participation in sport and physical activity and strongly support proposals that would increase or enhance sports and recreation facilities. Furthermore, these policies state that where such development is proposed on existing open space, it will need to be considered carefully in light of relevant open space policies as well as in the context of the borough's own assessment of needs and opportunities for both sports facilities and green multifunctional open space (refer to the Metropolitan Open Land section above).
- At the local level, the Ealing Core Strategy identifies the Brent Valley as a key focus for enhancing the Borough's strategic sports provision, whilst jointly protecting and enhancing MOL. Policy 5.2 of the Core Strategy promotes the sensitive management of the Brent River Park for public amenity, nature conservation and flood plain, but also acknowledges scope for more intensive outdoor recreation uses in the vicinity of Gurnell pool.

- As discussed in paragraph 5 above, Gurnell is currently one of only four locations in the capital which offer a 50 metre swimming pool, and therefore represents a sports facility of some considerable significance in west London sub-region.
- Originally completed in 1981, Gurnell is reported to be one of London's busiest leisure centres welcoming close to 700,000 visitors in 2016 (representing a visitor increase of 30% over the previous 7 years). However, the leisure centre building is now at a point in its lifespan where it requires comprehensive repair and refurbishment. It also falls considerably short of contemporary approaches to inclusive design and disabled access. Based on discussions at the meeting it is understood that Ealing Council has costed the works required adequately refurbish the leisure centre to current standards as equivalent to 80% of the cost of providing a new facility. Accordingly, in March 2015 Ealing Council Cabinet made the decision to demolish the existing centre and replace it with a new facility.
- The specification for the new facility would retain a 50 metre swimming pool, but with four additional lanes (10 in total). A movable floor (and booms) would also allow for the pool to be subdivided for different user groups. The new facility would also include a themed leisure pool (focused on families and young children); a large gym; twice the amount of existing studio space; a soft play area; and, cafe. It is understood that the cost of a new facility is estimated to be £37.7 million. Ealing Council has advised that it has a budget of £12.5 million, and therefore it would be necessary to bridge a £25.2 million funding gap.
- As part of a broader offer for sports and recreation the applicant is also investigating options to enhance the existing provision of outdoor sporting facilities within Brent River Park. Emerging proposals include a new playground; grass areas for informal ball games and outdoor activities; trim trail; and, distance marker routes. The existing BMX and skate park facilities within the MOL to the north-east of the leisure centre would also be re-provided, with consideration to be given to the enhancement of these facilities. Notwithstanding these potential enhancements, it is understood that it may be necessary to relocated a number of existing sports pitches from Brent River Park. The applicant will need to demonstrate that these would be appropriately reprovided within the general vicinity so as not to adversely affect overall pitch capacity in the area.
- Subject to the existence of very special circumstances (as discussed in paragraphs 15 to 21 above), the proposed provision of a new leisure centre and enhanced outdoor facilities for sports and recreation is strongly supported in strategic planning terms. The applicant must, nevertheless, demonstrate that any displaced sports pitches would be appropriately reprovided so as not to adversely affect overall pitch capacity in the area.

Housing

Whilst the proposed residential schedule is still to be finalised, the scheme is currently understood to comprise 556 residential units (as a mix of 'for sale' and 'build to rent' products). As discussed in the metropolitan open land section above, the proposed housing constitutes inappropriate development as defined by the NPPF, but is nevertheless proposed in order to financially enable delivery of the new leisure centre. Given the MOL designation, this site was not included within the London Strategic Housing Land Availability Assessment 2017. Therefore, if these units were to be delivered they would amount to a windfall of additional supply equivalent to 20% of the London Borough of Ealing's annual housing target within the draft London Plan.

Affordable housing and viability

- London Plan Policies 3.11 and 3.12 and draft London Plan Policy H5 seek to maximise 30 the delivery of affordable housing, with the Mayor setting a strategic target of 50%. Policy H6 of the draft London Plan identifies a minimum threshold of 50% affordable housing (by habitable room) for public land. Applications that meet or exceed the relevant threshold level of affordable housing without public subsidy, providing an appropriate tenure split, and which meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor can follow the 'Fast Track Route' set out in the draft London Plan and the Affordable Housing & Viability SPG. This means that they are not required to submit a viability assessment or be subject to a late stage viability review. However, in this case, even if the development were eligible for the Fast Track Route, a viability report will still be required in order to address the principle issue of inappropriate development on MOL, and verifying 'enabling development' status. Moreover, whilst GLA officers are of the view that a significant affordable housing offer would positively contribute as part of a wider package of public benefits to support very special circumstances, officers are willing to accept an off-site provision of affordable housing in this instance - where this would result in a reduced quantum of development on MOL.
- Based on discussions at the meeting it is understood that the financial design of the scheme is intended to generate a sufficient surplus to bridge the leisure centre funding gap, but with no additional cross-subsidy remaining to deliver affordable housing. This approach acts to help minimise the quantum of development on MOL, but effectively means that affordable housing policy requirements would need to be addressed through alternate funding sources. To this end Ealing Council has advised that it seeks to invest £10 million of own affordable housing funds into the scheme, in order to deliver a provision of discount market rent affordable housing. Initial discussions indicate that this could achieve an overall on-site provision of 20% affordable housing.
- Policy H13 of the draft London Plan recognises that affordable housing provision within build to rent developments can be solely discount market rent (DMR) at a genuinely affordable rent, preferably London Living Rent levels, which must be secured in perpetuity. The draft London Plan seeks to secure 30% of the DMR at London Living Rent levels, with the remainder to be provided a range of discounts below market rent to be agreed with the borough and GLA.
- The applicant must confirm the affordability of the proposed DMR units to enable GLA officers to appropriately assess the affordable housing offer in accordance with the Mayor's preferred affordable housing tenures, and the affordability criteria set out in Policy H7 of the draft London Plan, the Mayor's Affordable Housing and Viability SPG, and the London Plan Annual Monitoring Report. The draft London Plan is clear that for intermediate rented products to be considered affordable, the combined rent and service charge should be no greater than 40% of net household income and, as a minimum, units must be affordable to households on incomes below £60,000 a year.
- Further to the above, the application must be considered under the Viability Tested Route and GLA officers are keen to work with the applicant and the local planning authority to robustly interrogating the scheme's viability to ensure that the enabling status of the development is verified, and that the maximum amount of affordable housing is delivered. Early implementation and late stage review mechanisms will also need to be secured as part of any future Section 106 agreement in accordance with Policy H6 of the draft London Plan and the Mayor's Affordable Housing & Viability SPG.

Build to rent obligations

A covenant must be applied to the proposed build to rent units in accordance with Policy H13 of the draft London Plan, the Mayor's Affordable Housing and Viability SPG, and Policy 3.8 of the London Plan. The covenant must be for a minimum of 15 years and must be secured in the Section 106 agreement. The Section 106 must also secure the inclusion of a clawback mechanism (to recoup affordable housing contributions in the event of the covenant being broken and units being sold as open market sale). Other provisions set out in draft Policy H13 must also be secured, including unified ownership and management, length of tenancy and certainty over rent levels, must also be secured. Furthermore, and for the avoidance of doubt, all affordable housing must be secured in perpetuity via the Section 106 agreement.

Housing standards and children's play space

- With respect to housing standards, all units must be designed comply with London Plan / draft London Plan minimum space standards, as well as the requirement for wheelchair accessible/adaptable homes. GLA officers would ultimately expect standards M4(2) and M4(3) to be secured by planning condition.
- Policy 3.6 of the London Plan states that development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. Policy S4 of the draft London Plan states residential developments should incorporate good-quality, accessible play provision for all ages, of at least 10 sq.m. per child. Based on the characteristics of the site and the setting, GLA officers expect the scheme to comfortably meet the spatial requirements for children's play and informal recreation. The overall play strategy will nevertheless need to be worked up in detail as part of the planning submission, and set against the context of the wider open space enhancements proposed.

Urban design

- The key design objectives for this scheme are to: minimise inappropriate development on MOL; minimise impact on MOL openness; focus development on the previously developed part of the site; preserve a coherent expanse of green open space and support a rational and defaceable MOL boundary; and, provide an appropriate interface/relationship with neighbouring streets, spaces and neighbourhoods (including existing low-rise development at Peal Gardens).
- At this stage the scheme continues to undergo an iterative process of design review in order to establish the optimum pattern and layout of development in response to the key objectives outlined above. The quantum of on-site enabling development proposed currently adds to the challenge in this regard, and in line with the comments set out in the Metropolitan Open Land section of this report, the applicant must explore all possible means to reduce the quantum of in appropriate development.
- GLA officers are generally of the view that the proposal has been incrementally improving, and the proposed 45-degree rotation of the leisure centre block to align with Ruislip Road East is supported as a means of providing a strong street frontage; legible arrival space and front door for the leisure centre; and, rational delineation of open space to the rear. Moreover, the removal of an eastern wing on the leisure centre block (present on earlier iterations of the scheme, and resulting in northern encroachment into greenfield MOL) is strongly supported.
- Further to the above, attention at the previous design workshop in December 2017, focused on the arrangement of residential blocks to the east of the leisure centre, in the area of

the existing surface car park. It is noted the Ealing Council favours a linear block approach in this area – in order to allow for views through, between buildings, into Brent River Park. This approach has benefits in terms of maintaining a sense of openness from Ruislip Road East, however, GLA officers are concerned that the current arrangement (refer to figure 1 below) would result in excessive encroachment into 'greenfield' MOL. The westernmost block is of particular concern, given that: it is situated entirely outside the previously developed part of the site; and, extends beyond the northern extent of the existing surface car park and beyond the rear elevation of the proposed leisure centre block. Similar concern is raised with the second block to the east of this.



Figure 1: Existing built footprint and hardstanding, with proposed built footprint overlaid.

- The applicant must investigate options for removing the westernmost block, and providing all remaining blocks with a consistent building line and frontage on to Ruislip Road East (thereby minimising any northern encroachment into greenfield MOL). As a potential means of achieving this the applicant is strongly encouraged to explore courtyard/open courtyard block typologies (for example an 'E' block layout). The applicant should also provide a working figure for proposed hardstanding (in addition to built footprint), so that the proposed area of developed land may be compared to the existing situation. GLA officers would welcome the opportunity for further joint workshops with the applicant team and local planning authority to progress this work accordingly.
- In terms of scale and massing, based on the current quantum of development it is evident that the proposal would result in a significant step-change in scale compared to the immediate context. Nevertheless, GLA officers support the principle of generally containing the tallest buildings within the middle of the site, and stepping down towards the site edges at the interface with the existing context. Following consensus on scheme layout and block typology, GLA officers seek further engagement to refine and agree the approach to massing, as well as internal block layouts, and ground floor interface. Given the likely density of the blocks the applicant team is also encouraged to undertake an independent design review in response to Policy D6 of the draft London Plan.

Inclusive access

London Plan Policy 7.2 and Policy D3 of the draft London Plan seek to ensure that future development meets the highest standards of accessibility and inclusion, and require that design and access statements explain how the principles of inclusive design, including the specific needs of disabled people, have been addressed. This scheme represents an important opportunity to improve inclusive access to sporting facilities in the borough, and the leisure centre should be design having regard to relevant Sport England guidance. The design and

access statement should include typical residential unit layouts within the scheme - demonstrating that standards for wheelchair accessible/adaptable homes would be met. Moreover, in the interests of supporting housing choice for disabled people, GLA officers expect the 10% provision of wheelchair accessible/adaptable homes to be provided at both ground and upper levels within the scheme.

The design of the landscaping and public realm, including the entrances to buildings, will also be crucial to determining how inclusive this development will be to many people. The design and access statement should clarify how the design will respond to any significant level changes at the site, and how the scheme will improve access to MOL for disabled people. Any shared surface areas within the scheme must be demarcated by tactile paving, and should be flanked by pedestrian safe zones.

Sustainable development

Energy strategy

- In accordance with London Plan Policy 5.2 and Policy SI2 of the draft London Plan the applicant should provide an energy statement which complies with the principles of the London Plan energy hierarchy. Recently updated guidance on the format for the energy assessment is available on the GLA website here: www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0.
- The Mayor currently applies a target reduction of 35% against Part L of Building Regulations 2013 for the purposes of assessing carbon dioxide savings against London Plan Policy 5.2. However, as explained within the abovementioned energy assessment guidance, the carbon reduction target for new residential development changed on 1 October 2016 to 'zero carbon' (as defined in section 5.2 of the Housing SPG).
- 48 GLA officers would welcome the opportunity to provide comments on the draft energy strategy once it has been developed in more detail.

Climate change adaptation

London Plan policies 5.10 and 5.11 seek the incorporation of new green infrastructure as part of development proposals, and Policy 5.13 requires the use of sustainable urban drainage systems to reduce surface water runoff. The applicant confirmed that it is exploring options for rainwater attenuation through landscaping and potential green roofs. This is supported, and the future submission should include firm proposals for these measures. The applicant should also explore opportunities for ecological enhancement in line with London Plan Policy 7.19.

Transport

The proposals include the creation of new walking paths through the site, as well as a bridge across the River Brent to the northwest of the site. It is assumed that these would be available for cycling also. The Transport Assessment (TA) supporting a future application should supply details about the treatment of these routes and measures to ensure personal security of users. PERS and CLOS audits should be undertaken for all routes to key attractors including rail and underground stations, and appropriate and proportionate contributions may be sought for any improvements indicated. Wayfinding, preferably using Legible London elements, should be provided.

- The quantum of cycle parking spaces for long-stay and short-stay use should at least meet minimum draft London Plan standards. A good level of detail regarding the location, access arrangements and the form of stands proposed should be provided with the application. Since "stacking" racks are not suitable for non-standard bikes (for example tricycles, children's bikes, cargo bikes and cycle trailers) and are not accessible to those who do not possess considerable physical strength and dexterity, a good proportion of the long-term cycle parking spaces should be provided using accessible stands such as the "Sheffield" stand with appropriate spacing. All short stay provision should be of the Sheffield stand type. Cycle parking should be easily accessible from the road, and not involve access through long or narrow corridors, tight turns or steps, or the opening of multiple doors.
- At the meeting the suggestion of providing single-tier racks with potential to introduce a second tier if/when demand proves it is necessary. On reflection, in the light of the targets and increased requirements in the draft London Plan and the potential difficulty in securing an obligation to provide for this (and the necessary monitoring on both sides), TfL has advised that it would be more appropriate to make full provision from first occupation.
- The draft London Plan standards set out in Table 10.2 should be taken as the maxima for the residential element of this development (based on the site's existing PTAL of 3) with a general aspiration to reduce parking to encourage more active travel and, particularly in this case, to minimise the impact on congestion on the surrounding streets and wider road network. It is clear that the provision of car parking should not be used as a reason not to provide affordable housing, and so the full economics of the construction cost and potential financial gain from parking spaces should be transparent.
- In line with the draft London Plan, full justification will be required for the provision of leisure centre parking spaces, including for coaches. It should be based on surveys of a range of similar sites and of this site, the latter to be viewed in the light of a new Travel Plan for the leisure centre compared with any existing Travel Plan. As mentioned at the meeting, TRICS does not have many leisure centre sites, and so new surveys are likely to be required in which case pools in Hillingdon, Orpington and Lewisham as well as the existing Gurnell should be considered, and ideally the new surveys should be added to the TRICS database. The draft London Plan requires a Car Parking Design and Management Plan which should apply to all types of car parking on the site.
- It was suggested that a shuttle bus could be provided to nearby rail station(s). Instead, TfL would prefer that contributions are made to improve the provision of public bus services in the area, since:
 - not all movements will be to stations, and we would encourage local shopping, school and leisure trips to be made by bus;
 - a private shuttle bus does nothing to improve accessibility to the leisure centre for the public; and.
 - the level of such contributions cannot be determined until further trip generation, mode split (in the light of stretching Travel Plan targets), distribution and assignment are carried out as part of the Transport Assessment process.
- Local junction modelling taking account of additional vehicle traffic generated by the development will also indicate the impact on existing bus services and, depending on the extent of that impact, further financial contributions may be sought to mitigate that impact as appropriate.

- 57 If L will require a full transport assessment, supported by travel plans, delivery and servicing plans and construction traffic management plans all meeting current best practice, in support of a future planning application.
- The applicant has been offer a formal TfL pre-application meeting, through which more detailed transport issues can be identified and resolved prior to submission of a planning application. This would be particularly useful for discussions around contributions toward bus services and for walking, cycling and other transport infrastructure improvements. This will contribute to the delivery of a better quality and more sustainable development, as well as reducing delays during the planning process. If the applicant wishes to take up this opportunity, further information can be found at: https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-applications/pre-application-advice.

Conclusion

- Whilst the proposed provision of a new leisure centre and other open space enhancements is strongly supported, the scheme as a whole (including enabling residential development) constitutes in appropriate development on metropolitan open land. Accordingly, to be acceptable in planning terms, very special circumstances must exist which would outweigh the proposed harm to openness. To support any such very special circumstances case, the applicant must demonstrate that: there aren't any suitable alternative sites; any inappropriate development is the absolute minimum necessary to financially enable the new leisure centre; the impact on MOL openness would be minimised as far as possible through a robust and well-considered design approach; and, the scheme would not result in any unacceptable deficiency in local open space, and would deliver significant enhancement to the quality, use and enjoyment of MOL.
- The applicant must also respond to the issues raised in this report with respect to: sports facilities; housing; urban design; inclusive access; sustainable development; and, transport. In particular, follow up meetings are sought with respect to urban design and financial viability/affordable housing.

for further information contact GLA Planning Unit, Development & Projects Team:

Juliemma McLoughlin, Chief Planner

020 7983

Head of Development Management (acting)

@london.gov.uk

@london.gov.uk

Principal Strategic Planner (case officer)
s@london.gov.uk

Paul Robinson

From: <a href="mailto

Sent: 20 March 2018 09:30

To: Subject:

Gurnell Leisure Centre: Report

Importance: High



I hope you had a good (if cold!) weekend.

I was just wondering when we could expect to receive the GLC report? For obvious reasons, it would be helpful to receive it a few days ahead of our meeting on the 27th to provide us with time to consider our response.

Thank you

Planning & Development Manager
 / internal extn

From: [mailto: london.gov.uk]

Sent: 13 March 2018 12:19

To: Cc:

Subject: RE: Gurnell Leisure Centre: Design Meeting Date

Great. Ok, I'll make sure we get our largest pre-app room.

| Principal Strategic Planner | Development Management | Development, Enterprise &

Environment

GREATER LONDON AUTHORITY | 4th Floor, City Hall, The Queen's Walk, London SE1 2AA

Tel: 020 7983 | Fax: 020 7983 | Email:

From: [mailto:

Sent: 13 March 2018 12:18

To: | london.gov.uk>

Cc: | london.gov.uk>

Subject: RE: Gurnell Leisure Centre: Design Meeting Date

Great, thanks. We can confirm the date/time. I will confirm attendees shortly. We will probably need a room with space for 10/11 from our side, plus room for a model like the one we used at the last meeting.

be.co.uk]

Thank you

- Planning & Development Manager/ internal extn

From: [mailto: london.gov.uk]

Sent: 13 March 2018 11:58

To:

Cc:

Subject: RE: Gurnell Leisure Centre: Design Meeting Date

Yes, happy to host at City Hall.

| Principal Strategic Planner | Development Management | Development, Enterprise &

Environment

GREATER LONDON AUTHORITY | 4th Floor, City Hall, The Queen's Walk, London SE1 2AA

Tel: 020 7983 | Fax: 020 7983 | Email:

From: [mai

[mailto: be.co.uk]

Sent: 13 March 2018 08:48

To: | london.gov.uk>

Cc: | london.gov.uk>

Subject: RE: Gurnell Leisure Centre: Design Meeting Date

Thank you. I'll check with the team and get back to you asap.

In retrospect, could we actually hold it at City Hall?

Planning & Development Manager
 / internal extn

From: [mailto: london.gov.uk]

Sent: 12 March 2018 18:21

To:

Cc:

Subject: RE: Gurnell Leisure Centre: Design Meeting Date

Hi

and I could do 27 March from 14:30. Would that work?

| Principal Strategic Planner | Development Management | Development, Enterprise &

Environment

GREATER LONDON AUTHORITY | 4th Floor, City Hall, The Queen's Walk, London SE1 2AA

Tel: 020 7983 | Fax: 020 7983 | Email:

From: [mailto: be.co.uk]

Sent: 12 March 2018 17:29

To: < london.gov.uk>

Subject: Gurnell Leisure Centre: Design Meeting Date

Hi

Thank you for your call earlier today. I think it's fair to say that our team will arrange our diaries as appropriate in order to meet the GLA, so please can you suggest a date? Before Easter weekend would be fantastic, if possible. Would you be ok to come to 3D Reid's again, as well? I think it worked well last time having their facilities to hand.

Thank you

Paul Robinson

From: be.co.uk>

Sent: 12 March 2018 13:30 **To:**

Subject: Gurnell Leisure Centre

Hi

I hope you are well.

I was just wondering if you had an update on the progress of the advice note regarding the Gurnell Leisure Centre project, following our meeting last year?

Thank you

Planning & Development Manager



11-14 Grafton Street, London W1S 4EW www.be.co.uk



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Paul Robinson

From: @be.co.uk>

Sent: 09 March 2018 13:30 **To:**

Subject: Gurnell Leisure Centre

Follow Up Flag: Follow up Flag Status: Flagged



I know that our consultants have been in discussion but I wondered if there was any follow up to our meeting with yourself and Juliemma in terms of feedback and the need to organise another round table design session.

I look forward to hearing from you.

Regards

Simon

Director

11-14 Grafton Street, London W1S 4EW www.be.co.uk



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