

# GREATER **LONDON** AUTHORITY

  
Barton Willmore  


Our reference: GLA/4287/ADR

Date: 15 February 2019

Dear 

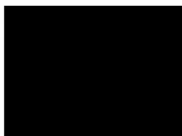
**Town & Country Planning Act 1990 (as amended); Greater London Authority Act 1999  
& 2007; Town & Country Planning (Mayor of London) Order 2008**

**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,



*pf* **John Finlayson**

Head of Development Management

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

1 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

- Andrew Russell, Principal Strategic Planner, GLA (case officer)
- [REDACTED] – Principal Strategic Planner (Urban Design), GLA
- Graham Clements – Team Leader, GLA
- Ioanna Mytilinaiou, GLA Energy Team
- Joseph Oakden, Transport for London

#### Applicant team

- [REDACTED] – EcoWorld (Client)
- Bob McCurry – Barton Willmore (Planning)
- Andrew Lightstone – Barton Willmore (Planning)
- [REDACTED] – Couch Perry Wilkes (Energy and Mechanical Engineering)
- [REDACTED] – Couch Perry Wilkes (Energy and Mechanical Engineering)
- [REDACTED] – 3D Reid (Architect)
- [REDACTED] – 3D Reid (Architect)
- [REDACTED] – Systra (Transport)

#### Local Planning Authority

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

2 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**

3 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**

5 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.

6 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.

7 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**

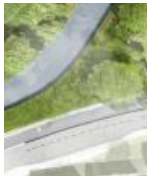
10 The scheme proposes the mixed use redevelopment of the site to provide a replacement leisure centre, 615 residential units, 498 sq.m. of commercial floorspace (Class A1-A3 use) a replacement BMX track, skate park and children's playspace, enhancements to the existing park, together with associated 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.

11 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.

12 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

13 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.

14 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 factors<sup>1</sup>.

15 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.

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

16 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.

17 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**

18 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

19 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.

20 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.

21 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.

22 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.

23 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

24 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

25 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.

26 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.

Table 1 – proposed housing mix

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

## Children's play space

27 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.

28 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

29 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.

30 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

31 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.

33 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.

34 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

35 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.

36 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.

37 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

38 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).

39 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.

40 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.

41 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.

42 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.

43 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.

44 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

45 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**

46 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**

47 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**

48 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.

49 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

50 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

51 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.

52 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

53 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

54 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

55 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**

56 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.

58 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.

59 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.

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