

Sir Sherard Cowper-Coles
Chair - Gurnell Leisure Centre Sounding Board
To: sherard@cowpercoles.com
Cc: SimsR@ealing.gov.uk, FAO all Sounding Board members



18TH AUGUST 2022

Dear Sherard,

We are writing to express our concerns regarding the proposals presented at the July Gurnell Community Sounding Board, and to request several topics for discussion at the next meeting (date TBC). We feel that these concerns should be addressed to the satisfaction of the Sounding Board ahead of any proposals going to the Cabinet for decision, which is currently timetabled for October 2022.

As a community group, Save Gurnell have been following this project closely for the past 6 years. Over that time, we have become "public experts" in the Gurnell project. We followed the various iterations of the previous design and reviewed all 140+ documents of the planning application. We also read all the commentary from the Mayor of London and the statutory consultees. All of this took hundreds of hours which was sacrificed from the personal lives of our campaign group members. They did this because they care about our local leisure centre and all the fellow citizens that will use it for generations to come.

We stand behind our previous campaign against inappropriate development on Metropolitan Open Land (MOL) but would like to assure you that the spirit of this letter is to be constructive and help our council avoid a similar outcome as the previous application. The previous scheme failed partly due to shortcomings during the early stages, therefore we should take the time to address any issues now before it's too late.

When the Sounding Board commenced in May, we felt incredibly positive about being involved with this project. We were very pleased to hear key messages such as, an "opportunity to think wider" and "reviewing all options." However, following the June and July meetings, our initial optimism has taken a significant hit. As a result, we would like to highlight our key areas of concern which are as follows:

1. Development on Metropolitan Open Land (MOL)
2. Lack of meaningful options, leisure centre specification and cost
3. Lack of transparency and detail regarding funding options
4. Lack of publication of Sounding Board papers and outputs

The remainder of this letter will take each item in turn and outline our requests.

1. DEVELOPMENT ON METROPOLITAN OPEN LAND (MOL)

The previous planning application was refused in March 2021, the reason being that "very special circumstances" did not exist and therefore the development was not justified:

Extract from the Decision Notice.

"The NPPF indicates that inappropriate development is, by definition, harmful to the Green Belt (and by implication MOL which according to the London Plan is treated in the same way) and should not be approved except in very special circumstances. In addition, there are adverse impacts on openness and by definition harm caused by the scale, massing and design of the development proposal. The benefits of the proposed development are therefore

not deemed to outweigh the by definition harm to the MOL. Consequently, the very special circumstances necessary to justify the development do not exist.”

Link here: [201695FUL documents](#)

We are extremely concerned that the options outlined in the July Sounding Board, would constitute inappropriate development on MOL and would therefore not receive planning permission. Construction of new buildings should be regarded as inappropriate on MOL unless the exceptions are met.

In Appendix 1 we have reviewed each exception for both the Leisure Centre and the residential elements of the proposal. Given this project is focused on the Leisure Centre replacement we have assessed the elements independently. To summarise:

- Residential
 - None of the exceptions apply to the residential element of the proposals
- Leisure Centre
 - Could be exempt but only if the openness of the MOL is preserved and the new centre would not be materially larger than the current one – which is not the case with the current proposal.

Based on the above, the “very special circumstances” test would need to be met. Given this test was not met on the previous application, and the revised proposals do not even include any affordable or social housing, we are struggling to see how this test would be met, and planning permission granted.

2. LACK OF MEANINGFUL OPTIONS, LEISURE CENTRE SPECIFICATION AND COST

Despite the earlier meetings suggesting that multiple options would be considered, the proposals presented in the July meeting only had two options:

- Option 1 - Enabling Development and Leisure in Existing Location. This is essentially the previous proposal.
- Option 2 - Enabling Development and Leisure in Alternative Location. This option proposes relocation of the Leisure Centre adjacent to Stockdove Way.

Given Option 1 is essentially the previous proposal (which was refused planning permission) it is not really an option, leaving us with just Option 2 which we have several concerns about:

- The Leisure Centre is proposed to be relocated to the North-West of the site on a Grade II Site of Importance for Nature Conservation (SINC Grade II).
- There would be a significant net loss of MOL as the current location of the Leisure Centre would become housing (unlike the previous application whereby development was restricted to the footprint of the current Leisure Centre and car park.
- The BMX track and Skate Park would be relocated to areas with a higher flood risk, would be materially larger than they are now and would be relocated to an area which was recently transformed into a wetlands area for wildlife. This area has received £375,000 in funding from the Mayor of London as part of the [Green Capital Grants](#). Apart from the flood risk, the plans would effectively destroy the green area that’s been transformed with the Mayor’s funding (from taxpayers.)
 - Link here: Sadiq awards £2M for green spaces as part of the [Green Capital Grants](#)

Additionally, the cost of the proposed centre feels very high, estimated at £55-60m for the Leisure Centre and £3-5m for landscaping (total £58-65m). This is an increase on the previous proposals of around £20m. GT3 Architects have a similar project in Staines (Spelthorne Leisure Centre) with an estimated development cost of £36m and Sports England guidance suggests the costs would be in the region of £30m. We appreciate these are not necessarily like for like comparisons, however there is a significant gap between these examples and the estimate for Gurnell which we are struggling to rationalize.

- [Facility Costs 1Q22 \(sportengland-production-files.s3.eu-west-2.amazonaws.com\)](#)
- [Spelthorne Leisure Centre - GT3 Architects](#)

Given the funding challenges, we feel that additional options should be considered starting from a like for like replacement, working up to the current proposal. This should include an option to maintain the leisure centre in its current location.

We understand that the results of the Vision workshop and survey suggested the community would like additional facilities, but the fact is that the funding does not exist and therefore we should be taking a more conservative position. It's important to keep in mind that the cost of the Leisure Centre increases the financial burden on the council and therefore the potential funding gap and need for an enabling development.

Should it be required, we must also consider the location of the enabling development i.e., can this be located on an alternative site or sites to prevent inappropriate development on MOL which should be the last resort not the first option.

3. LACK OF TRANSPARENCY AND DETAIL REGARDING FUNDING OPTIONS

With only £12m currently ringfenced from council funds, there is a funding gap to be addressed. The size of this gap will be dependent on the size and facility mix of the new centre as per section 2 above.

Our key concern here is that we feel the funding options are being somewhat glossed over and it is unclear to us exactly which routes have been progressed and the results. Given the size and facility mix of Option 2, the proposals are more akin to a regional facility rather than a local one and should therefore have some regional funding. For example, Crystal Palace National Sports Centre is receiving funding from the Mayor of London – has this funding avenue been exhausted?

4. SOUNDING BOARD MATERIALS AND OUTPUTS

The ToR sets out that the outputs from the meetings will be made publicly available. At the time of writing, and despite making this request at the last meeting, the materials have not yet been published. Part of our role on the Sounding Board is *“to provide feedback and discuss with their organizations and groups and refer these back to the sounding board.”* Without the key materials being public, it is impossible for us to update our stakeholders and gain feedback from them.

REQUESTED NEXT STEPS:

- Meeting material to be made publicly available as set out in the ToR for the Sounding Board – this should be implemented as a **matter of urgency**.
- This is an open letter; therefore, we request it be circulated to the Sounding Board members ahead of the next meeting.

- At the next meeting, we politely request the following agenda items:
 - Walkthrough of the MOL exceptions for both the Leisure Centre and potential residential elements and explanation to be provided as to how the planning team intend to address the “very special circumstance” test
 - Discuss and agree additional Leisure Centre facility mix and location options to be prepared and costed. Once prepared, these would need to be brought to another meeting for review by the Sounding Board.
 - Review in more detail what funding options have been explored, the outcome and seek to identify additional avenues for funding

We hope this letter has been taken in the spirit it is intended, and look forward to hearing back regarding the points above.

Kind regards,

Louise Simmonds (on behalf of Save Gurnell)

Link here: [National Planning Policy Framework - 13. Protecting Green Belt land - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/national-planning-policy-framework)

149. A local planning authority should regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are:

Exception	Does it apply? Leisure Centre	Does it apply? Residential
(a) buildings for agriculture and forestry;	NO	NO
(b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it;	POTENTIAL YES <ul style="list-style-type: none"> If the openness of the MOL is preserved. 	NO
(c) the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building;	NO <ul style="list-style-type: none"> The proposals are for a replacement rather than extension/alteration. 	NO
(d) the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;	NO <ul style="list-style-type: none"> Although this is a building replacement and of the same use it will be materially larger than the one it replaces (5,350 vs. 11,505 sqm). The location within the MOL under Option 2 is also different and on a SINC Grade II. 	NO
(e) limited infilling in villages;	NO	NO
(f) limited affordable housing for local community needs under policies set out in the development plan (including policies for rural exception sites); and	NO	NO <ul style="list-style-type: none"> The proposals do not include affordable housing and 500 units could not be considered “limited” in any case. Additionally, if Affordable Housing were to be included, this would need to be 50% as the land is Council owned.
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<p>(g) limited infilling or the partial or complete redevelopment of previously developed land, whether redundant or in continuing use (excluding temporary buildings), which would:</p> <ul style="list-style-type: none"> • not have a greater impact on the openness of the Green Belt than the existing development; or • not cause substantial harm to the openness of the Green Belt, where the development would re-use previously developed land and contribute to meeting an identified affordable housing need within the area of the local planning authority. 	<p>NO</p>	<p>NO</p> <ul style="list-style-type: none"> • The car park which is designated MOL does not equate to previously developed land (PDL) as no structure currently exists there. It also contains a great deal of biodiversity due to the hedges planted there. • 500 units cannot be considered “limited infilling”. The proposals constitute a complete redevelopment of the current car park. • They would have a greater impact on the openness of the MOL than the existing car park. • The housing development is supposed to be “enabling” and will therefore be private that then affordable. • The affordable housing need is unsubstantiated due to the lack of an Authority Monitoring Report (AMR).
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