

GURNELL LEISURE CENTRE PLANNING APPLICATION

SD01A: ALTERNATIVE SITES ASSESSMENT

APRIL 2024



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1. Introduction and background

- 1.1. This Alternative Sites Assessment has been prepared by Tibbalds Planning and Urban Design to support a hybrid application for mixed-use development consisting of a new, replacement leisure centre with enabling residential development and wider landscape improvements in the Pitshanger ward of the Borough. The description of development is:

“Hybrid planning application for comprehensive phased development incorporating the redevelopment of all existing buildings and structures and construction of new buildings comprising:

Full planning permission for the construction of a replacement leisure centre (Use Class F2(d)), including new car / coach / cycle parking and vehicular / pedestrian access arrangements, associated highways works, new and replacement play space, public realm, landscaping, and flood management to existing public open space.

Outline planning permission (means of access not reserved) for about 300 affordable and market housing enabling residential development (Use Class C3), and/or up to 340sq.m GIA of flexible commercial/retail space (Use Class E), public realm, play and amenity space and open space improvements.”

- 1.2. The site is owned by the London Borough of Ealing (LBE) and has an area of 13.2 hectares. It currently contains a leisure centre, a play area, surface car-parking, open parkland, and outdoor leisure facilities including an outdoor gym, playing fields, skatepark and BMX track. The entire site sits within Metropolitan Open Land (MOL), with the River Brent running through the site; from east to west. It is bounded by Ruislip Road East to the south, Argyle Road to the east and the Greatest Western Railway line which runs to the west of the site.
- 1.3. Built in the 1970s, the existing Gurnell Leisure Centre has served the local community as a fitness and wellbeing hub for several decades. The buildings are currently in a poor state of repair and have suffered significant water damage. The building’s declining condition led to its permanent closure in August 2020. The existing built form is not energy efficient, and these factors have contributed to the closure of the existing building which has been deemed ‘economically unsustainable’ to reopen.
- 1.4. Options have been explored to provide a re-imagined leisure centre on the site. The options explored include the reuse, retrofitting and re-purposing of the existing building. The demolition of the existing building and construction of a new leisure centre has been deemed the most viable and suitable option for replacing the existing facility.
- 1.5. The Ealing Sports Facility Strategy 2022-2031 identifies the importance of a replacement facility at Gurnell to meet both existing latent demand and potential future demand for swimming facilities within the Borough. The strategy recognises that a new Gurnell Leisure Centre will not just be a local asset but also a regionally significant facility through the provision of a 50m pool.
- 1.6. In Spring 2022, a design team was appointed by LBE in their capacity as landowner to prepare a planning application for a new, replacement leisure centre, alongside play areas, external facilities (skatepark, outdoor gym and BMX track) and enhancements to the adjacent parkland which will be submitted as a full planning application. The proposals include an element of enabling residential development of around 300 homes, with 35% affordable housing provision (measured by habitable room).

Metropolitan Open Land

- 1.7. The application site is designated as Metropolitan Open Land (MOL) which is defined in the London Plan (2021) as ‘strategic open land within the urban area’ that ‘plays an important role in London’s green infrastructure’. Policy G3 of the London Plan confirms that Metropolitan Open Land is afforded the same status and protection as Green Belt land and should be protected from ‘inappropriate development’ in accordance with the national planning policy tests that apply to the Green Belt.
- 1.8. The National Planning Policy Framework (NPPF) (December 2023) establishes that ‘inappropriate development’ is, by definition, harmful to the Green Belt and should not be approved except in ‘very special circumstances’. Substantial weight is given to any harm to the Green Belt when considering proposals for development on Green Belt land and ‘very special circumstances’ are only deemed to exist where any harm resulting from the proposal is clearly outweighed by other considerations.

- 1.9. Local Planning Authorities should regard the construction of new buildings as inappropriate except in certain specific circumstances that are regarded as exceptions to this requirement. The proposed development does not meet the exceptions set out in the NPPF and it is therefore necessary that the planning application demonstrates that 'very special circumstances' (VSC) exist in order for planning consent to be granted. The full VSC justification is set out within the Planning Statement that accompanies the planning application and this document should be read in conjunction with the relevant parts of that Statement.
- 1.10. One strand of the VSC justification is to demonstrate that the application site represents a 'genuine site of last resort' to deliver the proposed development. This document therefore undertakes an assessment of available alternative sites and compares them to the application site to establish whether the proposal could be delivered in a different location that would deliver the proposed development with either:
 - a greater degree of benefits; or
 - a lesser degree of harm.

Planning history

- 1.11. The application site is subject to a previous planning application (ref: 201695FUL) which was refused in May 2021. The reason for refusal was that the proposed development would harm the openness of the Metropolitan Open Land due to the scale, massing and design of the development proposal. The benefits of the scheme were not deemed to outweigh the harm caused, meaning that consequently the very special circumstances required to justify the development did not exist.
- 1.12. The scheme that is the subject of this planning application is notably different, both in terms of the overall quantum of residential development which has reduced in quantum from 599 residential units to around 300. But also in terms of its bulk, scale and massing and the relationship of the proposed development to the wider landscape.
- 1.13. As part of the previous application an Alternative Sites Assessment (October 2019) was undertaken by Barton Willmore LLP on behalf of Ecoworld Ltd. Whilst it was determined in the previous planning application that the very special circumstances needed to justify the previous scheme did not exist, it was accepted that the Alternative Sites Assessment (ASA) was a robust and reliable piece of work and that it was not this part of the justification that caused the application to be refused.
- 1.14. This updated ASA therefore draws on the work undertaken in the previous ASA and updates it where relevant to reflect the new proposals and updated availability of suitable alternative sites.

Document structure

- 1.15. This document sets out the assessment of alternative sites and is structured as follows:
 - The next section (2.0) sets out the methodology used to identify sites and review their suitability as an alternative location for the proposed development;
 - Section 3.0 sets out the results at each stage of the assessment; and
 - Section 4.0 provides a summary conclusion on the availability of alternative locations for the proposed development.
 - There are several appendices that set out each of the sites that have been considered alongside the assessments undertaken at each stage of the process.

2. Methodology

- 2.1. The main purpose of this assessment is to review the suitability of other available sites to deliver the proposed development and to confirm that the existing Gurnell Leisure Centre site represents a genuine 'site of last resort' for the proposed development.
- 2.2. The methodology for assessing suitability broadly aligns with the approach taken in the previous Alternative Sites Assessment by incorporating four key stages:
- **Stage 1: long list creation and sieving:** This stage involves compiling a 'long list' of potential alternative sites which are then 'sieved' by a series of agreed parameters to assess their suitability. Sites that meet all of the required parameters to be deemed to have the potential to offer a feasible alternative to the existing site are shortlisted to progress to Stage 2.
 - **Stage 2: Mini-assessments:** Sites that meet all the required parameters of the sieving process set out in Stage 1 progress to the mini-assessment stage. At this stage of the assessment the sites are categorised and explored in more detail against a set of criteria. The criteria are designed to allow for the advantages and disadvantages of developing on each site to be established against the baseline as established on the existing Gurnell Leisure Centre site.
 - **Stage 3: Capacity studies:** The outcome of the mini-assessment exercise results in sites scoring adequately enough to be further considered for a capacity study. The capacity studies review in more detail the capacity for each shortlisted site to accommodate the minimum development parameter
 - **Stage 4: Detailed assessments:** Each of the shortlisted sites from Stage 2 are also subject of a detailed assessment that looks in more detail at the unique circumstances of the sites and their capacity for development.
- 2.3. At the end of the four stage process set out above a conclusion is drawn as to whether there are any suitable alternative sites to the existing Gurnell Leisure Centre site.

Stage 1: Long list creation and sieving

Proposed minimum development parameters

- 2.4. In order to compile a long list of sites for consideration it is important to set out the parameters against which a site may be considered suitable for the proposed development. The proposed development consists of two separate uses (leisure and residential) and therefore minimum parameters for each separate use are suggested below.

Leisure Centre

- 2.5. The brief for the new, replacement leisure centre requires that a series of essential leisure functions must be provided as part of a single new facility. It is not possible or desirable for the separate leisure components proposed within the new facility to be split up and distributed across a number of sites as this would fail to meet Ealing's requirements and would not represent best and most efficient use of land.
- 2.6. The principle requirements of the leisure centre brief have not changed since the previous application was made and it is therefore proposed that the same minimum development parameters are used to search for potential alternative sites as in the previous ASA. The previous assessment established that the minimum footprint required to meet the requirements of the brief in a single building is 0.55ha excluding car parking and access roads. The footprint could be delivered in a number of different shapes and configurations but there must be a suitable space to accommodate the proposed 50m swimming pool and its associated plant and changing facilities. The pool and its ancillary accommodation would require a rectangular footprint of 0.25ha.
- 2.7. It is therefore established that in searching for an alternative site for the leisure centre sites must be a minimum of 0.55ha in size, with a shape that allows for an uninterrupted 0.25ha rectangular footprint for the pool.

Residential

- 2.8. The residential part of the proposed development serves a number of functions, but its principle aim is to support the delivery of the leisure centre by 'enabling' it through capital receipts. It is therefore not essential that the residential development is delivered on the same site as the leisure centre. Similarly, it is not necessary for all of the

residential units to be delivered on one site, as the same enabling function could be achieved by delivering the proposed 300 residential units across a number of smaller sites.

- 2.9. For a site to be considered suitable it must be able to deliver 'meaningful' residential provision which was established as part of the previous ASA to be a minimum of 50 units.
- 2.10. In order to establish the minimum site size that may be capable of delivering a 50 unit residential scheme it is proposed that 0.25ha is used. The basis for this minimum size of site is Policy H2 of the London Plan (2021) which specifically relates to 'small sites' and defines them as sites that are 0.25ha or below in area. The 2017 Strategic Housing Land Availability Assessment (SHLAA) which forms part of the evidence base for the London Plan sets out that the capacity of small sites is generally considered to be 25 homes or less.
- 2.11. Whilst the SHLAA assumes a maximum capacity of 25 units for sites of 0.25ha, which is less than the 50 unit minimum established above, it is acknowledged that there may be opportunities for smaller sites to achieve a higher density based on their unique circumstances and still comply with the policies set out in the London Plan. For this reason, it is considered appropriate that the minimum size of 0.25ha is used to identify potential appropriate alternative residential sites.

Area of search

- 2.12. The area of search for alternative sites is set as the administrative area of the London Borough of Ealing only. This is based on the need to re-provide an existing council owned leisure facility, currently located within LB Ealing, with associated enabling residential development which is needed to fund the redevelopment. It is therefore not feasible for either the leisure or the residential element of the proposals to be provided outside of the Borough.

Land ownership

- 2.13. It is agreed that only sites that are currently owned by LB Ealing are considered as potential alternatives. It would not be feasible for privately owned sites to be included because the council would not be able to compete with the private market to purchase them. Given there is already a significant funding gap for the leisure centre this would further contribute to the viability deficit of the project.

Long list creation

- 2.14. A long list of potential alternative sites has been compiled by updating the previous long list to include notable council acquisitions and disposals. Sites that have been acquired for the purposes of utilities or specifically to provide temporary accommodation have not been included since they would not be available for residential development within the timescales required.
- 2.15. Sites that are situated in the Green Belt or MOL are typically large expansive areas with no ownership changes between them. The same methodology as the previous ASA is therefore applied that these sites are subdivided along the boundary of any respective land use designations (MOL / Green Belt / Public Open Space / Community Open Space) as these typically denote changes to the use or the function of the land. This allows for a more accurate assessment of a smaller site.
- 2.16. This process has resulted in a long list of 544 individual sites that are appropriate for sieving through to the next stage of the assessment. The full long list is included at Appendix 1.

Cascade sieving

- 2.17. As set out in the methodology the first stage of assessing the long list is to 'sieve' the list using the development parameters established above so that sites that are either inappropriate, unsuitable or unavailable can be excluded from further more detailed review. The sites are categorised into either urban, public / community open space and Metropolitan Open Land / Green Belt sites.
- 2.18. The sites are considered sequentially with 'urban' sites that otherwise have no other designations or protection reviewed first. This follows the logic that brownfield sites and previously developed land should be prioritised for development.
- 2.19. Then sites that are designated as Public Open Space (POS) or Community Open Space (COS) are considered. These sites are locally protected from development by LB Ealing planning policy as spaces which should be retained as open space or for community uses.

- 2.20. Sites that are designated as Metropolitan Open Land (MOL) or Green Belt, which is a designation of national significance, are also considered for their development potential. Whilst the proposed development is considered 'inappropriate development' on MOL, there is the possibility that there are other MOL or Green Belt sites in the borough that might be more suitable for development than the existing Gurnell site and it is therefore appropriate to consider these sites as part of the assessment.
- 2.21. The sieving process is based on a cascade methodology where if the first criteria is not met, the site is not considered further. The criteria selected for the cascade sieve are:
- **Size:** The site must measure 0.25ha or greater in order to be able to meet the requirements of the minimum development parameters set out above.
 - **Medium Term Financial Strategy (MTFS):** The site should not have already been allocated for disposal as part of the Council's MTFS program. If a site has already been allocated for disposal it means that funds from its future sale have already been factored into the Council's delivery of services.
 - **Availability:** The site must be available to ensure a prompt commencement of development. The reasons why a site might not be available are:
 - If a site is leased out to a third party where there is still a substantial amount of time left remaining on the lease (more than 30 years).
 - The Council may lease the land even though the wider site or building is in freehold ownership to a third party.
 - If the site is a cemetery it would have to be deconsecrated to allow for its redevelopment. For this to happen the Ministry of Justice must grant a license for the existing remains to be exhumed. Neither of these processes are certainties and there is an onus on the developer to relocate the remains to another location. Given the cost and critical timescales required for this project, this level of uncertainty would not be viable. Cemeteries have therefore been excluded as appropriate alternative sites.
 - If the site is a council-run allotment, any redevelopment will require consent from the Secretary of State (SoS). To be able to grant consent the SoS must be satisfied that adequate allotment provision will be made elsewhere for existing allotment holders, or else formally recognise that such provision is unnecessary. This level of uncertainty therefore makes redeveloping council-run allotments unviable.
 - If the site is already part of a wider plan for redevelopment, as part of an implemented planning permission for example.
- 2.22. If a site is assessed positively against all criteria, it would mean that it may be suitable for redevelopment for either a new leisure centre and / or residential development and that the site is worthy of further exploration in the next stage.
- 2.23. A summary of the results of the cascade sieve are provided in Appendix 6.

Stage 2: mini-assessments

- 2.24. The sites that have made it through the sieving exercise in Stage 1 then pass on to Stage 2 for a more detailed analysis through a 'mini-assessment'. The mini-assessment involves each site being analysed against a set of more detailed criteria and scored for their performance in comparison to the existing Gurnell Leisure Centre site. This approach allows the advantages and disadvantages of alternative sites to be explored and any potential for environmental harm or benefit to be identified and considered.
- 2.25. The 2019 Alternative Sites Assessment established a set of criteria that formed the basis of the mini-assessments based on the constraints and opportunities of the existing Gurnell Leisure Centre site. The fundamental constraints and opportunities of the existing site have not changed and therefore the criteria used previously are still relevant. The proposed criteria cover the following key issues:
- sensitivity to change;
 - capacity to meet need; and
 - ability to generate a receipt.
- 2.26. For this stage of the assessment it is important to understand the unique and specific requirements of the leisure centre; and that whilst the assessment criteria above might establish that a site is appropriate for residential

development, it may not be appropriate for a new leisure centre. A 'leisure only' criteria is therefore also included so that an understanding of an individual sites capacity to support residential or leisure centre development is known at the end of the process.

- 2.27. Sites of each type (urban; POS / COS; MOL /GB) form part of the assessment and the criteria are adapted under the above key topics to reflect the different existing uses and development restrictions.
- 2.28. The tables below list out the criteria for undertaking the mini-assessments for each different type of site where Table 1 is to be used for urban sites; Table 2 is for POS and COS sites; and Table 3 sets out the criteria for MOL and GB sites.

Table 1: Stage 2 Mini Assessment Criteria for Urban Sites

CRITERIA		JUSTIFICATION
Part 1 – General Criteria		
1A – Sensitivity to Change		
1.	Flooding – What is the Flood Zone allocation?	Is the site more at risk of flooding than that of GLC?
2.	Is the site situated within or in close proximity to a Site of Importance for Nature Conservation (SINC) whereby its development would likely have an adverse SINC impact?	What level of risk would any potential development have on SINC, Green Corridors or any other Nature Conservation designation, by way of a major risk; minor risk; or no risk?
3.	TPO – Does the site contain a Tree Preservation Order (TPO)?	Are there are any TPO’s on site that could be harmed by potential development?
4.	Heritage Conservation - Does the site contain or is it in close proximity to Listed Buildings? And / or is the site located within or in close proximity to a Conservation Area(s)?	Are there any nearby heritage constraints or assets that could be harmed by potential development?
5.	Public Access - Does the site have public access?	Is the site accessible to members of the public, either paying or otherwise or is it inaccessible to all? If public, then its loss for redevelopment would be adverse on amenity terms.
1B – Capacity to meet need, and generate a receipt		
6.	PTAL – What is the PTAL for the site?	Is it more or less accessible by public transport than that of GLC?
7.	Density – What is the average Floor Area Ratio (FAR) of the site?	What is the existing FAR of the site according to the Ealing Borough Characterisation Study? Each site was classified as either having a low FAR (0.4-0.6) Medium FAR (0.6-1) and High FAR (1+) where higher density locations are expected to have the greatest scope to accommodate a large scale development.
8.	Previously Developed Land (PDL) – Does the site contain previously developed land?	The preference is always to ensure PDL is utilised first and foremost in any development. Existence of PDL is therefore a preference. Note: PDL includes carparks, MUGA’s, areas of hardstanding and permanent buildings; and excludes paths, roads, temporary structures and turfed pitches.
Part 2 – Additional Leisure Centre Criteria (Read in Conjunction with Part 1)		

9.	Shape (configuration) - Is the site able to accommodate a 0.55ha leisure centre with 10 lanes 50m swimming pool?	Is the site of a sufficient size to accommodate the leisure centre, with a shape allowing for a swimming pool? If not, then a leisure centre would not fit.
10a.	Catchment & Proximity - Can the site well serve the existing user group catchment?	Is the site within a 2km geodesic distance of the existing site? The need for any new leisure centre to continue to serve its original population is an essential requirement.

Table 2: Stage 2 Mini Assessment Criteria for POS / COS Sites

CRITERIA		JUSTIFICATION
Part 1 – General Criteria		
1A – Sensitivity to Change		
1.	Flooding – What is the Flood Zone allocation?	As per Table 1
2.	Is the site situated within or in close proximity to a Site of Importance for Nature Conservation (SINC) whereby its development would likely have an adverse SINC impact?	As per Table 1
3.	TPO – Does the site contain a Tree Preservation Order (TPO)?	As per Table 1
4.	Heritage Conservation - Does the site contain or is in close proximity to Listed Buildings? And / or is the site located within or in close proximity to a Conservation Area(s)?	As per Table 1
5a.	Public Access - Does the site have public access?	As per Table 1
5b.	Is the site located in an area of open space deficiency?	By their very function, POS and COS sites comprise open space highly sensitive to development. Where such open space is publicly accessible (as per criteria 5b) <u>and</u> in an area of open space deficiency, its redevelopment would be particularly adverse. Where a site is not publicly accessible however, this criteria would not be applicable.
2B – Capacity to meet need, and generate a receipt		
6.	PTAL – What is the PTAL for the site?	As per Table 1
7.	Density – What is the average Floor Area Ratio (FAR) of the site?	See Table 1
8.	Previously Developed Land – Does the site contain any previously developed land; and does it have a bigger combined quantum than that of the existing Gurnell site?	On sites designated for their open space provision, the policy preference is always to ensure PDL is utilised first and foremost. Thusly how does the site's PDL provision compare to that of GLC? In this respect, it has been agreed that a “similar PDL quantum to Gurnell” is within 25% of its actual provision; between 10,500 -17,500sqm.

Table 3: Stage 2 Mini Assessment Criteria for Green Belt and MOL Sites

CRITERIA		JUSTIFICATION
Part 1 – General Criteria		
1A – Sensitivity to Change		
1.	Flooding – What is the Flood Zone allocation?	As per Table 1
2.	Is the site situated within or in close proximity to a Site of Importance for Nature Conservation (SINC) whereby its development would likely have an adverse SINC impact?	As per Table 1
3.	Heritage Conservation - Does the site contain or is in close proximity to Listed Buildings? And / or is the site located within or in close proximity to a Conservation Area(s)?	As per Table 1
4a.	Public Access - Does the site have free and public access?	What level of accessibility does the site have and how does this compare to that of Gurnell? LB Ealing have compiled a map showing levels of free public accessibility onto MOL and GB land so this will be the primary data source. As in Table 1, the more accessible a site, the greater the adverse impact will be of its redevelopment.
4b.	Is the site located in an area of open space deficiency?	As per Table 2
2B – Capacity to meet need, and generate a receipt		
5.	PTAL – What is the PTAL for the site?	See Table 1
6.	Setting – What is the defined setting of the site?	See Table 1
7.	Vehicular Access – Does the site currently have vehicle access?	See Table 1
8.	Previously Developed Land – Does the site contain any previously developed land; and does it have a bigger combined quantum than that of the existing Gurnell site?	See Table 1
9.	Quality of Previously Developed Land - Does the PDL include any permanent buildings; and do they comprise a combined larger footprint than the existing GLC?	See Table 1
Part 2 – Additional Leisure Centre Criteria (Read in Conjunction with Part 1)		

10.	Shape (configuration) - Is the site able to accommodate a 0.55ha leisure centre with 10 lane 50m swimming pool?	See Table 1
11a.	Catchment & Proximity - Can the site well serve the existing user group catchment?	See Table 1
11b.	If yes, does it have better connectivity (PTAL) than the Leisure Centre?	See Table 1
12.	Co-location - Is the site co-located with other leisure uses in the near vicinity?	See Table 1

2.29. Sites are assessed against both Part A and B criteria so that suitability for both residential or leisure development is established. The tables include a section to note any other specifics that are not captured by the criteria, such as other planning designations or allocations that are worthy of note.

Proposed marking methodology

- 2.30. The core aim of the Stage 2 mini assessment is to be able to convert qualitative site information about potential alternative sites into a quantitative measure that allows for a comparison to be made against the existing Gurnell Leisure Centre site.
- 2.31. The proposed marking methodology is to define the benchmark score for the existing Gurnell Leisure Centre (GLC) site against the criteria set out above, and then mark each potential alternative site as either better or worse than current site where:
- Worse than GLC awarded -1
 - The same as GLC awarded 0
 - Better than GLC awarded +1
- 2.32. This stage of the assessment is intended to establish whether the proposed development could be delivered on an alternative site outside of the Green Belt / MOL / open space designations. If that is not possible then the assessment reviews whether there is an alternative Green Belt / MOL / open space site that could deliver the proposed development with either a greater degree of benefits or a lesser degree of harm in comparison to the existing site.
- 2.33. For this reason urban sites which score the same (0) or greater than the existing Gurnell Leisure Centre benchmark will be progressed. However, only Green Belt/MOL/Open Space sites which score greater than the Gurnell Site will be progressed to the detailed assessment. GB / MOL / Open space sites that score worse or the same as Gurnell will be excluded on the basis that they do not present clear benefits over the existing site.
- 2.34. At the end of each mini-assessment a summary will be provided of the residential (general criteria) score, and a summary of the score resulting from the four additional leisure centre questions (leisure score). The overall site score is the sum of these two numbers.
- 2.35. It is important to note that despite the overall score, if any site scores less than 0 (i.e. -1) on any of the four leisure criteria, the site cannot proceed for leisure use. This is because the four questions are fundamental to being able to re-provide the GLC on an alternative site, and thus any failures would rule out a site completely in this regard.

Defining the benchmark

- 2.36. The tables below set out the benchmark results for the existing Gurnell Leisure Centre site against each criteria. There are 3 separate tables to establish the benchmark for an Urban Site, a POS or COS site and MOL / GB sites.

Table 4: GLC Benchmark Assessment for Urban Sites

Part 1 – General Criteria		
1A – Sensitivity to change		
	Criteria	Answer
1	Flooding What is the Flood Zone allocation?	Predominately Flood Zone 3 with some Flood Zone 2
2	Nature Conservation Is the site situated within or in close proximity to a Site of Importance for Nature Conservation (SINC) whereby its development would likely have an adverse SINC impact?	A large area of the site is designated SINC. However, given the site size and development location, any potential harm to SINC is to be minor.
3	TPO Does the site contain TPO(s)?	No.
4	Heritage Conservation Does the site contain or is close proximity to Listed Buildings? And / or is the site located within or in close proximity to a Conservation Area?	No.
5	Public Access Does the site have public access?	Yes.
1B – Capacity to meet need, and generate a receipt		
	Criteria	Answer
6	PTAL What is the PTAL for the site?	2-3
7	Density What is the existing FAR of the site?	Medium
8	Previously Development Land Does the site contain previously developed land?	Yes.
Part 2 – Additional Leisure Centre Criteria (Read in Conjunction with Part 1)		
9	Shape (configuration) Is the site able to accommodate a 0.55ha leisure centre with a 10 lane, 50m swimming pool?	Yes.
10a	Catchment & Proximity Can the site well serve the existing user group catchment?	Yes.
10b	If yes, does it have better connectivity (PTAL) than the Leisure Centre?	Not Applicable.
11	Co-location Is the site co-located with other leisure uses in the near vicinity?	Yes.

Table 5: GLC Benchmark Assessment for the Public / Community Open Spaces

Part 1 – General Criteria		
1A – Sensitivity to change		
	Criteria	Answer
1	Flooding What is the Flood Zone allocation?	Predominately Flood Zone 3 with some Flood Zone 2
2	Nature Conservation Is the site situated within or in close proximity to a Site of Importance for Nature Conservation (SINC) whereby its development would likely have an adverse SINC impact?	A large area of the site is designated SINC. However, given the site size and development location, any potential harm to SINC is to be minor.
3	TPO Does the site contain TPO(s)?	No.
4	Heritage Conservation Does the site contain or is close proximity to Listed Buildings? And / or is the site located within or in close proximity to a Conservation Area?	No.
5a	Public Access Does the site have public access?	Yes.
5b	Open Space Deficiency Is the site located in an area of open space deficiency?	Majority of the site is not located in an area of deficiency.
1B – Capacity to meet need, and generate a receipt		
	Criteria	Answer
6	PTAL What is the PTAL for the site?	2-3
7	Density What is the defined FAR of the site?	Medium
8	Previously Development Land Does the site contain any previously developed land; and does it have a bigger combined quantum than that of the existing Gurnell site?	Yes. Circa 14,000sqm. +/-25%: 10,500 - 17,500sqm
9	Quality of Previously Development Land Does the PDL include any permanent buildings; and do they comprise a combined larger footprint than the existing GLC? (If no PDL exists on the site, then answer as 'no')	Yes!. Circa 4,500sqm. +/- 25%: 3,375sqm – 6,625sqm
Part 2 – Additional Leisure Centre Criteria (Read in Conjunction with Part 1)		
10	Shape (configuration) Is the site able to accommodate a 0.55ha leisure centre with a 10 lane, 50m swimming pool?	Yes.
11a	Catchment & Proximity Can the site well serve the existing user group catchment?	Yes.

11b	If yes, does it have better connectivity (PTAL) than the Leisure Centre?	Not Applicable.
12	Co-location Is the site co-located with other leisure uses in the near vicinity?	Yes.

Table 6: GLC Benchmark Assessment for Green Belt and MOL Sites

Part 1 – General Criteria		
1A – Sensitivity to change		
	Criteria	Answer
1	Flooding What is the Flood Zone allocation?	Predominately Flood Zone 3 with some Flood Zone 2
2	Nature Conservation Is the site situated within or in close proximity to a Site of Importance for Nature Conservation (SINC) whereby its development would likely have an adverse SINC impact?	A large area of the site is designated SINC. However, given the site size and development location, any potential harm to SINC is to be minor.
3	Heritage Conservation Does the site contain or is close proximity to Listed Buildings? And / or is the site located within or in close proximity to a Conservation Area?	No.
4a	Public Access Does the site have free and open public access?	A mix of semi public and full public.
4b	Open Space Deficiency Is the site located in an area of open space deficiency?	Majority of the site is not located in an area of deficiency.
1B – Capacity to meet need, and generate a receipt		
	Criteria	Answer
5	PTAL What is the PTAL for the site?	2-3
6	Density What is the defined FAR of the site?	Medium
7	Vehicular Access Does the site currently have vehicular access?	Yes.
8	Previously Development Land Does the site contain any previously developed land; and does it have a bigger combined quantum than that of the existing Gurnell site?	Yes. Circa 14,000sqm. +/-25%: 10,500 - 17,500sqm
9	Quality of Previously Development Land	Yes!. Circa 4,500sqm.

	Does the PDL include any permanent buildings; and do they comprise a combined larger footprint than the existing G LC? (If no PDL exists on the site, then answer as 'no')	+/- 25%: 3,375sqm – 6,625sqm
Part 2 – Additional Leisure Centre Criteria (Read in Conjunction with Part 1)		
10	Shape (configuration) Is the site able to accommodate a 0.55ha leisure centre with a 10 lane, 50m swimming pool?	Yes.
11a	Catchment & Proximity Can the site well serve the existing user group catchment?	Yes.
11b	If yes, does it have better connectivity (PTAL) than the Leisure Centre?	Not Applicable.
12	Co-location Is the site co-located with other leisure uses in the near vicinity?	Yes.

- 2.37. Blank templates that will be used for the mini-assessments for Urban Sites, Public and Community Open Space sites and Green Belt / Metropolitan Open Land sites are included at Appendix 2 of this document.
- 2.38. A summary of the results of the Stage 2: Mini Assessments are contained in Section 3 of this report. The full transcript of each Mini Assessment is included at Appendix 3 and divided into Appendix 3a: Urban Sites, Appendix 3b: Public / Community Open Spaces and Appendix 3c: Green Belt and MOL Sites.

Stage 3: capacity study

- 2.39. The main purpose of this Alternative Sites Assessment is to understand whether there are sites that could accommodate the proposed development in a way that delivers either greater benefits, or less harm than the existing Gurnell Leisure Centre site. To understand this in more detail it is important to review how much land in each shortlisted site would be required to accommodate the minimum development parameters established earlier in this document.
- 2.40. The development parameters establish that the the leisure centre must be delivered on a single site with a single fixed footprint of 0.55ha whereby 0.25ha must comprise a single rectangle able to accommodate the pool.
- 2.41. The residential element must be able to deliver a minimum of 50 residential units ensuring a “meaningful residential contribution. A minimum 50 unit scheme could be delivered across many of the shortlisted sites. However, the form and footprint of this could vary from site to site depending on each sites respective context and character.
- 2.42. It is therefore proposed that residential density is used as an appropriate metric by which to give a range for the likely residential capacity of a site. The London Borough of Ealing recently produced a Borough Character Study (2022) which forms part of the evidence base for the new Local Plan and has been used to inform the draft policies within it. The Character Study includes an assessment of average density across the Borough. The report expresses density as an average Floor Area Ratio (FAR) across the different neighbourhoods within the Borough. FAR is the ratio of a building's total floor area (gross floor area) in relation to the size of the piece of land upon which it is built. It is a useful way to measure the relationship between building heights, building coverage, the efficiency of the plots in which they sit and the physical density it results in.
- 2.43. The existing Gurnell Leisure Centre site sits within a neighbourhood that has an identified FAR of 0.74 in the Borough Character Study. The residential application proposals have a FAR of 2.19 based on the illustrative gross floor areas and the outline application boundary, which can reasonably assumed to be the maximum residential site area. This means that the proposals for Gurnell are approximately 2.96 times the existing average density of the surrounding area.
- 2.44. It is proposed that the following assumptions are used to establish a minimum and maximum residential density for each shortlisted site:
- A minimum Floor Area Ratio (FAR) measurement based on the average FAR of the neighbourhood within which each alternative site is situated as per the Borough Character Study (2022).

- A maximum Floor Area Ratio (FAR) based on the average density of the neighbourhood identified above multiplied by 2.96 to reflect the above average density of the proposed residential development.
- The above calculations will be used to establish a minimum and maximum gross area of residential floorspace. This figure can then be used to establish an equivalent number of residential units (assuming an average unit size of 75sq.m GEA based on a policy compliant unit size mix).

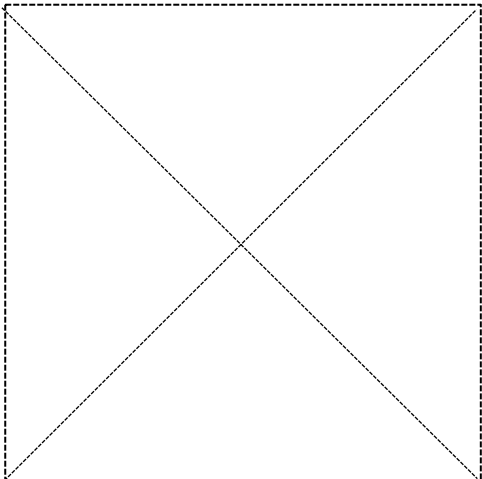
Site assessment criteria

2.45. In order to undertake the above calculations the following information will be gathered for each site:

- location;
- existing average residential density (FAR) as identified in the Borough Character Study (2022); and
- site size.

2.46. The above information will allow for a minimum and maximum residential capacity to be established for each site, alongside any potential positive or negative impacts. The assessment template and associated criteria are set out in the table below.

Capacity assessment template

Site Name	
Number: Reference number Aerial Image: 	Location: Postcode of the site PTAL: The PTAL rating for the site Size: The size of the Site in ha Existing FAR: The existing average residential density (FAR) as identified in the Borough Character Study (2022) Min. Capacity: The total residential capacity of the site if density stays in accordance with existing FAR Max. Optimum Capacity: Number of units at x2.96 of the existing FAR (reflecting density of our proposal)
50-unit scheme at maximum optimum capacity: The area that would be occupied by a 50-unit scheme at the same density as our proposal. This is calculated as follows: (Site Size / Max. Optimum Capacity) X 50.	

- 2.47. The benchmark assessment for the existing site is set out below and demonstrates that the existing site has a minimum residential capacity of 0.74 and a maximum residential capacity of 373 based on the methodology set out above.

Capacity Assessment Benchmark

Gurnell Leisure Centre, Ruislip Road East, W13 0AL	
Number: N/A Aerial Image: 	Location: Gurnell Leisure Centre, Ruislip Road East, W13 0AL PTAL: 3 Size: 1.42 ha Existing FAR: 0.74 Min. Capacity: 126 Max. Optimum Capacity: 373 units Please note the optimum capacity is over the application amount due to the proposed residential development being based upon an illustrative scheme.
50 unit scheme at maximum optimum capacity: 0.20ha (with a further 0.55ha leisure centre)	

2.48. The completed study assessments are included as Appendix 4 and a summary of the results are set out in Section 3.0 of this report.

Stage 4: Detailed Site Assessment

2.49. The sites that are shortlisted in this stage will have been assessed against specific environmental and physical constraints alongside their capacity to accommodate 50 residential units (and / or a leisure centre where feasible) with those sites showing few impacts making it to this stage.

2.50. The methodology to shortlist sites to this stage does not account for each site's unique circumstances in terms of layout, quality and use. The final stage of the assessment is to therefore undertake detailed site assessments that explore the specific circumstances of each shortlisted site in order to establish the following:

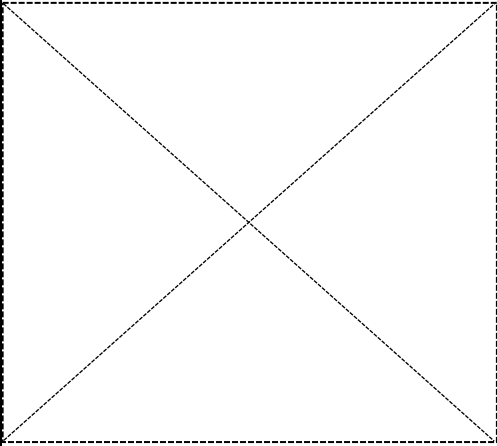
- Site quality in terms of layout, uses and existing facilities;
- The optimum location on the site for the proposed minimum level of development (and leisure centre where relevant);
- Resulting impacts the proposed minimum level of development (and leisure centre where relevant) would have on site quality;
- Given the resulting impacts, the scope for the level of residential development to be increased above the minimum 50 unit requirement.

2.51. The results of this assessment are then compared to the existing Gurnell Leisure Centre site to evaluate whether the site is a genuine suitable alternative, in comparison to the benchmark, where the benefits would outweigh any adverse impacts. If this principle is not demonstrated the site is then discounted as a suitable alternative to the existing site.

2.52. The assessment criteria for the detailed assessments are set out in the table below. All sites will be assessed through the same set of criteria whether they are Urban, Community and Public Open Space, or Green Belt and MOL land. This will ensure impartiality when compared against the existing GLC Site which is designated MOL.

Detailed Assessment Criteria:

CRITERIA		JUSTIFICATION
General Site Description		
Is the site irregularly shaped; what is it bounded by; what designations does it have; what uses is it shortlisted for; and what is the minimum size required to accommodate the 50 residential unit contribution?		
A – Site Quality		
1.	Site character – Is the site built up in character or open?	Does the site contain any permanent structures or PDL, or is it entirely greenfield land?
2.	Layout – Are any area of open space formally laidout, with defined areas of landscape character and use?	What is the structure of the open space, and does it have defined areas or sections?
3.	Land uses - What are the current land uses across the site?	What function does the site currently serve?
4.	Quality recognition – Has the site received any recognition (locally or nationally) for the quality of its facilities?	Green flag awards or details of LB Ealing's open space audit if the site comprises a park. Where it includes a building, are its facilities notable in any way? For instance, if a school, what is its Ofsted Rating?

B – Optimum Development Location		
5.		Given the environmental and contextual constraints of the site identified through the previous assessments, what is the optimum location for development (resi and / or leisure) on the site that, whilst causing minimal impact, will ensure it can still viably operate? The considered location will be shown on the adjacent aerial image. Where a site has been shortlisted for both leisure and residential, the locational possibilities will be explored for each use. The area indicated for the leisure centre will be 0.55ha and the area indicated for the 50 residential units would be as generated through the Stage 2: Capacity Assessment.
C – Impacts of Proposed Development		
6.	Site character – To what extent would the development (if at all) alter or change the site's character?	What are the impacts and how, if at all, do they compare to the existing GLC Site?
7.	Layout – Can the development be accommodated without adversely altering the form and layout of the site?	What are the impacts and how, if at all, do they compare to the existing GLC Site?
8.	Land uses - What impact would the development have on the existing land uses?	What are the impacts and how, if at all, do they compare to the existing GLC Site?
9.	Quality recognition – Would the proposed development have an impact which may prejudice any previously received recognition?	What are the impacts and how, if at all, do they compare to the existing GLC Site?
D – Scope for Development Above 50 Units		
10.	Do the site conditions allow for an increased level of height or else an increased residential footprint in a way that would not otherwise result in adverse impacts? If so, would this allow the site to accommodate a dwelling provision higher than 50?	
Final Consideration: Based on the above factors, does the site present an opportunity to accommodate development in a way that result in fewer adverse local impacts than that of GLC?		

2.53. The benchmark assessment of the existing site against the above criteria is set out at Appendix 5. The impact of development on all of the proposed shortlisted sites will be compared to this to review which site on balance is more suitable for the proposed development.

3. Results

3.1. This section of the reports summarises the results of each stage of the assessment process.

Stage 1: Long List Sieving

The Long List

3.2. A long list of 544 sites was compiled using the methodology set out in the methodology section. The full list is included at Appendix 1. The number of sites on the long list within each of the three separate categories is:

- 230 sites are urban;
- 197 sites are designated public or community open space; and
- 117 sites are designated MOL or Green Belt

Cascade sieving

3.3. The cascade sieve of the long list resulted in the following numbers of sites being excluded under each of the assessment criteria:

- Size – 256 sites were excluded on the basis that their site area was below the 0.25Ha threshold (see table at Appendix 6 for detail of excluded sites). The 288 remaining sites were progressed to the next sieving criteria.
- Medium Term Financial Strategy (MTFS) - 27 of the sites were excluded on the basis that they have been disposed of or allocated for disposal as part of the Council's Medium Term Financial Strategy (see table at Appendix 6 for detail of excluded sites). The remaining 261 sites were then progressed onto the next sieving criteria.
- Availability – 79 of the sites were excluded on the basis that they were not genuinely available in a way that would ensure commencement of construction within the necessary timescales for the project (see table at Appendix 6 for detail of excluded sites). The remaining 182 sites were then taken forward for mini-assessments at the next Stage of the process.

Stage 2: Mini-Assessment

3.4. The Stage 1 process resulted in 182 sites being progressed for mini-assessment. The full list of sites and their associated mini-assessments are set out in Appendix 3. Of the 182 sites that underwent the mini-assessment 171 were eliminated on the basis that they did not score better than the benchmark established by the existing Gurnell Leisure Centre site.

3.5. The remaining 11 sites were then progressed to Stage 3 (Capacity Study). The shortlisted sites are set out in the table below, alongside the uses they were identified as being most suitable for:

Ref:	Site	Leisure	Resi
56	Chestnut Lodge, Woodfield Road, Ealing W5 1SL	N	Y
61	Elm Lodge, Marley Close	N	Y
63	Martin House, Swift Road	N	Y
273	Windmill Lane Recreation Ground	N	Y
337	Ravenor Park	Y	N
341	Acton High School Sports Ground	N	Y
425	St Columba's Tennis Club, Carbury Avenue	N	Y
461	Brent Meadow / Conolly Dell (Brent Meadow, Southall)	Y	N

485	Ruislip Road East at Brentside School	Y	Y
486	Ealing Golf Course North of River Brent (Hanwell Town Football Club)	Y	Y
506	Acton Park – Bromyard Avenue Area (Land South of Bromyard Open Space and Land)	N	Y

Stage 3 and 4: Capacity Studies and Detailed Site Assessment

- 3.6. This section of the report sets out the result of the more detailed studies undertaken of the most suitable sites identified through the assessment process.

Capacity Studies

- 3.7. The 11 shortlisted sites have been assessed for their residential capacities as per the methodology set out in Section 2.0 of this report. All sites demonstrate that they have theoretical capacity to accommodate 50 residential units and are therefore assessed in detail at the next stage. The full assessments are included at Appendix 4.

Detailed Site Assessment

- 3.8. In addition to the capacity study exercise set out above each of the sites have been subject to a detailed site assessment looking at the unique and specific circumstances of each of the sites. The detailed site assessments are included at Appendix 8 but the table below provides a brief summary of the conclusions of the assessment.

Site and Conclusion	Development Potential Summary
56: Chestnut Lodge, Woodfield Road, Ealing, W5 1SL A minimum 50 unit scheme on the western portion of the site would require the loss of the care home's existing car park. The result would be substantial loss of care home amenity and jeopardization of its operation. Whilst there may be scope to put car parking underground and incorporate any lost care home floorspace back into a new development, the short term upheaval on existing residents and long term adverse impacts on the quality of the care home as a whole would be majorly adverse. In addition to this, the home would lose its western outlook which in itself would require a substantial reconfiguration. Relocating the care home (in part or as a whole) as part of this process is not an option as it is beyond the remit and critical time period required to support the construction of a new leisure centre in the borough. In this regard, the existing GLC Site is better suited to the residential uses proposed as, not only could it accommodate the full 300 enabling units required but it would require no relocation of existing uses; neither would it adversely impact upon the usability of the existing open space or character of the wider area.	GLC better suited for residential

61: Elm Lodge, Marley Close A minimum 50 unit scheme on the eastern portion of the site would require the loss of part of the care home's existing car park and amenity areas alongside the loss of a portion of the care home itself. This new residential element would likely take the form of a 4-6 storey mass which, given the site's generally obscured location away from the road, would not be considered an incongruous intervention. However, should there be a requirement to reprovide any lost care home floorspace back into the development, impacts on final scale would be significant potentially necessitating a mixed-use scheme of circa 9 storeys in height. Within this context and adjacent to a SINC, such height would be majorly adverse. Whilst there may be scope in future to relocate the care home (in part or as a whole) off site, this is not an immediate option as it is beyond the remit and critical time period required to support the construction of a new leisure centre in the borough. In this regard, the existing GLC Site is better suited to the residential uses proposed as, not only could it accommodate the full 300 enabling units required but it would require no relocation of or harm to existing uses.	GLC better suited for residential
63 Martin House, Swift Road A minimum 50 unit scheme on the north eastern portion of the site would require the loss of the majority of the care home's existing car park and alongside the loss of a portion of the care home itself. This new residential element would likely take the form of a 6 storey mass. Whilst otherwise suitable for an urban location, its constrained nature and visible position may risk it being seen as overly bulky. More importantly however is its adverse impact on the site's existing care home land use. Should there be a requirement to reprovide lost care home floorspace back into the development, impacts on final scale would be significant – potentially adding another 3 floors to the minimum residential height of 6 storeys. Within this constrained context, such height would be considered majorly adverse. This should be seen alongside the general and substantial reconfigurations also required to the existing care home building. Whilst there may be future scope to relocate the care home (in part or as a whole) off site, this is not an immediate option as it is beyond the remit and critical time period required to support the construction of a new leisure centre in the borough. In this regard, the existing GLC Site is better suited to the residential uses proposed as, not only could it accommodate the full 300 enabling units required but it would require no relocation of or harm to existing uses.	GLC better suited for residential
273 Windmill Lane Recreation Ground A minimum 50 unit scheme on the site, would allow for the existing Windmill Lane façade to be infilled – which may be seen as a positive. However, this would likely be outweighed by the substantial harm caused by the prevailing loss of an accessible and equipped designated public open space; a space which is rated significantly higher than the existing GLC site in terms of quality. In this regard, the existing GLC Site is better suited to the residential uses proposed as, not only could it accommodate the full 300 enabling units required but it would result in no net loss of greenfield land and no adverse impacts on the usability of the wider park.	GLC better suited for residential

337: Ravenor Park, Greenford, UB6 9LG The park's substantial size is to its benefit in this case, as a minimum 50 unit residential development to the north western corner would unlikely result in any significant adverse impacts on the park's usability or layout. Similarly, any local impacts on openness would dissipate as one proceeds into the main park area. In this respect therefore Ravenor Park presents a good prospect for the minimum enabling residential scheme. However, it is still a fundamental issue that the residential development would be constructed entirely on greenfield land, designated as Public Open Space and currently fully publicly accessible. In space amenity terms therefore this will therefore have an adverse impact – an impact that does not extend to GLC given that the proposed residential development here would be constructed on land that, in itself, already has limited public access and would not require the loss of any greenfield land. GLC is therefore more suited to the provision of residential. In terms of the leisure centre, in order to operate in Ravenor Park it must be within close proximity to a main road – to the south west corner. However, in this respect it obscures a key sight line and access point into the park; will increase the amount of traffic entering; would prejudice a SINC; and will require the reprovision of the MUGA. In this respect, the existing GLC Site is more suited to the provision of a new leisure centre than this site given that one already exists here so it is already suited to the needs of such a provision.	GLC better suited for residential and Leisure Centre
341: Acton High School Sports Ground The site's substantial size is to its benefit in this case, as a minimum 50 unit residential development to the western side would unlikely result in any significant adverse impacts on the site's usability or layout. In this respect therefore the site presents a good prospect for the minimum enabling residential scheme. Accordingly, developing this would not result in the direct loss of school buildings, neither would it adversely impact on the borough's wider open space provision. However, given its core function, any harm to this school (or its essential outdoor areas) as a result of development would likely be resisted in the strongest possible terms. In light of the above constraints, it is considered that the existing GLC site is more suited to the provision of residential units. The GLC site if redeveloped would not require the loss, harm, or downsizing of any school facilities.	GLC better suited for residential
425: St Columba's Tennis Club, Carbury Avenue, W3 9AL The size of the site is its major constraint in this respect. The minimum 50 unit scheme would require the loss of the existing tennis courts and tennis building, with the additional potential for harm to be inflicted upon the SINC allotment space to the north. At the time of writing, LB Ealing's Sports Facility Strategy (2022-2031) stated that "Ealing has a good stock of tennis courts and clubs" though with the view that by 2031 there would be a need for additional courts. Accordingly, the loss of these tennis courts for residential will highly likely be resisted. The existing GLC Site is therefore more suitable for residential development as it would not result in the loss of, or adverse impacts to any existing sporting facilities. Quite the contrary, the proposal on the GLC Site would actively enhance them.	GLC better suited for residential

461: Brent Meadow / Conolly Dell (Brent Meadow, Southall) The park's substantial size is to its benefit in this case, as a minimum 50 unit residential development on the southern side would unlikely result in any significant adverse impacts on the site's usability or layout with the exception of views of the viaduct becoming restricted by the construction of the units. Similarly, any local impacts on openness would dissipate as one proceeds into the main park area. In this respect therefore Brent Meadow presents a good prospect for the minimum enabling residential scheme. However, it is still a fundamental issue that the residential development would be constructed entirely on MOL and currently fully publicly accessible. In space amenity terms therefore this will therefore have an adverse impact – an impact that does not extend to GLC given that the proposed residential development here would be constructed primarily on land that, in itself, already has limited public access and would not require the loss of any greenfield land. GLC is therefore more suited to the provision of residential.	GLC better suited for residential
485: Ruislip Road East at Brentside School The MOL Site is relatively small though intensively used, comprising a recently constructed school, a new MUGA and landscaping to the north SINC. Whilst a benefit of this is that a fair degree of new development can take place on PDL rather than greenfield land, it also means that any additional development will result in the loss of school facilities – either external or internal – alongside harm to the existing SINC. The optimum area for the residential uses is that which, whilst designated SINC, is earmarked for landscaping and informal open amenity space for pupils. Accordingly, developing this would not result in the direct loss of school buildings, neither would it adversely impact on the borough's wider open space provision. However, given its core borough function, any harm to this school (or its essential outdoor areas) as a result of development would likely be resisted in the strongest possible terms; more so given the school facilities are (at the time of writing) less than 10 years old. If this site is selected for the leisure centre, once constructed it could offer an advantage to the retained school by way of the sharing and co-location of sporting facilities. In this instant, there may also be the opportunity for a substantial provision of new residential uses to co-locate above it. However, whilst this presents the optimum solution for this Site, it would not outweigh the much wider harm to the school which would result from the direct loss of facilities. It should also be considered in this instant that should the leisure centre be constructed on the existing GLC site, it would only be a short distance from here anyway. In light of the above constraints, it is considered that the existing GLC site is more suited to the provision of both residential and leisure than this site. Whilst both are MOL, the GLC site if redeveloped would not require the loss, harm, or downsizing of any school facilities. Neither would it result in substantial harm to a SINC.	GLC better suited for residential and Leisure Centre

486: Ealing Golf Course, North of River Brent (Hanwell Town Football Club) Whilst the site is not considered publicly accessible open space, it still provides the key function within the borough of hosting a football club, providing formal training playing facilities to members of the public, and hosting children's day care. Whilst the establishment of residential uses here would not fundamentally harm this function, the resulting loss of the car park would likely be resisted in the strongest possible terms. Not only would this reduce the general accessibility of the site, but on match days the resulting impact to the wider area would be majorly adverse as a result of the associated car parking displacement. A new leisure centre here would result in the loss of a formal, floodlit playing pitch. Whilst in response, this pitch could relocate to the northern portion of the site, it would still likely be an unacceptable adverse impact that would majorly prejudice the operation and competitiveness of the football club. Accordingly, the existing GLC Site is considered to be better suited for proposed residential and leisure provision on the basis that the co-location of a new leisure centre here alongside all requisite 300 residential units would involve the loss of no MOL greenfield land; and no adverse impacts on the site's usability and sporting and leisure function.	GLC better suited for residential and Leisure Centre
506: Acton Park – Bromyard Avenue Area (Land South of Bromyard Open Space and Land) New residential uses on this site would comprise entirely PDL. They would not adversely impact upon the facilities provided by the existing leisure centre neither would it harm the adjacent allotments or designated SINC land. Accordingly, this site provides one of the best opportunities for the provision of residential uses – particularly given that it has a lot in common with the existing GLC Site; with its 2-3 PTAL; leisure uses; MOL designation; and the fact that all residential development proposed can be contained on a PDL carpark. However, in terms of the PDL itself its function is that of a well-used car park which currently serves a number of surrounding sports and leisure facilities. Developing over this car park would therefore result in the displacement of these spaces. There does not appear to be any scope for the displaced parking to be relocated elsewhere across the site without the fundamental loss of sporting facilities. Neither would there be scope for the parking to be located within the new residential development as the site is highly constrained in space terms and the residential units themselves would also require car parking. Accordingly, the current car parking would be displaced off site and into the surrounding area. Given the generally low PTAL of the site, this may have implications on the quality of the wider area and the ability for the public to access the leisure facilities. Conversely, whilst the existing GLC Site would also require the building over of the car park, the relatively unconstrained nature of the site would allow for its full reprovision in a new basement. Here, leisure centre car parking and residential car parking could be provided side by side, resulting in no parking displacement and no adverse impacts on users within the borough who have mobility issues. Accordingly, the Acton Park – Bromyard Avenue Area Site is not considered to be suitable for the minimum provision of residential uses.	GLC better suited for residential

4. Conclusion

- 4.1. The summary above establishes that each of the 11 sites assessed are unique with their own set of constraints, uses and opportunities. Whilst some have fewer constraints than others with a greater capacity to accommodate development, on balance it is considered that none are able to appropriately support a meaningful provision of residential uses to the same degree and with as minimal an impact as that of the existing GLC site – much less accommodate both the residential and leisure uses at the same time.
- 4.2. Accordingly, it is considered the existing Gurnell Leisure Centre Site represents the genuine site of last resort in terms of providing a new leisure centre alongside the requisite enabling 300 residential units.

Appendices

Appendix 1: Long list with summary of results by Stage

Appendix 2: Mini-Assessment blank templates

Appendix 3: completed Mini-Assessments

- **Appendix 3a: Urban Sites**
- **Appendix 3b: Public / Community Open Spaces**
- **Appendix 3c: Green Belt and MOL Sites**

Appendix 4: Completed Capacity assessments

Appendix 5: Detailed benchmark assessment of the existing Gurnell Leisure Centre site

Appendix 6: Results: sites removed after cascade sieve (based on size, MTFS, availability)

Appendix 7: Results: Sites removed after mini-assessments undertaken at Stage 2

Appendix 8: Detailed Site Assessments undertaken at Stage 4