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Your Ref.:
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Planning Department
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Dear Planning Department

Planning Application Reference: 2015/1444/P

Site: Mansfield Bowling Club, Croftdown Road, London, NW5 1EP

Proposal: Creation of a new publically accessible open space, enhanced tennis facilities including the re-configuration and extension of the courts to provide an additional court and increased playing area to accord with the LTA requirements; the provision of a new ancillary pavillion (Class D2) to replace existing ancillary buildings and structures providing community and leisure space, a new community garden, and building with a new part three storey, part 2 storey building providing 21 residential dwellings (Class C3) with associated access, parking and landscaping.

I refer to the letter dated 12 May 2015 from Katy Walker, Planning Manager for Sport England, London Region.

Having been an independent advisor to the London Borough of Camden Planning Department (LBCPD) on the pre-application discussion regarding the Mansfield Bowling Club (MBC) site and having prepared the London Borough of Camden Indoor and Built Facility Needs Assessment, Strategy and Action Plan Knight Kavanagh and Page (KKP) has the following observations to make on the Sport England letter of objection, noted above.

Pre-application discussions were led, on behalf of the planning authority, the London Borough of Camden, by Principal Planning Officer Jonathan Markwell. Prior to the submission of planning application 2015/1444P Jonathan Markwell left LBCPD.

Pre-application advice from KKP to the London Borough of Camden was focused on the methodology taken by the applicant's (Generator Group) sport and leisure planning advisors, The Sport & Leisure Consultancy (SLC), on establishing the need for the existing leisure uses on the MBC site and an investigation of potential alternative leisure uses.

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KKP concluded that the approach taken by SLC was in accordance with the principles of Sport England Guidance 'Assessing Needs and Opportunities Guide for Indoor and Outdoor Facilities - How to undertake and apply needs assessments for Sport' ((ANOG published in July 2014).

Indoor Bowls

In respect of indoor bowls, SLC concluded that MBC has disbanded and would be unable to return the facilities to a playing standard. Members of MBC have dispersed into other local clubs. None of the local clubs are full and they can all accommodate new members. (see paragraphs 3.5.1 – 3.5.8 Sport and Leisure Report Mansfield Bowling Club, January 2015 Final Version 1.0)

in the independent assessment of the SLC report, KKP agreed with the conclusions drawn in respect of bowls and could see no evidence to indicate a need for indoor (or outdoor bowls) provision to meet unmet or latent demand.

KKP also spoke with Stephen Rodwell, the England Indoor Bowling Association (EIBA) Development Manager; who, albeit reluctantly, agreed that indoor bowls participation was in decline and that there was no unmet demand for indoor bowls in the area of Camden to sustain the now dilapidated and redundant indoor bowling facility at the site in Croftdown Road.

Tennis

In respect of tennis provision, SLC identified and acknowledged the demand from the local Kenlyn Tennis Club to remain active at the Croftdown Road site. Through the re-development an additional tennis court and enhanced ancillary facilities will be provided. This will enable the club to grow its membership numbers and become a community based sustainable facility. The proposal has the support of the LTA, the national governing body for tennis.

KKP examined the detailed proposal put forward by SLC and agreed that the additional facilities would bring long term sustainability to a community club, based in an area of London where tennis is a popular sport.

Complimentary Uses

SLC subsequently examined complimentary uses, concluding that the site should include an element of publicly accessible open space to help address local open space deficiencies, thus enhancing its community value and usage by local residents. Although currently open in nature the site is designated as Private Open Space and therefore not available to the local community.

SLC also recommended the inclusion of play provision (para 5.3.13) to increase the community value of the site, encourage access from a greater cross section of the community, and help to address the local deficiency in access to children's play provision, as identified in the Open Space, Sport and Recreation Study dated June 2014.

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Alternative Leisure Uses

Finally SLC investigated alternative leisure uses as follows:

- ◀ Athletics Track
- ◀ BMX Track
- ◀ Cinema
- ◀ Cricket Pitch
- ◀ Football Pitch
- ◀ Five – a – side soccer
- ◀ Multi-Use Games Area (MUGA)
- ◀ Music Venue
- ◀ Rugby Union Pitch
- ◀ Skate Park
- ◀ Sports Hall / Multi-Use Indoor Space
- ◀ Swimming Pool and
- ◀ Theatre
- ◀ Health & Fitness

As set out in para 8.1.10 these were all discounted from a suitability perspective.

Sport England Objection

Sport England objected to application 1444/P on the following basis

The application results in the loss of existing buildings and land currently in sporting use.

KKP wish to comment as follows:

The application will result in the permanent loss of the indoor bowls building and the outdoor bowling green, both previously home to Mansfield Bowling Club (MBC). Both facilities closed in 2013 and are now in disrepair, redundant and not fit for purpose. In 2013 membership of the MBC fell to 70 members, a decline over 25 years from its peak of 505 members in 1987. Sport England recommend 80 -100 members per rink for an indoor facility.

There is no prospect of MBC returning to this site with the existing membership dispersed amongst other clubs and no other evidence to suggest that demand for bowls will grow to a level where there is a need to reinstate the facility.

However, a community tennis club will remain on site. Through the enabling development it will have an additional tennis court and new ancillary pavilion facilities. The development will enable the membership to grow, and the club will, in the long term, be more sustainable. The LTA supports the proposal.

Whilst redundant bowls provision will be lost, tennis will gain facilities and be in a stronger position to increase participation in a sport which is popular, and in demand in this area of London.

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The NPPF states that in order to be considered acceptable, open space, sports and recreational buildings and land should not be built on unless:

- ◀ An assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements:
- ◀ The loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location
- ◀ The development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.

The proposal is in accordance with this guidance and should be viewed as acceptable. Sport England does not appear to accept the evidence that there is no demand for indoor bowls to sustain the MBC facilities. Sport England states 'we expect this finding to be cross checked by the LPA against direct representations submitted by the Bowls community'.

In the report submitted by SLC, Camden Planning Officer, Johnathan Markwell instructed SLC to survey the bowls community. SLC undertook this. The survey findings in the report, submitted as part of the planning application, clearly identified capacity for new member's at all existing indoor bowling clubs. Of the 62% of clubs that responded to the SLC survey, none were full, with many commenting on the difficulty recruiting new members. This finding is mirrored nationally, a position confirmed by EIBA, both to SLC and KKP.

Through appointing KKP to review the SLC report at pre- application stage, the views of the bowls community have been reviewed.

This objection from Sport England is not substantiated with evidence and should be challenged.

Need for a Sports Hall

The Borough wide sports and leisure facility strategy clearly identifies a shortfall of sports hall provision across Camden, a position mirrored throughout London and exacerbated in inner London where land is scarce and expensive. Furthermore, many Building Schools for the Future (BSF) projects in London were halted by the Government before replacement school teaching and sports facilities were developed. This further exacerbated the shortfall and poor quality of the provision.

Recommendation R2 of the LBC 2015 Draft Sports and Leisure Strategy states:

Camden Council should continue to support the development of new sports halls across the Borough, and work with providers to facilitate public access to support the voluntary club sector, through the provision of community use agreements. A key geographical area for new provision is south of the Euston Road and the Kilburn/West Hampstead interchange area.

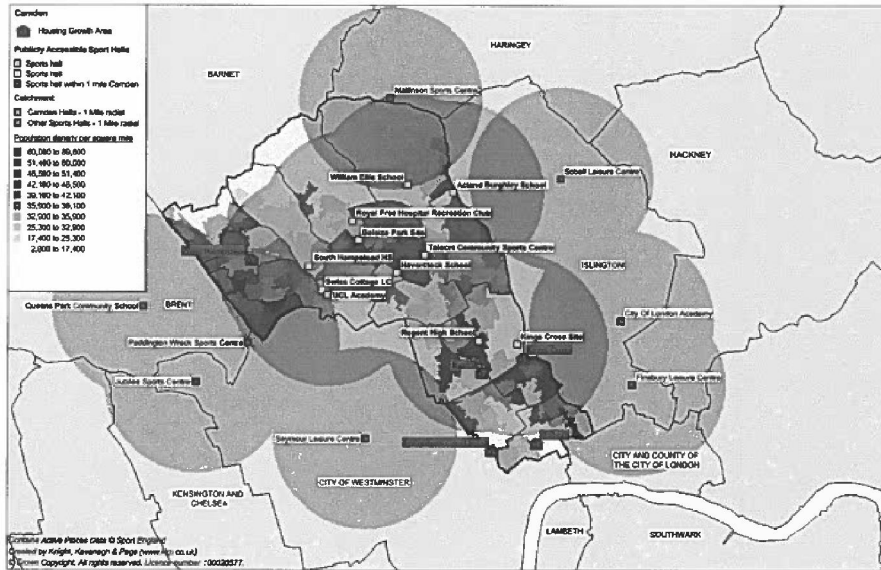
There is a significant shortfall in sports hall provision throughout Camden, the equivalent of 21 badminton courts according to Sport England's Facilities Planning Model (FPM). This shortfall in provision is a constraint on recreational play in some sports as well as the development of the voluntary club sector. Existing provision is unable to accommodate latent and unmet demand for space to play indoor sports that are played in a sports hall environment.

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The area south of the Euston Road is, with the exception of the YMCA Club on Tottenham Court Road, bereft of publicly accessible indoor sports hall facilities. Similarly, the area around the Kilburn/West Hampstead interchange area also appears to have limited supply of facilities. However, the FPM analysis indicates that in general all areas can accommodate additional sports hall provision.

Figure 1: Accessible sports hall provision for Camden's residents



The Indoor Sports and Leisure Strategy was prepared in 2014/15 and included consultation with the Department of Schools and Families and voluntary sector clubs. At no time during the consultation was the requirement for a sports hall to be developed on the MBC site in Croftdown Road raised. Furthermore, none of the bowls community came forward with proposals to save the MBC site and re-open the bowling club.

A new sports hall is 34.5m x 20m (1468m²). It requires as a minimum ancillary storage, changing, management and car parking provision to make it accessible to the local community. To ensure sustainability most sports halls offer health and fitness facilities e.g. weight and cardio rooms, spin and exercise studios. There is an existing supply of fitness facilities in this area. Without this revenue stream it is unlikely that a stand-alone community sports hall can be cost neutral. For examples, see Talacre Community Sports Centre and the feasibility work on the proposed new sports hall development at Kings Cross both of which clearly illustrate the financial issues surrounding revenue subsidies required to maintain non-education based community provision.

SLC concluded that Croftdown Road was, regardless of the availability of capital funding or a revenue subsidy, an unsuitable site on which to accommodate a community sports hall. KKP agree with this finding as did the previous Principal Planning Officer, Mr Markwell.

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Capital Investment

With regards to capital investment, Camden Borough is not in a position to invest capital funding into new sports hall provision on this site. The Council is facing severe budget cut backs and a requirement to save several millions of pounds.

Camden officers are currently negotiating to secure a new sports hall at Kings Cross and are in discussion with Sport England regarding capital funding. CBC does not consider that Sport England or the Sports Lottery Fund has grant aid available to purchase the MBC site and fund a new community sports hall, even if the site can accommodate the building mass and associated ancillary and car parking facilities.

For Sport England to state that capital cost is the only constraint to the development of a new sports hall on this site is to disregard the site requirements for such a large bulky facility and to have no regard to the long term sustainability of the management and upkeep of the building.

Site marketing for D2 Use

I am unaware of the situation re: site marketing.

Conclusions

Generator Group has, through SLC, undertaken extensive research to investigate the demand for sports uses of this site. To this end, the Group has undertaken an assessment, as required by Paragraph 74 of the NPPF to clearly demonstrate that the buildings and land occupied by the bowls facilities are surplus to requirements.

Furthermore, the loss resulting from the development will be replaced by a sustainable community tennis club, an area of public open space and play facilities in an area of open space and play deficiency.

The objection from Sport England is not consistent with the application of policy in other situations.

KKP would be pleased to meet with representatives of Camden Planning Department to further discuss this matter and the pre-application advice given to Mr Markwell on the approach to the assessment of need and the findings of the SLC report.

Yours sincerely


Sharon Bayton

CC Nigel Robinson – London Borough of Camden
CC Katy Walker – Sport England
CC Duncan Wood Allum - SLC

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