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(sent via email)

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Dear Mr Barnes

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

Thank you for explaining Generator's position at our meeting on 14th October 2015 regarding your application for Mansfield Bowls Club (MBC). As promised, I am writing to set out the Council's position.

Policy Context

Overall I consider your application meets the majority of the council's policies that apply to it and I hope very much that the remaining issue relating to the loss of existing sports/leisure facilities could also be resolved.

The most relevant policies in assessing the loss of existing sports/leisure facilities on site are Policy CS 10 'Supporting Community Facilities and Services' and Policy CS 15 'Protecting and improving our parks and open space and encouraging biodiversity' of the London Borough of Camden Local Development Framework Core Strategy and Policy DP15 'Community and Leisure Uses' of the London Borough of Camden Local Development Framework Development Policies.

Policy CS 10 states that "*the Council will work with partners to ensure community facilities and services are provided for communities including:*

d) providing a range of other community facilities to support Camden's growing population

The Council will:

f) support the retention and enhancement of existing community, leisure and cultural facilities and;

g) facilitate the efficient use of community facilities and provision of multi purpose community facilities that can provide a range of services to the community a single accessible location.

Policy CS 15 states that "*the Council will protect and improve Camden's parks and open space*".

The supporting text of Policy CS 15 states that the Council “*will seek to protect existing outdoor sport facilities*” and will “*encourage the improvement of existing facilities*” (para 15.16)

Policy DP15 states that:

The Council protect existing leisure facilities by resisting their loss unless;

e) adequate alternative facilities are already available in the area and therefore no shortfall in provision will be created by their loss; or

f) the leisure facility is no longer required and it can be demonstrated there is no demand of an alternative leisure use of the site that would be suitable.

The supporting text of the policy states that the Council is opposed to any reduction in the provision of leisure and sports facilities because of the contribution to quality of life and Camden’s cultural character. Where a replacement facility is to be provided the applicant should demonstrate to the Council’s satisfaction that the replacement facility is the same standard or better than the facilities to be lost.

Your Application

I note that your proposed scheme will result in the permanent loss of Class D2 sports facility, which is also designated as an Asset of Community Value (ACV). Therefore the policy presumption is to refuse permission on the basis of policies CS 10, CS15 and DP 15. The Council recognise that there has been a significant reduction in demand for the previous bowls use and there are alternative bowls facilities available in the vicinity of the site. The Council also recognise that many alternative uses identified by SLC in their Sport and Leisure report would not be suitable for this site and that those which are considered suitable may not be financially sustainable as a standalone facility with no enabling development elsewhere on the site. However the Council do not consider that the provision of a mixed use development which provides a sports/leisure facility as well as residential development on the site of the existing Clubhouse has been fully explored.

Furthermore given the nature of local concerns expressed, it appears that there is a significant level of demand for indoor sports provision in the area. This view is supported by Sport England in their consultation response; whilst not a statutory consultee, they are nevertheless the authoritative body on these matters. At present, officers do not consider the application complies with Policy DP15 (f) as it has not been demonstrated that there is no demand for an alternative leisure use that would be suitable.

Hence if the application is to go forward with a positive officer recommendation, this fundamental issue needs to be addressed. At the very least officers will need to be able to demonstrate that a mechanism can be put in place securing broadly equivalent replacement off site mitigation. As discussed at our meeting, it appears the only way this could be achieved would be through making a financial s106 contribution which could be applied to the provision or improvement of indoor sports facilities to be used by local residents in the area. This, alongside the expansion

and improvements to the existing outdoor tennis facilities on site which are offered as part of the application, would go some way towards recognising the need for indoor sports provision in the local area and the wider borough and mitigate the permanent loss of the indoor sports facility on site and hence at least in part address the fundamental policy objection.. This would also concord with the Council's emerging Health and Wellbeing Strategy 2015.

The starting point for calculating such a contribution must be the actual cost of providing such equivalent off site provision or improvement .Officers suggest a contribution of £600,000 is secured via s106 legal agreement. This could, for example, finance improvements to the existing sports hall at Highgate New Town Community Centre or the provision of a new sports hall or sports facilities as part of a comprehensive redevelopment and/or a proposed upgrade to the Talacre Sports Centre. Enhanced facilities on either site could reasonably be considered to serve the same local community.

I suggest this as a way of moving forward positively on your application but would welcome your views and how you wish to proceed so that a date for Development Control Committee can be agreed as soon as possible. I'm sure you'll appreciate this is an officer view and cannot be held to prejudice the formal determination of your planning application by the Local Planning Authority.

Yours sincerely

A handwritten signature in cursive script that reads "Frances Wheat".

Frances Wheat
Assistant Director Regeneration and Planning

CC David Churchill