

Kathryn Moran
Planning Officer
London Borough of Camden
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WC1H 9JE



10 June 2015

Dear Kathryn

App Ref: 2015/1444/P

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

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

Thank you for facilitating a meeting between Generator and their advisors, and Sport England in relation to their response letter of 12 May 2015 (Ref L/CA/2015/39665/N). This was confirmed by Sport England Principal Planning Manager Katy Walker to be a response in which Sport England was acting as a non-statutory consultee. It was confirmed that the application had been brought to their attention by residents and colleagues following the submission of the standard “no comment” response for applications in which Sport England is a non-statutory consultee on 14 April 2015.

Katy Walker advised that from the point of view of Sport England, they will always take a precautionary approach to any planning application which may result in the loss of playing fields, sports facilities and land and access to natural resources for sport. As such, their objection is based on a desire for further certainty that the planning authority is comfortable that the existing requirements for sporting provision are being met and positively planned for, with the result that the partial loss of D2 land on the Mansfield Bowling Club (MBC) site will not result in a shortage of D2 land / facilities within the borough.

It was also confirmed that Sport England felt the case for the loss of bowls was sound and not disputed, that the proposed scheme would benefit tennis provision in the borough and that Sport England had no issue with the approach taken or the robustness of the Sport and Leisure Report supporting Generator’s planning application.

In terms of their position in relation to responding to strategic needs and planned growth, London Borough of Camden confirmed the following:

- Pro-Active Camden (PAC) was established in 2007/8 as the Community Sport and Physical Activity Network for Camden with the involvement of a number of key strategic partners. The Steering Group has had an ongoing involvement in the identification of strategic needs and priorities. This was part of a national, regional and local network of similar strategic bodies;

- Two borough-wide needs assessments have been undertaken in the 7 years since its establishment to identify gaps in provision and inform targeted interventions – *Pro-Active Camden Needs Assessment for Sport and Physical Activity* (2009 – implemented 2010) and the *Pro-Active Camden Needs Analysis Sport & Physical Activity for Children and Young People* (2013 – implemented 2014) - enclosed;
- A need for Bowls has never been identified in Camden for any sector of the population, and did not register as a strategic need from either of these studies;
- An Indoor Built Facilities Strategy is currently being undertaken for the Council by Knight, Kavanagh & Page (appointed through Sport England’s procurement framework and who also undertook the independent review of the Sport and Leisure Report submitted with the application), with support from Sport England’s Relationship Manager - Facilities & Planning (Stuart Makepeace), who sits on the project Steering Group. This Strategy (which is in the final stages of completion and not yet public) aims to identify gaps in provision and areas of under provision within the borough and has produced a draft recommended action plan;
- These studies have confirmed that there is under-provision of publicly accessible sports hall facilities in Camden;
- On the basis of the above studies, Nigel Robinson (LB Camden, Head of Sport & Physical Activity) stated that a public sports hall facility on the MBC site does not form part of the current indoor facility strategy draft recommendations:
 - a) Because the capital investment in such a facility at this location is unlikely to meet the test of operational viability and sustainability, and
 - b) Because this would not be the optimal location in Camden for a new facility of this type, relative to other areas of the borough where under-provision and unmet need is arguably more marked.
- LB Camden confirmed they have a number of planned approaches to addressing this identified shortfall, including:
 - Kings Cross has been identified as a strategic priority for the development of new sports hall provision (4 court sports hall). It has been identified for the development of a sports hall for c. 2017, funded through the Kings Cross regeneration scheme. This would serve residents of Somers Town and St Pancras and Kings Cross wards, which are among the most deprived wards in the borough with higher than average levels of inactivity
 - On the basis of the recommendations of the KKP Indoor Built Facilities Strategy, LB Camden will be working with local schools that have sports halls with a view to increasing community access and use;
 - There are several schemes for the provision of sporting facilities in the pipeline at various stages. However details of these schemes are not as yet publically available.
- It should also be noted that Camden, as part of their Community Investment Programmes, are developing plans to secure the future provision of Highgate Newton Community and Fresh Youth Academy which is located c. 200m from the MBC site. From the recent public exhibition held on the 14th May 2015 we understand that the current proposal for the site includes a sports hall;
- Tennis has emerged as a priority sport for Camden from the needs assessments undertaken over recent years, and there is evidence of unmet demand for good quality and affordable tennis from PAC’s research. The MBC site is considered to be a significant opportunity for addressing this need through provision of improved courts and a self-sustaining, inclusive community club at MBC with player development pathways;
- It is the Head of Sport and Physical Activity’s view that in this regard he has yet to see a viable capital solution or one which would be sustainable in its own right which is better than that currently being proposed for the MBC site;

- This confirms that the strategic need for indoor sports facilities is being addressed by LB Camden, and that the MBC site is not seen as a viable or appropriate option for a sports hall now or in the future;

Sport England also raised a query about the marketing of the site and whether Council, community group and other e.g. educational providers etc. had been given the opportunity to consider the acquisition of the site at a fair market value for D2 use.

The site was marketed by virtue of the Asset of Community Value (ACV) process. The ACV process elicited an expression of interest, but no actual offer. Notice was served on the Council setting out the intention to sell the land on the 15th October 2013. This was subsequently confirmed by the Council as acceptable under the Localism Act. At this point no eligible community interest group came forward within the initial 6 week moratorium period and therefore the further 6 month moratorium was not triggered.

Sport England's letter also reproduces notes from a previous application (app ref: 2012/6593/P) wherein the development proposals were wholly different to those currently proposed, stating "it is unclear how the current scheme has changed so fundamentally, such that the principal of the development could now be considered acceptable given [the planning authority's response to the previous application]." For clarity, the current application, in contrast to the previous application:

- Does not propose the loss to development of land designated as open space;
- Accords with the advice of the Council in the informative placed on the previous refusal with regard to the location of development proposals within the footprint of the MBC building;
- Would not lead to a loss of protected land;
- Would result in significant benefits to residents in terms of health, sport, recreation and play by the opening up of private land for public use, the increase in land available for sports use and the extension of sporting facilities;
- Would not affect the open nature of the site; and
- Would not result in the loss of open space – much the opposite in fact – it would open the site up for access by the public.

In light of the above response, it is hoped that Sport England will reconsider their objection to the proposal. If you or Sport England would like any further information, please contact us.

Yours sincerely,



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Director

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