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E Mail: [REDACTED]

26/08/16

Dear Sir,

SUBMISSIONS TO THE PLANNING COMMITTEE RE MANSFIELD BOWLING  
CLUB PLANNING APPEALICATION  
Ref No APP/X5210/W/16/3153454

- 1) My family and I live at the above address which together with 1 Regency Lawn directly overlooks the bowling green. My son and I are also members of the Kenlyn Tennis Club and have been very active members of the tennis club for many years.
  
- 2) The recommendation is that there is no demand for the land other than for a limited tennis use of three Courts. I would respectfully disagree and comment that there is the possibility of out door recreational use in the form of tennis Courts, Cricket nets, a combined football and netball Court with a children's play area. This could be

funded by a small enabling development of up to three houses.

**THE LOSS OF OPEN SPACE**

- 3) It should be noted that this area has always been for sports use. Historically it was given for this purpose. Whilst the building itself may be regarded as a "brown field site" it has in fact always been for sporting use or an adjunct to sporting use as indeed would be a cricket pavilion or the car park adjacent to a cricket field. As such it should be used for or be in support of sporting purposes.
  
- 4) It should also be noted that the MBC building in it's entirety is to be built on so not only will this area be lost for sporting use so will much of the surrounding area which will be required for parking and for access further eating into the sporting use.
  
- 5) There are two local schools at the either end of Croftdown Road, La Saint Union and Brookfield. These schools could utilise this area for playing fields if they were able to acquire it for the price that it would be if planning permission for housing was not granted.

I would quote from planning policy as follows:

**CS15 - Protecting and improving our parks and open spaces and encouraging biodiversity**

The Council will protect and improve Camden's parks and open spaces. We will:

- a) protect open spaces designated in the open space schedule as shown on the proposals map, including our Metropolitan Open Land, and other suitable land of 400sqm or more on large estates with the potential to be used as open space.

Policy CS15 protects Camden's limited open space and seeks to secure additional open space as well as improvements to existing open spaces. Importantly, CS15 makes no provision for enabling development around which the applicant's case is weakly built.

The Camden Development Policies document states that the Camden's Open Space, Sport and Recreation Study 2004, and the needs assessment in Camden's Open Space Strategy, demonstrated that nowhere in Camden had a surplus in open space. The Camden Open Space, Sport and Recreation Study Update 2008 found that there was 20sqm of public open space per person in the borough, dropping to 17 sq m by 2026, taking into account projected population increases and assuming no additional public open space is provided. By building upon existing designated open spaces, as proposed under the current MBC application, this figure would be reduced further. The proposed development would have a cumulative effect given that no open space contribution is to be made for the new housing.

Policy DP31 helps to deliver the strategy set out in Core Strategy policy by giving further detail on how the Council will secure the provision and improvements to open space, sport and recreation facilities.

**Policy DP31 – 'Provision of, and improvements to, open space and outdoor sport and recreation facilities'** states that:

*'To ensure the quantity and quality of open space and outdoor sport and recreation facilities in Camden are increased and deficiencies and under provision are not made worse, the Council will only grant planning permission for development that is likely to lead to an increased use of public open space where an appropriate contribution to the supply of open space is made. Priority will be given to the provision of publicly accessible open space.'*

**Policy DP15 – Community and Leisure Uses**

*The Council will 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 the loss; or*

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

It is submitted that the Applicants have not provided an increase in the open space so DP31 has not been complied with. They have not made out that there is no leisure use for this area and indeed their previous planning application was based on a leisure use for the MBC building so is at odds with the present application.

#### THE HOUSING DEVELOPMENT

- 6) The proposed housing development is extremely intensive involving 21 units. Such housing is not in keeping with the area. It appears as a monolithic and ugly structure higher than the existing footprint. It's construction will also involve the removal of a very attractive tree at the rear of the garden of No 3 Regency Lawn.

#### THE THIN END OF THE WEDGE

- 7) If this application for intensive housing is granted it will be the thin end of the wedge. It will be difficult to justify a refusal to build similar housing on the other side of the club as that area consists of a grass area that was to be the third tennis court for Kenlyn originally and concrete parking areas.
- 8) The land in question is located on designated private open space. It is Camden Policy (See CS15) to resist in principle the loss of existing parks and open space. I quote from the 29/11/2010 pre-application report in respect of the 2010 application that : "In this context

the development of designated private open space is considered to be unacceptable in principle."

- 9) Mansfield's developers have refused to consider any option that did not involve intensive property development. The reason for this is that they are property developers not interested in any sporting use of the property. They are not interested in consultation and have deliberately timed this Appeal when many of the local objectors are on annual holiday.

**KENLYN TENNIS CLUB**

- 10) Kenlyn's position has changed since the original application. It was proposed that Kenlyn would be protected by an appropriate S106 proposal to be negotiated. This was a ridiculous position as once planning had been granted no S106 agreement could have been argued for. Kenlyn's current position is that, whilst of course they would welcome the construction of three courts and a pavilion for the club use and for the community to benefit there from, they now do not agree that the land should be used for housing.
- 11) As regards the housing, the provision for parking is totally inadequate and the pressure of the extra parking in the road for all the cars will create intense pressure on local residents.

Dated 26/08/16

Justin and Wendy Shale.

