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**Contact:** Jonathan Markwell  
**Direct Line:** 020 7974 2453  
**Email:** [Jonathan.Markwell@camden.gov.uk](mailto:Jonathan.Markwell@camden.gov.uk)

**Development Management  
Planning Services**  
London Borough of Camden  
Town Hall  
Argyle Street  
London WC1H 8ND

Tel 020 7974 4444  
Fax 020 7974 1975  
[planning@camden.gov.uk](mailto:planning@camden.gov.uk)  
[www.camden.gov.uk/planning](http://www.camden.gov.uk/planning)

Ian Mayhead  
Associate  
Iceni Projects Limited  
Flitcroft House  
114–116 Charing Cross Road  
WC2H 0JR

Dear Ian Mayhead

Planning Pre-application advice meeting note

Reference: 2013/6780/PRE

Planning enquiry regarding: Mansfield Bowling Club, Croftdown Road, London, NW5 1EP

A Pre application overarching advice/meeting was held on 21<sup>st</sup> November, to detail:

- *Initial discussions regarding possible alternative options for a future application at the site;*
- *Reviewing consultation event responses.*

This meeting followed an earlier meeting held on 13/08/2013 (ref: 2013/4725/PRE), which itself followed the refusal of planning application 2012/6593/P at the site on 05/07/2013. This advice should be read in conjunction with the previous pre-application advice and that from the previously refused application.

This meeting was attended by:

- Stuart Minty (Development Management Team Manager - East Area)
- Jonathan Markwell (Principal Planning Officer, Development Management East Area)
- James Barnes (Generator);
- Adam Leach (Generator);
- Ben Williamson (PRP);
- David Churchill (Iceni); and
- Ian Mayhead (Iceni).

At the meeting PRP presented more detailed options for the site. More specifically, on the northern part of the site (existing two tennis courts, clubhouse, disused bowling green), all designated Private Open Space, five options were put forward. These are summarised as follows:

1. 2 upgraded (LTA compliant) tennis courts, replacement clubhouse, open space with pedestrian access from Croftdown Road, landscaping.

2. 3 upgraded (LTA compliant) tennis courts, replacement clubhouse, community garden (obviously smaller than option 1) with pedestrian access from Croftdown Road, landscaping.
3. 2 upgraded (LTA compliant) tennis courts, replacement clubhouse, MUGA suitable for football, netball, basketball and tennis, pedestrian access from Croftdown Road, landscaping.
4. 2 upgraded (LTA compliant) tennis courts, replacement clubhouse, pocket park, 2 petanque courts, pedestrian access from Croftdown Road, landscaping.
5. Same as 4 but with children play space and community gardens also included within the pocket park

On the southern part of the site (existing MBC building, car parking and grass/landscaping), all designated Private Open Space except the existing MBC building, four options are put forward. These are summarised as follows:

1. and 2. build residential units (mix of apartments and houses) on the existing footprint of the MBC building, with parking and landscaping in the remaining areas.
3. and 4. instead of following the footprint of the existing building, take cues from the prevailing urban grain to form a central open space (which would be publicly accessible) with residential units surrounding this.

Subsequent to the meeting the local planning authority has discussed the proposals with a number of internal colleagues in order to provide an informed initial response.

## Advice

### The northern part of the site

In general terms, the use of this part of the site for publicly accessible open space is broadly welcomed. It is likely that officers would seek for the space to become publicly designated open space, and for this to be re-designated accordingly. This would represent a public benefit of the proposal, in comparison with the existing private open space designation.

The provision of a new pedestrian access from Croftdown Road is generally welcomed and is unlikely to be contentious, providing it is solely for pedestrians and is satisfactorily controlled / managed. Details in these regards should be finalised prior to any submission, in order to reduce the potential harm to amenity of nearby occupiers (e.g. noise and disturbance / crime and anti-social behaviour).

In respect of the re-provision and upgrade of tennis courts, this is again generally welcomed. Input from Nigel Robinson (Head of Sport & Physical Activity) advises that the optimal size for a community club facility (as defined by the LTA) would be four courts and a clubhouse. Nigel advises that the business model would be challenging in this regard, but with a suitable management vehicle (e.g. a charitable or community organisation) such a format could work.

In addition, given the previous proposal sought to remove the existing tennis courts from the site, and provided evidence to demonstrate there was no demand for such a

use, a careful narrative for any proposal which now seeks to retain and enhance tennis facilities at the site is required. At the meeting you detailed that there has been a recent growth in membership and that the club now employs a qualified coach. Hence it would appear that you are seeking to work alongside Kenlyn Lawn Tennis Club in any future proposal at the site. However, commentary/evidence to illustrate the intentions and rationale behind this element of the proposals will be required.

At the present time there are however unanswered questions concerning the management of the tennis courts and, in particular, how publicly accessible they will be? Such matters will need to be addressed in full at the time of any future application. Are they proposed to be run by Kenlyn Tennis Club, with public hire facilities at certain times? Or would it be publicly managed, with Kenlyn Tennis Club having a regular slot? The precise arrangements in this regard would need to be addressed prior to submission to help demonstrate the case for this use at the site.

Other comments made via Nigel Robinson include the potential for floodlighting. This would improve the potential for maximising use / revenue of a tennis facility, but may lead to amenity concerns in the locality. Another use matter to consider is whether the courts would be sought to be covered in any way (e.g. a canopy or 'bubble' type structure like there is in Islington)?

Given the management / amenity uncertainties, it is considered that a smaller tennis facility (2 rather than 3 or 4 courts) may be a more appropriate option. This would also allow space for other uses on the northern part of the site aside from tennis.

As such, the greater flexibility of the space as a whole is one option to be considered further. In this regard the provision of a pocket park may be one idea to consider further, with the amount of 'green usable space' maximised. The inclusion of a play area, community garden and/or petanque, are all possible options to explore further.

In respect of the MUGA option, it is considered that such a facility has the potential to be incorporated, but in comparison with the other options would potentially lead to nearby amenity issues. If you were to continue to explore this option, a clear demand would need to be shown, together with the intended measures to protect nearby amenity. Along similar lines, Nigel Robinson has suggested that an activity for which there is strong need/demand in the borough for is a BMX facility. However, the size of the space, together with the potential amenity implications, may rule such an option out. It is however a suggestion to consider.

Another issue to consider with any sporting element on the site is the transport implications such a use would have. In particular, the need to ensure a specific use would not cause harm to parking conditions in the vicinity of the site (and consequential highway / pedestrian safety / congestion concerns) would need to be demonstrated, particularly given that on-site parking would be reduced / removed.

The provision of a replacement clubhouse for the tennis club is likely to be considered appropriate, given it would be ancillary to the main use and for which there is likely to be a demonstrable need. Details as to the size (including the volume) of the replacement clubhouse, in comparison with existing, would need to be provided. It is also commented that the long term viability of the open space could be improved by the clubhouse having a wider role – e.g. toilet / changing facilities for the

rest of the space perhaps? Again, thought would need to be provided as to the management of such a space.

Notwithstanding the above, it is considered that the engagement of the local community and seeking to gain a consensus (as far as possible) as to what the local community wish for this part of the site to be used for is required. To make any space successful in the long term, there is a need for community 'buy-in'. As such, you are strongly encouraged to undertake further detailed engagement with local groups / residents to ascertain proposed uses. This is particular the case owing to the 'asset of community value' designation at the site.

As in the previous application at the site, the local planning authority would seek for a phasing plan to ensure that the elements on the northern half of the site are ready for use prior to the first occupation of any residential unit. This would be to ensure that the permission is not only partially implemented, with such a matter secured via s106 Legal Agreement.

In overall terms, there is considered to be potential for a number of publicly assessable uses to be incorporated on this part of the site. Further guidance based on the thoughts of local groups / residents should assist in guiding this process.

#### The southern part of the site

It is first noted that all proposals for this part of the site no longer seek to retain the Mansfield Bowling Club building. In order to justify such a loss (of an existing leisure facility) in policy terms, it is considered that the proposals would need to comply with both policies DP15e and DP15f of the LDF. The need to provide commentary / evidence in respect of both parts of the policy is partly owing to the asset of community value designation on the site. It is recommended that the commentary / evidence will need to be robust in these regards. The level of detail required should not be underestimated on your part. From a design/conservation perspective, as you are aware the building is identified as making a negative contribution to the character and appearance of the conservation area. Hence, there is no in-principle issue with the demolition of the building from a design/conservation perspective.

Should the above be considered satisfactory, then the principle of providing residential accommodation would be likely to be welcomed, aligning with CS6 and DP2 – housing is the priority land use of the LDF. However, any such proposal at the site would also need to be considered within the context of policy CS15. As you are already fully aware, the entirety of the site barring the existing building is designated Private Open Space. As such, the potentially least policy contentious proposal would involve including residential development solely on the footprint of the existing building (options 1 and 2). However, you have also put forward two further options which go beyond the footprint. In this regard you have specified the opportunities such an alternative approach would enable, namely:

- better reflecting the urban grain;
- creating a larger more central open space;
- create rear garden security with back to back gardens
- maximise views over the open space

(as specified within the PRP presentation dated 21/11/2013)

Officers consider that the options put forward which go beyond the existing footprint would potentially represent a more comprehensive solution to the site from a number of perspectives. For example, it is considered that options 1 and 2 would result in inefficient layouts of the parking spaces, landscaping and open space. Thus options 3 and 4 propose a more integrated layout and approach, but would include development on private open space. It is however considered that a case may be able to be made and be supported for such an approach. As such, you are advised that there would be benefits in exploring such options (which go beyond the existing footprint) further. Simultaneously, it must also be recognised that such an approach would potentially require a far greater level of information / evidence to be submitted to seek to accord with the general thrust of policy.

With regard to officers initial thoughts on options 3 and 4 specifically, it is offered that option 3 is likely to be considered more favourably than option 4, by linking in with the northern part of the site more comfortably, thereby assisting in maintaining the wholeness, appearance and setting of the open space. In taking any proposals forward officers would seek for any proposal to:

- Maximise the size of the central open space
- Seek to re-designate the central open space as public open space
- Potentially provide a link from the central open space to the open space on the northern part of the site.
- Minimise the number / footprint / extent of residential units that are required (to facilitate a viable development of the entire site) in order to maximise the size of the central open space
- Minimise the size of the front / rear garden spaces shown in order to maximise the size of the central open space. Regarding front gardens, it is considered that these should be minimised as far as possible. At the rear, small shortfalls in the typical 18m distances buildings may be able to be taken into account.
- The rear garden spaces are likely to be sought to be retained as designated private open space.
- Minimise the extent of highways / vehicular access / parking across this part of the site (in order to maximise the extent of public open space) – ideally the development should be car-free, but if proposed, space should be minimised.
- Depending on the number of residential units / floorspace involved, a contribution to affordable housing would be required. In line with CS6 and DP3, the strong expectation would be for affordable housing to be provided on-site, and there appears no apparent reason why this should not be the case.
- Provide detailed quantitative information including:
  - o The extent of any development on designated private open space.
  - o The extent of the residential development (taking into account paragraphs 6.19 – 6.23 of the officer report for the previously refused application, in order to assist with calculating this area)

In addition, it is advised that a full quantitative and qualitative assessment of the proposals will need to be put forward by you in any application submission. This is in order for officers to consider the proposals against the relevant local LDF policies and guidance, the London Plan, and the NPPF. The officer report for the previous application did this in detail within the assessment section. It is advised that explicit

and detailed information / evidence will be required in respect of each and every element of policy.

In overall terms it is considered that, should the principle of residential development be able to be established at this part of the site, out of the four options put forward that option 3 potentially provides the most suitable approach. This is however only on the basis of the information put forward at this juncture, and is provided without the benefit of the consideration of detailed matters. This includes the design approach, density, mix, affordable housing, quality of accommodation, lifetime homes, waste and recycling, parking, trees/landscaping, sustainability and amenity for example. Hence, further pre-application discussions should be entered into prior to any submission of an application.

### Next steps

At the time of the previous planning application there was significant public interest in the proposals. This is also very likely to be the case in any forthcoming proposal at the site. As such it is considered essential, in line with paragraphs 188-189 of the NPPF, that you fully engage the local community, both individuals and local groups and organisations, in advance of any application. It is acknowledged that one such overarching event has already taken place. It is advised that this should be the first in a series of such events. You are advised that further focused discussions should be held prior to progressing any scheme further in order to further gauge local aspirations for the site. Thereafter it is advised that you may wish to consider undertaking a further exhibition or similar event detailing your intended proposals for the site (and demonstrate how these relate to the public consultation responses received to date).

After this stage you are strongly advised to enter into further formal pre-application discussions with the local planning authority, by which time the proposals will have been progressed with the benefit of further input from public consultation and more detailed matters will be able to be discussed. Please see the following link for more information in this regard:

<http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/pre-planning-application-advice/>

After these steps a further measure you may wish to consider is undertaking a Development Management Forum. Officers however consider that this would be most appropriate should the proposals have been progressed to such a stage that all matters in the refused application have been sought to have been addressed, and the views of public consultation and the local planning authority have at least been attempted to have been taken on-board in your proposals. Please see below a link regarding more information concerning DM Forums:

<http://www.camden.gov.uk/ccm/content/environment/planning-and-built-environment/two/major-developments/development-management-forum.en>

Further to this you may also wish to consider undertaking a Developers Briefing. It is decided by the Chair of the Development Control Committee whether this would be applicable for this site or not (in due course). Please see attached a note for more information in this regard.

In addition, you are encouraged to enter into a pre-application PPA with the local planning authority. A separate PPA would then be able to be progressed at application stage should you wish to. Please see the following links for more information concerning PPAs.

Pages 13-14 of the following link: [www.camden.gov.uk/ccm/cms-service/download/asset/?asset\\_id=2618806](http://www.camden.gov.uk/ccm/cms-service/download/asset/?asset_id=2618806)

Apply for a PPA via:  
<http://www.camden.gov.uk/ccm/navigation/environment/planning-and-built-environment/planning-applications/pre-planning-application-advice/>

As a guide you are advised to engage all individuals who responded to the previous planning application, and those you have engaged subsequent to this.

In addition, I also attach a number of recent PPAs for your information. It would be expected for you to produce a first draft of the PPA for comment by the local planning authority.

#### Concluding comments

The local planning authority considers that the intended proposals represent a significant improvement when compared with the previously refused planning application at the site. It is considered that further discussions regarding the exact proposed uses on the northern part of the site are continued with both the local community and the Council prior to any submission. In respect of the southern part of the site, it is considered that the proposal which goes beyond the footprint of the existing building has a number of potential benefits over any scheme which follows the existing footprint. However, such an approach will present a more complex policy justification. Again, further discussions with the local community and local planning authority should be entered into prior to any submission.

**This document represents the Council's initial view of your proposals based on the information available to us at this stage. It should not be interpreted as formal confirmation that your application will be acceptable nor can it be held to prejudice formal determination of any planning application we receive from you on this proposal.**

Please note that if you (the applicant or their representative) have drafted any notes of the pre-application meeting(s) held with the council you cannot assume that these are agreed unless you have received written confirmation of this from the case officer.

If you have any queries about the above letter please do not hesitate to contact **Jonathan Markwell** on **020 7974 2453**.

Thank you for using Camden's pre-application advice service.

Yours sincerely

(sent via email)

Jonathan Markwell (Principal Planning Officer, Development Management East Area)