**London Borough of Hounslow Planning Application P/2020/3080**

**Planning Reference 00885/A/P21**

The Friends of Gunnersbury Park and Museum wish to record their opposition to this planning application.

a) We agreed with the reasons for rejection in the decision notice after the first application, and we have found no evidence in the second application which challenges that.

b) The presentation of the club as a long-term failure and not fit to be the occupier of the site is a mis-reading of its position.

We provide below an account to support the statement in the Delegated Report on the first application that insufficient evidence has been received to demonstrate that the facility has been vacant or *significantly* underused for a continuous period of 18 months.

c) We believe that the formal objectives set out in the formation of the Community Interest Company require it to find ways to support the bowls club through its period of difficulty, and we wish to challenge the CIC’s tone of blame for failure which is reported in the text of the planning application.

We provide below a copy of those formal objectives.

d) Merely listing alternative bowls clubs is not sufficient evidence that the Gunnersbury site is no longer required.

No marketing evidence has been produced to show an over-riding need for the proposed use. The applicant already operates three sites in west and south-west London, one close by in Acton, so it may be equivalently asserted that there is already plenty of opportunity for people who wish to use those facilities to able to do so easily.

No evidence has been produced to show consideration of any other uses.

e) We submit that there are other issues with this application which should lead to its rejection.

**b) The presentation of the club as a long term failure**

The records do not show this.

In 2009 the Options Appraisal for the restoration of the estate reported:

*The Bowls Club is let to Gunnersbury Park Bowls Club founded in 1931. Approximately 10 years ago the club took responsibility for the upkeep of the green and building. A team of six volunteers keep the green to a high standard and have carried out redecoration of the clubhouse including a new kitchen.*

It also reported that there had been a long-term decline in the use of the football facilities. It also noted that this decline had been accelerated by the arson of the changing rooms in 2002. Despite the amateur game being still in decline, football has been massively supported by the building of the sports hub and the laying out of pitches.

In 2015 the Sports Hub Consultation response to a question about the club recorded:

*a. The location of the bowls club and its green is seen as a positive to the scheme in terms of development of the club, membership and participation. For example use of the sports hall for indoor short matt bowls and general increase in footfall to the site. The councils have met with the bowls club committee and will continue to work together in developing these proposals.*

It went on to show how concern for the impact of shading and wind had been factored into the plans.

The principles then declared for the sport in the park were:

*All ages and abilities; Partnership Delivery; Multisport opportunities; and Community Involvement*

These principles support the claim of the Bowls club to continue in existence.

Two other promises were made during the long consultation process. The golf course and pitch and putt, then in the centre of the park, was not being closed but was going to be moved to a new site – probably the area behind the Popes Lane houses. And there would be free exercise opportunities installed within the park (such as a trim trail) with special emphasis on facilities for older people. Neither of the pledges has materialised.

In 2016 a report to the Project Board stated that there was no tenancy agreement, but that previously the Bowls club had paid bills and maintenance for a rent free agreement. Also that the club were not in a viable or financially stable position to take out a paid-for lease and that options under consideration included a management agreement.

A further report in 2017 states that the Bowls club has a full repairing lease one year on either side (Value Nil), that there were no plans to change these lease arrangements, and that the Bowls club needed to be integrated into the sports hub proposals.

The evidence suggests that at least up to 2017 the two Councils were happy to continue to support the Bowls club.

Item 2.2 (a) of the Communities Facilities Statement reports part of a letter from David Bowler of the CIC to the applicants:

*Membership at September 2019 was reported by the committee as 22 players. The club has a history of low membership and irregular occupation of the green and pavilion. At the commencement of the CIC’s management of the park on 1 May 2018, the club were already in a long standing dispute with LB Hounslow as the council was insisting that the club take on a full repairing lease of the pavilion, but the club protested that membership and therefore income from membership subscriptions was too low to take on such responsibilities….”*

This statement must be mistaken in its claim of a *long-standing* dispute.

Between 2017 and 2018 the attitude toward the Bowls club seems to have changed.

There may be two reasons. An exercise was under way to aggregate all the leases, licences, permissions to operate, termination dates etc, which would be part of the handover to the CIC and the basis for future rent negotiations, which would help to secure the financial future of the CIC.

At the same time serious financial difficulties in the restoration project were starting to become visible, at least to the Project Board. Turner and Townsend were hired to get a grip on the finances, refine the risks to the project and conduct rigorous Value Engineering exercises. The never-very-reliable business plan was falling apart and yet the Board was about to create a new Community Interest Company.

Staff at L B Ealing had already worked with Putt in the Park in Acton, and knew that company was interested in expanding. This may explain why – to the best of our knowledge - no marketing exercise was conducted to evaluate other uses.

The financial appeal of Putt in the Park was increased when the CIC rejected the first version of the Go Ape proposals. That scheme had been badly launched, and serious doubts had emerged about the financial arrangements and the impact on the Park. This episode cannot be used to justify putting financial pressure on the Bowls club to compensate for an imagined loss.

The area around the club has been a building site for far too long, and the interminable delays with the Sports Hub completion also blighted the club’s chance to benefit from the revival of sport in the Park.

They were set an impossible task. A Bowls club that was expecting to be part of the future of the estate was put on very short notice to get more members and agree to a new lease to cover a new rental payment as well as full repair. It is hardly surprising that it cracked under pressure.

It is wrong to treat the club with contempt for failing to meet the CIC’s requirements. In the view of the Friends, the Bowls club deserved support from the CIC to gather the expertise to help it to move forward and play its part in the future of the estate.

**c)** **The formal objectives of the CIC:**

In particular:

*b.to operate and enhance the provision of both indoor and outdoor facilities in Gunnersbury Park in the interests of social welfare for recreation or other leisure time occupation of individuals who have need of such by reason of their youth, age, infirmity or disability, financial hardship or social circumstances or for the public at large with the object of improving their conditions of life;*

*c. to operate, provide or assist in the provision of community facilities to be available to all sections of the community without distinction, including use of meetings, lectures and classes and/or forms of recreation and leisure time occupation with the object of improving the conditions of life for all those who use the facilities on the Gunnersbury Estate.*

The analysis of the “old” sports facilities at Gunnersbury was that they represented a huge public subsidy for one section of the community – young men. The “new” facilities were required to enable opportunities to be offered to a wider range of users – in gender, age and ethnicity – but from the sports which have been supported through the layout of the pitches and other facilities (like the tennis courts) they will mainly be attractive to people who want and are able to engage in vigorous activity. Bowls is characterised as a sport for the elderly, but is perhaps more accurate to consider it as a sport for people who want or need exercise but not vigorous exercise, along with companionship and the development of skill. If it is a good facility which extends the range of sports on offer at Gunnersbury and if it is popular mostly with the elderly, then that should be celebrated.

**e) Other issues**:

1) **The massing of attractions close to the car park**. One of the long-standing problems with the estate is that on hot, dry, summer days, especially weekends and school holidays, the congestion between the Car Park and the Round Pond can be uncomfortable, unpleasant and occasionally dangerous. It has long been an ambition to encourage park users to make full use of much more of the grounds, to alleviate pressure and to improve general feelings of security. It is unwise to install Putt in the Park by the car park, especially as it is marketed as a family games attraction so likely to be most popular at times of maximum congestion.

2) **An extra café**. The Sports Hub was designed to include a café and bar and may have one in the future. There is a disused café at the further end of the children’s playground. The pop-up refreshments since the main café was destroyed have been successful and attractive and could meet the need next summer in offering service around the park. There is no evidence from Putt in the Park’s tariff of charges that profits from catering are used to subsidise playing fees – it is simply another income stream. Has the CIC really thought this through?

3) **The bat surveys**. As part of the restoration project and the introduction of sports pitch floodlighting, Gunnersbury had two bat surveys (2014 and 2015) which reported on the importance of the bat route through the park from the Pope’s Lane entrance tree plantation along the treelines to the Potomac, and how these would be disrupted by floodlighting. This knowledge was taken into account in subsequent design work. The applicant’s floodlighting proposals have taken no account of the responsibility to work within the park’s designation as a Site of Borough Importance for Nature Conservation.

4) **Changes to the landscape**. The application concentrates on proposals for changes to the building and neglects to make the case for changes to the landscape. The layout of Putt in the Park in its existing venues shows a cluttered landscape of lighting, fencing, paths, hard landscaping, rocks and artificial turf. At Gunnersbury it will add a poorly-designed entrance gate that shows no acknowledgement of its context. The first experience car-borne visitors will have of the Grade II\* listed park and conservation area is of a jumbled, twee, expensive playground, completely out of place in its landscape. Surely Gunnersbury deserves better than that.