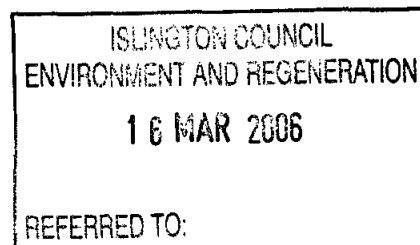


10 March 2006

Ruth Waistall
DP9 Planning Consultants
Cassini House
57-59 St James Street
London
SW1A 1LD



Dear Ruth

Ref: Lambs Action Team – Response to their Summary Objections

I write in response to a number of points raised by the Lambs Action Team (LAT) at the Committee Meeting of 24th February 2006, in relation to the planning application submitted by Clan Real Estate (Lambs Club) Limited. For ease I have cross referenced my comments with the appropriate paragraph numbers encompassed within the LAT note, which was distributed at Committee. I attach a copy of the note for ease of reference.

- ref para 6** – I have prepared a PPG17 Summary Report which was submitted to the Council on 28th February 2006 and considers: the nature and scale of squash use at Lambs Club; the profile of members; trends in membership numbers; and the existing supply of other clubs (with squash and health and fitness facilities), within a catchment of 10-15 minutes, together with the available membership capacity at these clubs. On the basis of this research and analysis, I conclude that Lambs Club is surplus to requirements.

Further, based on my analysis of the membership, it is clear that it is predominantly made up of weekday workers in the area (approx 94%), and therefore the membership could not be considered to be representative of the wider community.
- ref para 7** – This is a broad policy statement which does not apply to the current situation at Lambs. Islington Council, in its Greenspace and Leisure Division Strategy, makes no mention of the need for more, or the replacement of, existing squash courts.
- ref para 8a** – Lambs Squash Club is a niche, specialist facility. Access to its facilities is a relevant consideration particularly in the light of the Council's stated policy to encourage access to its leisure facilities for those within the community that could be considered socially or economically disadvantaged.
- ref para 8b** – In addition to the foregoing, I would re-iterate that workers/the corporate sector represent the majority use. Members living within the EC1, EC2 and EC4 postcode areas account in total for only approximately 6% of the total membership. Further, the Council (as part of their assessment of the planning application) recognised the niche nature of the facility and the fact that its usage is unrepresentative of the wider Islington Community.

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5. **ref para 8c** - The sustainability of the club is a material consideration. Lambs Club membership now stands at 1,100 confirming an on-going steady decline with membership attrition rates greater than new members joining. Of the total membership, in the order of 400 are active squash members, as confirmed through an analysis of the club's booking sheets. Independent research outlined both within my first report and subsequent PPG17 report confirms the decline of participation in squash, since the mid '80s. Indeed, England Squash's own facility strategy (the National Facilities Strategy for Squash in England 2000-2005), confirms this very point.
6. **ref para 8d** – Disability Discrimination Act (DDA) legislation is relevant to the continuing operation of any facility and is therefore a consideration in this case. No independent assessment is necessary as the issues both in terms of DDA and general property repair/maintenance are self-evident. Given the club's closure not later than the expiry of the current lease i.e. 28th September 2007 – major investment would be uneconomic at this stage.
7. **ref para 9** – Lambs Squash Club membership continues to decline and now stands at 1,100. As stated previously (based on information provided by the Club Management), of these, only 400 could be considered as 'regular' squash players. We have demonstrated through our research that a minimum of 400 memberships are available locally at alternative facilities (e.g. Slim Jims and Champneys). In terms of peak availability, it is clearly uneconomic to develop any sports facilities to satisfy demand at peak times. Indeed, market factors characterising 'peak periods' are changing e.g. greater flexibility of working hours.

We acknowledge that the Lambs Club caters for players of different standards, operating leagues and ladders, as do a number of other clubs in the area. Further, as we understand it, only Peter Nichol, at an elite level, occasionally trains at Lambs, free of charge – this ad hoc usage could be accommodated at other clubs within the Fitness Exchange Group.
8. **ref para 9** - Lambs may have been the "Wimbledon of Squash" in its heyday but not any longer. It is not mentioned in the National Facilities Strategy for Squash in England 2000-2005. Equally, squash will not feature in the 2012 Olympics and I would suggest that the focus of sports facility provision will be on the sports that will feature in the 2012 Olympics.

Finally, I would suggest that the 635 objections comprise mainly the corporate membership base (previously referred to), rather than the wider community. Given the availability of alternative facilities, Lambs Club is considered to be surplus to requirements and therefore does not conflict with PPG17 – the main point of the LAT note.

I do hope the foregoing is helpful.

Yours sincerely

Eileen Hinson
Director

Appendix: Lambs Action Team note

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LAMBS ACTION TEAM - SUMMARY OBJECTIONS TO APPLICATION P052310

Background

1. This is second application by Clan which seeks to address the six grounds for the refusal of the first. The application has been reviewed by a different planning officer whose recommendations state that all six grounds have been adequately addressed.
2. We believe that there are two key reasons why this planning application should be refused:
 - (a) the planning officer's reasons for concluding that ground 6 is adequately addressed are wrong; and
 - (b) there are sustainable and reasonable grounds under applicable planning policy for refusing the planning application, because of the sporting use of the site.

Planning Policy Framework

3. Ground 6, an independent ground for refusal of the planning application, relates to the current use of the site as a sports facility.
4. The relevant planning policy is contained in the Council's UDP (R17, R18 and R23 in particular) as supplemented by PPG17 and 3D.5 of the London Plan.
5. R17 supports the provision of additional facilities for indoor sports and R18 enables the Council to seek agreements with private sector developers to provide suitably located sports facilities. R23, although not referred to by the planning officer, states that planning permission will not normally be granted where it would involve the loss of public entertainment or sites of cultural value.
6. PPG17 requires the Council to provide or maintain an adequate supply of sports and recreational facilities by:
 - (a) refusing planning permission to redevelop a sporting facility unless it is proven to be surplus to requirements;
 - (b) addressing the needs of residents and those visiting the area, including the workforce; and
 - (c) undertaking a robust assessment of local needs.
7. Policy 3D.5 of the London Plan states that boroughs should identify sites for a range of sports facilities to meet local, sub-regional and wider needs.

Planning Officer's Arguments

8. The planning officer reviewed ground 6 in light of the Pan-Leisure report (commissioned by the applicant) and concluded that the ground was "adequately addressed". We believe his conclusions are materially incorrect for the following reasons:
 - (a) Private members' club and no junior provision:
 - whether a club is private or not is irrelevant to applicable planning policy;
 - Lambs is only private in that it charges a fee, as do all clubs in the area. It does not restrict membership in any pejorative sense;
 - Council recognises the need to work with private institutions in provision of leisure facilities;
 - whether provision for juniors is a planning policy goal or not, failure to do so currently is not a reason for redeveloping the facility.

- (b) Predominately serves corporate sector:
- the Council's UDP does in fact consider the use made by workers of facilities in the borough during the working week;
 - PPG17 requires the Council to consider "those visiting the area, including the workforce"; and
 - the reference to EC1 is misleading as Islington covers a larger area, including EC1, EC2, E8, N1, N4, N5, N6, N7, N8, N16, N19, NW5 and WC1.
- (c) Decline in membership and profits:
- neither a decline in membership or in profits is relevant to planning policy (unless the facility is in complete disuse);
 - in fact Lambs has nearly 1200 active members; a further 90 members joined in December 2005; and
 - Sport England and England Squash have corrected Pan-Leisure's statements that squash is in decline.
- (d) Disability Discrimination Act requirements:
- the requirements of the DDA are not relevant to planning applications;
 - the DDA has its own enforcement mechanism and Lambs would have to be assessed properly for DDA compliance (it has not been); and
 - the cost estimate for compliance is an unsubstantiated guess.

Lambs and planning policy

9. The Lambs sporting facility is not surplus to requirements for the following reasons:
- (a) Nearly 1200 members and 9 courts – at peak demand times, at lunch and after work, these are used for several hours a day.
 - (b) Neighbouring facilities cannot possibly accommodate this usage, since they have fewer courts and are also busy at peak times.
 - (c) Lambs is a centre for excellence, supporting players at all levels and of all genders, with a critical mass of players that cannot be housed in a single facility elsewhere.
 - (d) Lambs maintains an active internal ladder and has men's and women's teams that participate in regional and national leagues.
 - (e) Lambs is regularly used as the London training base for several of the country's and the world's top players.
 - (f) Lambs is the "Wimbledon of squash" and has national and international importance, which is of added significance in light of the 2012 Olympic Games and the emphasis placed on these in the London Plan.
 - (g) Large gym and fitness studio facilities which cater for a number of sports, including being the centre for Shidokan karate in London.
10. As can be seen from the 635 objections to this application, Lambs is supported by local residents and workers. Its redevelopment would be contrary to planning policy and a great loss to Islington and the wider community.
11. **We believe that these are sustainable and reasonable grounds for refusing the planning application.**

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