

PLANNING SUPPORT AND EVIDENCE OF VERY SPECIAL CIRCUMSTANCES FEB 2021

A REPORT FOR PLANNING APPROVAL OF THE RENEWAL PROJECT FOR MARBLE HILL
PLAYCENTRES FACILITIES

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With Marble Hill Community Project (MHCP)

- 1.0 Introduction
- 2.0 Executive Summary
- 3.0 Planning Policy Position
- 4.0 Grounds for Consideration for "Very Special Circumstances"
- 5.0 Current Condition of Facilities
- 6.0 Option Appraisal
- 7.0 Building Options
- 8.0 Proposed Use of the New Build
- 9.0 The Proposals: Minimum Space Required
- 10.0 Outweighed Harm to Metropolitan Open Space
- 11.0 Visual Impact Assessment
- 12.0 No Effect on the Sky Line
- 13.0 No Loss or Harm to Heritage
- 14.0 Appropriate to Environmental Policy
- 15.0 Benefits Outweigh Limited Harm
- 16.0 Additional Very Special Circumstances
- 17.0 Supporting Documents

1.0 INTRODUCTION

- 1.1 The project is supported by English Heritage (under licence from Historic England). See Letters of Support at Appendices 39 - 40. Note the renewal project relating to the rest of Marble Hill Park and House obtained planning approval under 18/2977/FUL in December 2018. The Playcentre proposals are complimentary to all the environmental proposals and management of the Park.
- 1.2 Marble Hill Playcentres is a charity providing baby, child, young adult and parent support by nursery care and older children activity. It plans to renew dilapidated buildings that are at end of life and unfit for purpose and create a family community hub, welcoming two other local charities specialising in Special Educational Needs and Disability (SEND).
- 1.3 The hub will provide an adapted, sustainable and secure home for three much loved and needed local charities. Besides meeting rising and desperate need for general child facilities and retaining free access to these facilities for low-income families, the new hub will have a particular emphasis on meeting the needs of children with SEND and their families. Working together efficiently, the three charities will be able to provide much more to the community through co-ordination and collaboration with each other and other local organisations. The new facilities will meet new regulations and licensing requirements and cater for cognitive, behavioural and physical disabilities, in a highly sustainable building which is truly inclusive for all of the community. It will offer music and art therapy and nurture social and motor skills as well as mental health. A hallmark of the building will be its emphasis on health for children and families and the opportunity it presents to educate and inspire the next generation to protect the environment.
- 1.4 English Heritage is the landowner and is supportive of the application (see Letters at Appendices 39, 40)

2.0 EXECUTIVE SUMMARY

- 2.1 The proposals satisfy the criteria of NPPF and London Plan regarding Very Special Circumstances permitting development in Metropolitan Open Land ("MOL").
- 2.2 Richmond upon Thames Planning Policy Local Plan Policy supports the protection and enhancement of such facilities and maximising the potential of existing sites.
- 2.3 Any moderate harm to openness is outweighed by the improvements and enhancements proposed to this low quality portion of the MOL, and building is small scale.
- 2.4 The test on permission to build in MOL weighs benefits against harm. The scheme demonstrates quantitative and qualitative benefits that greatly outweigh any harm. Further evidence demonstrates the highest level of priority need for facilities for SEND children in the light of the SEND services funding crisis (see Appendices 43, 44, 48, - Letter to MPs on SEND funding crisis, and Letters of Support from the Director of Children's Services and the Managing Director of AfC). Additionally, the proposal meets the need for nursery places in the area, see Appendix 50.
- 2.5 The size of the proposals matches Best Practice and Local Authority briefs on required floor areas. The current buildings are not fit for purpose and extension or refurbishment are not viable. The increased footprint sought is the minimum size required in order for the charities to be financially sustainable. There are no alternative sites available. (Appendices 67-69)

3.0 PLANNING POLICY POSITION

In this section we set out the applicable planning provisions.

- 3.1 Marble Hill Playcentres is sited within Marble Hill Park. It is an established use as play space, nursery (education), and parental support. Its large external play areas in a wooded setting are a very unusual asset. The site is in MOL.
- 3.2 As a consequence, development can only be permitted in the existing use and Very Special Circumstances must be demonstrated.
- 3.3 As referenced in section 1.1. we have consulted with a planning consultant who has provided us with a "Technical Note & Summary Position for demonstrating 'Very Special Circumstances' for developing on Metropolitan Open Land (MOL)". This technical note and summary position should be read in conjunction with the report setting out the context and very special circumstances, prepared by Marble Hill Play Centre and the Preliminary Design and Access Statement, prepared by Martin Habell. See Appendix 1 for the full Technical Note.
- 3.4 For a full assessment of the proposals against the relevant planning policy please see the Planning Statement submitted with this application. The relevant policy in relation to MOL is set out below.
- 3.5 Paragraph 144 of the NPPF is relevant and states that The borough's Green Belt and Metropolitan Open Land will be protected and retained in predominately open use. Inappropriate development will be refused unless 'very special circumstances' can be demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land. Very Special Circumstances are not defined within the NPPF.
- 3.6 Policy 7.17 of the London Plan states that "the strongest protection should be given to London's Metropolitan Open Land and inappropriate development refused, except in very special circumstances, giving the same level of protection as in the Green Belt. Essential ancillary facilities for appropriate uses will only be acceptable where they maintain the openness of MOL". Policy 7.16 of the Plan states that, in relation to the Green Belt, "inappropriate development should be refused, except in very special circumstances".
- 3.7 Policy LP 13 of the Local Plan states that "the borough's Green Belt and Metropolitan Open Land will be protected and retained in predominately open use. Inappropriate development will be refused unless 'very special circumstances' can be demonstrated that clearly outweigh the harm to the Green Belt or Metropolitan Open Land".
- 3.8 Policy G3 of the Draft London Plan states that "development proposals that would harm MOL should be refused. MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt".
- 3.9 The proposals do not fall within the exceptions set out in the NPPF, therefore, the proposals are inappropriate development and will need to demonstrate 'Very Special Circumstances' in accordance with national policy tests.

4.0 GROUNDS FOR CONSIDERATION AS "VERY SPECIAL CIRCUMSTANCES"

4.1 The Scheme Considered in Planning Context

- 4.1.1 The use of the site and proposed buildings remains as before. The primary function in the exterior and interior is children's play. This accords with

designated use of MOL. The particular need of these children for security, shelter, toilets, staff and inside play space is an intrinsic part of the overall use.

- 4.1.2 Sections below demonstrate the following ‘Very Special Circumstances’:
- Community benefit greatly outweighs any perceived “Harm” to MOL
 - The MOL is enhanced
 - There is no encroachment on neighbours
 - Impact in terms of traffic and nuisance is minimal
 - Benefits range from care and education, to jobs and health
 - The proposal helps meet two priority needs for the Borough, including the SEND services crisis which we understand to be the biggest need facing the Borough

4.2 Priority Need: SEND Services

- 4.2.1 The crisis in special needs funding is evidenced by the Letter dated 21st January 2019 to The Secretary of State for Education, The Secretary of State for Housing, Communities and Local Government, and Cllr R Brown, Cabinet member for Finance and Performance LBRUT. It was signed by MP’s: Sir Vince Cable, (Twickenham), Zac Goldsmith, (Richmond Park), Sir Ed Davey, (Kingston and Surbiton), Sarah Jones, (Croydon Central), Steve Reed, (Croydon North), Tom Brake, (Carshalton and Wallington), Paul Scully, (Sutton and Cheam) and Siobhain McDonagh (Mitcham and Morden). It was copied to the RT Hon Elizabeth Thross MP, Chief Secretary to the Treasury (Letter included at Appendix 48). In addition, a follow-up letter from Cllr Brown was sent to Education Secretary Williamson in July 2019 (Appendix 56.)
- 4.2.2 The letter stated a crisis in High Needs Funding for children with SEND. It observed that funding has not matched the number of Education, Health and Care plans (EHCP’s) agreed to support those with SEND.
- 4.2.3 The letter points out that as the funding is ring fenced there is no requirement for a Local Authority to top it up. As a consequence, this places Local Authorities in a dilemma where they have a statutory requirement to provide SEND services but inadequate ring-fenced funding.
- 4.2.4 As a consequence of this crisis the action of charities and local non-governmental organisations to provide such SEND services and support is overwhelming to be encouraged.
- 4.2.5 Please see letters of support for the Project from the Director of Children’s Services and the Managing Director of AfC at Appendices 43 and 44 and letters of support from Sir Vince Cable MP and Zac Goldsmith MP at Appendices 45 and 46.
- 4.2.6 Please see emails of support from the Cabinet Members for (i) Children’s Services; (ii) Equalities, Communities and the Voluntary Sector at Appendix 47.
- 4.2.7 Please see letters and emails of support from local SEND charities and organisations at Appendix 50, including: Small Steps, Phyz, the Auriga Academy Trust, 21&Co, Richmond Borough Mind, ADHD Richmond and Kingston, RUILS, and Richmond Mencap.

- 4.2.8 There is a great need for SEND services in the Borough of Richmond. It is estimated that there are almost 1,500 “Children In Need”, around 1,500 children and young people (aged <25) have limiting long-term health problems or disabilities, almost 2,000 children (aged <16) are estimated to have a mental health disorder, around 500 have a moderate physical disability, and over 100 have autistic spectrum disorders (statistics from LBRuT SEND services report, available at <https://www.datarich.info/health-conditions/send/>). The Proposals fill the need for SEND services through:
- 4.2.8.1 free access to the Playcentres facilities for families with SEND;
 - 4.2.8.2 specific sessions for families with SEND provided by both Skylarks and the Playcentres, as well as support provided for children with SEND to join the “universal” sessions;
 - 4.2.8.3 appropriate adapted facilities provided for children with SEND. Note that the current facilities are not accessible for children with any physical disabilities which is unacceptable. There is some accessible equipment at the Redlees Centre in Isleworth, but the closest accessible Adventure Play facilities are either in Taplow, Maidenhead or Chessington.
 - 4.2.8.4 a home for Skylarks (please see Skylarks website www.skylarks.charity/ and Skylarks VSC Report (Appendix 77) for details of the SEND services they provide);
 - 4.2.8.5 a home for the Otakar Kraus Music Trust (OKMT) (please see OKMT website www.okmtrust.org.uk/ and OKMT VSC Report (Appendix 76) for the details of the SEND services they provide);
 - 4.2.8.6 a Changing Places toilet (being a toilet suitable for children and adults with all disabilities as they include extra equipment (such as a hoist) and space to allow them to use the toilet safely and comfortably). There are no such facilities in Richmond or Kingston currently. (The closest facilities are in Kew Gardens, Heathrow Airport, the Lyric Theatre Hammersmith, Wimbledon Tennis Club, Ealing Shopping Centre.) The lack of these essential facilities is a significant factor preventing disabled persons being able to leave the house. We understand that it is very difficult to retrofit a Changing Places toilet into an existing facility (where all the existing space is fully utilised) because of the additional space needed for these facilities;
- 4.2.9 In addition to the provision of SEND services, the Playcentres also provides much needed free access to play and support facilities for low-income families, a vital provision in a Borough with an estimated 3,000 children living in poverty (statistic from LBRuT SEND services report, available at <https://www.datarich.info/health-conditions/send/>). A review of SEND services in Richmond and Kingston further outlines this need (Appendix 57).
- 4.2.10 Wild Future, play provisions experts, acting on behalf of Richmond planning authority, has provided observations relating to the redevelopment of the site, see Appendix 66. Wild Future observes that it is “clear that the Playcentre must be judged as a different type of service to a typical public play facility,

and serves a wider district. Research shows there are some facilities with overlapping offers in Brentford, Surbiton and Hampton but without the outdoor aspects that is at the centre of the Playcentres service. As such, there appears to be demonstrated need at least on a village level, and likely in terms of the west of the borough, for the facility at Marble Hill. This is underlined by the fact that it is being run and re-developed by local people to ensure that the facility is retained, as its loss would leave a gap in local provision". Additionally, Wild Futures note that "Marble Hill Playcentres does sit in a small area of deficiency between the Council-maintained play areas at Cambridge Gardens and Orleans Gardens".

4.3 Benefit of Nursery Offering Free Early Years Funded Places

- 4.3.1 The Early Years Business and Administration Team Manager confirmed (see Appendix 51) that: "a community based nursery that could offer free early education funded places for the 15 and 30 hour provision would enhance the provision in the Twickenham Riverside locality. Recent information has identified that the uncertainty of Brexit has resulted in a reduction in the number of nannies, which will impact the number of childcare places sought by parents; [and] as the number of parents accessing the 30 hour offer grows, so will the demand for additional childcare places... A nursery offering the free early education funded entitlement completely free to parents for their 15/30 hours EFF should attract much interest".
- 4.3.2 The current Nursery provides places on extended hours, to allow working parents to retain employment. There is a waiting list indicating need. The Nursery is also contractually committed to providing 3 places for Early Years Funded 2 year olds for up to 15 hours per week each (without any additional funding required), ensuring that the benefits of this nursery are shared with low-income families. The Nursery also works in partnership with Orleans Primary School to jointly deliver the 30 hours working families provision which supports families where each parent (or lone parent) are earning the equivalent of working sixteen hours per week on the minimum wage.

4.4 Public Health

- 4.4.1 It is recognised in LBRuT Policy that the nursery and recreation facilities have distinct benefits in the mental and physical health of the community. The generations of users have long acknowledged that this facility of club and play areas were invaluable in combating parent depression through the provision of peer support. This need for peer support is particularly pronounced for parents of children with SEND (see data in Appendix 55 "On the Edge" Report and in the Skylarks VSC Report at Appendix 77). Recent research has demonstrated a clear link between child obesity and parental depression.
- 4.4.2 The proposal is that the Playcentres hub will link in seamlessly with the local "Health" provision and we are in discussions with the relevant people. Please see letter of support from a local GP at Appendix 58.
- 4.4.3 The large outside space is the community's "back garden", especially important for those who live in flats. The Adventure Playground provides a

safe place for children to experience “playing out on the street” within the safe confines of the centre.

- 4.4.4 The Playcentres focus on “children-led”, “adventurous” play within nature is unique. The facilities at the Adventure Playground enable children to learn to problem solve and take small risks, which has been shown to increase their physical, emotional and social confidence as well as building resilience, shown to be key in combatting the rising rate of teen mental health issues (see data in Appendix 55 “On the Edge” Report). The Managing Director of AfC writes that “Problem solving and (minor) risk taking that children are able to practice in an Adventure Playground, [are] valuable in developing physical and emotional resilience and aiding mental health” (see Letter at Appendix 44). At its most fundamental the facility educates children through play to be sociable and acquire motor skills and reasoning ability. It goes far beyond this with SEND in helping with learning and therapy.

4.5 Urgent Need: To retain and expand voluntary services in the face of a general funding crisis

- 4.5.1 The letters from Hampton Fund, RPLC, the Richmond Council for Voluntary Services (RCVS) and the support of the Cabinet Member for Equalities, the Community and Voluntary Services and the Cabinet Member for Children’s Services (see Appendices 47 and 52-54) emphasise the critical need to support the voluntary sector as it adapts in order to survive in the face of a general funding crisis, both public and private. The magnified benefits of creating a hub, as envisaged in the Proposal, are endorsed by all. Please also see an overview of the “hub” envisaged by the Playcentres at Appendix 70.

- 4.5.2 Relevant extracts from the “On the Edge” report (included as Appendix 55) below:

- 4.5.2.1 *Local charities and numerous community organisations are “on the edge”. “In recent years, a number of charities have closed down as funding has been harder to find. This report highlights the probability that others may also have to bring an end to the services they offer to vulnerable people.”*

- 4.5.2.2 *“Many commented that there is a consistent lack of preventative support to help people avoid getting into crisis. Many feel there is a need for the voluntary and community sectors to connect and collaborate more.”*

- 4.5.3 Both local funding charities acknowledge that if the status quo is maintained demand will exceed resource and the time will soon come when some good local organisations may not have sufficient funds to continue working in the Borough.
- 4.5.4 A new collaborative, locally-focused and people-led way of helping local residents could allow the considerable untapped resources and capacity within the Borough to be used in a more effective and sustainable way.
- 4.5.5 Moving back from the edge of crisis to stability and growth can be made possible if funders, providers, commissioners, the voluntary sector and importantly, local residents work together. Fresh thinking and collaboration

are needed to stop the working in isolation (silo thinking) and crisis management currently taking place.

- 4.5.6 In the workshops a key suggestion was to encourage greater collaboration and co-ordination between key stakeholders in Richmond, between Richmond Council, schools, the health service and voluntary and community sector organisations (VCSOs). Enhanced co-ordination would help to avoid duplication of services and provide more holistic support to individuals. It would also improve signposting to other services and make it easier for residents and service users to navigate the system. The lack of collaboration and difficulty of navigating the system are key examples of system failure in Richmond.
- 4.5.7 There could be improved collaboration between key stakeholders and services which support particular beneficiary groups or themes, such as young people.
- 4.5.8 *“Place-based giving is a way of bringing together different kinds of funding alongside donations of time and resources on a single platform which then distributes grants to local charities and groups alongside developing programmes to support the specific needs of a local place.”* City Bridge Trust – Review of Strategic Initiative into Philanthropy 2016. (The creation of a hub lends itself to Place based giving opportunities).

5.0 CURRENT CONDITION OF FACILITIES

- 5.1 The current buildings are 60 years old and a normal life expectation for such buildings would be 30-40 years. They were built as garaging for Marble Hill Park maintenance vehicles, and as a consequence access and rooms bear no relation to actual need. The buildings have no wall insulation and no installed heating. One room of 18m² is simply created by an external wall of PVC sheet. The total existing internal floor area is 170m² and the gross external 206 m².
- 5.2 Refer for detail to the Condition and Use Survey dated 1st March 2019 by Maybourne Projects in Appendix 61 which concludes that the current facilities are not fit for purpose and are inadequate in terms of size.
- 5.3 Refer to the comments on the poor state of the buildings in the Letter from English Heritage at Appendix 40. Therefore, reuse of the existing buildings is not feasible.

6.0 OPTION APPRAISAL

6.1 Do Nothing

- 6.1.1 The buildings were designed as stores. They have no heating, out of date electrics, no insulation. The staff complain of the cold and working conditions are below requirements. The recent rise in Minimum Wage and the increase in Utility costs have made overheads difficult to carry. Without some action there can be no future for the facility as cost of heating by inefficient (and non-sustainable means) is prohibitive where the warm air rises into the uninsulated roof voids and the windows and doors allow cold drafts. Note

comment from English Heritage in their letter that “in their current condition, long-term maintenance is unsustainable”.

6.1.2 There is insufficient space to take on new children and yet costs are rising and in the past the facility has had to rely on financial assistance from Trustees. None of this assistance is now available.

6.1.3 The Playcentres nearly shut in October 2017, the new Board of Trustees benefitted from pro bono advice from a Deloitte strategy consultant and concluded that “the current model is broken”. Historically there has been a dependency on external funding (including from the council) and Section 4.5 above explains why this funding is in steep decline and not sustainable. The Proposal has been developed to save the Playcentres from onward decline. This is a pivotal moment to save and enhance this valuable community asset.

6.2 Spot Repairs

6.2.1 Expert reports have established that repair is not viable on practicality grounds given the needs of the playcentre. Windows and external timber are rotting, major areas are single glazed, frames vary, interior finishes (where they exist) deteriorating. Gutters have parts missing and other taped together.

6.2.2 Repair is in effect no different from the following section on refurbishment, other than that the environment will rapidly fall below expectations of parents and licensing authorities. There are no funds for adequate repair and this does not solve the problem of viability.

6.3 Refurbishment

6.3.1 The expert report on Building Condition, see Appendix 61 demonstrates that refurbishment would be impossible without closure and would diminish the available space at the end. The refurbishment must be carried out to current building regulations, and sustainability criteria are impossible to meet.

6.3.2 Simple requirements are rendered impossible: For example, the application of Part M Building Regulations for the use of the disabled requires widening of doors and lobbies. The heavy work on walls would threaten their stability.

6.3.3 At present all electric services are surface fixed. They have to be concealed.

6.3.4 The floor is too cold and wet for crawling babies and small children, and a heated floor is the logical specification.

6.3.5 Floors should be finished with curved skirtings to allow complete wash down for hygiene.

6.3.6 The heating system will have to be sustainable. At present there is no installed heating.

6.3.7 The result is that the work would be expensive, and lead to the inevitable conclusion that new build is cheaper and more practical

6.3.8 Please note that prior to a rebuild being explored, the Playcentres exhausted other options, namely refurbishment of the Adventure Playground building to make it winter-proof and use of portacabins to provide extra space (Please see quotes at Appendices 62 and 63). Unfortunately, these proposals were unfeasible as they did not create enough space to be financially viable, in addition to the portacabins being unsightly.

6.4 Move elsewhere to other venues

- 6.4.1 There are firm criteria that govern consideration of a move:
- 6.4.2 LOCALITY: MHPG serves the immediate local area, and is easily reached by public transport and by foot.
- 6.4.3 SPACE: It has a third of a Hectare of land for the various play mediums which would not be found elsewhere.
- 6.4.4 SECURITY: for children is a growing issue and must also accommodate SEND considerations on safety and access. The current location provides rare simple delivery of disabled children to the site.
- 6.4.5 ACCESS: where there is capacity for cars, and excellent public transport.
- 6.4.6 HEALTH: whereby fresh air is plentiful. This accords with Government and Mayor of London pressure to move nurseries away from traffic.
- 6.4.7 Please see Appendix 64 for Report on the consideration of “Alternative Land Requirements”. Alternative venues, were they available, could not meet these requirements.
- 6.4.8 We have confirmed with the Head of Valuation and Asset Management Service at the Council that the Council does not have any suitable alternative venues, see Appendix 67.
- 6.4.9 Other informed local bodies including those associated with the Council, confirm a lack of alternative venues (see Letters from RPLC, HFAC and RCVS at Appendices 52 to 54).
- 6.4.10 Wild Futures, acting on behalf of the Richmond planning authority, (see Appendix 66) confirm that “all green space locations in the borough will be protected through designation as Metropolitan Open Land or Other Open Land of Townscape Importance and thus will face similar restrictions as Marble Hill Park. Some locations may not have the additional designations of Conservation Area and Other Site of Nature Importance, designations which may restrict design or require mitigation... However, the redevelopment also offers opportunity to improve the existing site appearance and biodiversity value”. Wild Futures also notes that although “opportunities may exist within brownfield sites but these sites are likely to be available only on a commercial basis and re-creating a landscaped environment may add significant costs... [the Playcentres] may therefore be able to demonstrate ... That alternative locations would be of equal landscape sensitivity and of low financial viability”.
- 6.4.11 Alternative sites are impossible to find, given the criteria. This is confirmed by property agents Jardine and Co (see Appendix 65).
- 6.4.12 Please see details of the lack of alternative venues plus recent searches for Skylarks and OKMT at Appendices 68 and 69.

7.0 BUILDING OPTIONS

7.1 Option studies on building forms have been conducted. Six build options have been evaluated:

- 7.1.1 Option 1: Do Nothing. This is addressed above in Section 6.1.1 and proved unworkable, and offered no secure future.

- 7.1.2 Option 2: Refurbish and/or extend. Refurbishment is covered in Section 6.1.5 above. Extension would not create the sustainable solution needed to support the inclusion of special needs children and families.
 - 7.1.3 Option 3: Rebuild to same size
 - 7.1.3.1 The required area space allowances prevent a repeat of what is there. A check of space shows that play space per child should be calculated as area free of all staff and service and door swings and staff furniture. It does not meet those criteria and relies on the Ofsted interpretation available for considering valued existing premises. To rebuild requires new standards which are larger (See Section 8.0 of the Design and Access Statement).
 - 7.1.3.2 In addition, there is no mobility allowance in terms of user space and special toilets.
 - 7.1.3.3 See Section 7.3 for the reasons why we need to include OKMT and Skylarks in the new building.
 - 7.1.3.4 See the Design & Access Statement and Section 9 below for further details justifying the proposed size of the new building and Section 8 explaining the uses of the new space.
 - 7.1.4 Option 4: Single level facility. The ground only solution appeals on the basis of management but can only achieve 750m² gi and severely prohibits planning for disabled and would not be sufficient space to include Skylarks and OKMT. Please see Section 7.3 for an explanation of why we need to include OKMT and Skylarks in the new building.
 - 7.1.5 Option 5: Ground and Basement Floors. The basement raises concerns over means of emergency escape for SEND children.
 - 7.1.6 Option 6: Three level facility (Basement, Ground and First Floor). While this achieves the space required, the basement issue for SEND remains and management, fire escape and communications problems grow and access to the outside reduces.
 - 7.1.7 Option 7: Ground and limited First Floor. There are constraints but this provides sufficient floor area for viability and future flexibility is achieved. Access to outdoor space is maximised and SEND emergency escape issues are addressed. The design allows faster construction with lower on-site Preliminaries.
 - 7.1.8 Option 8: Phased development. This was considered for all the options above. However, it prolongs park disturbance and has issues of site safety for children.
- 7.2 The Chosen Approach
- 7.2.1 We have concluded that Option 7 (Ground and limited First Floor) is best. This decision was justified to the Officers by the reduced mass, low profile and curved sedum rooflines to achieve a less monolithic effect. Option 7 has been fully costed to confirm the build cost by a Chartered Surveyor which can be supported by group fundraising efforts.
 - 7.2.2 The chosen Option achieves:

- The massing as designed is the most likely to gain support in consultation and being compatible with the surroundings
- Best value return in child space for the cost as gauged by charities
- Maximum space for childcare and play
- A sympathetic and ecological building
- A specifically designed child-scale building

7.3 Why we need to include Skylarks and OKMT in the rebuild

7.3.1 The Playcentres is a small charity which, acting alone, has a very vulnerable future. The acknowledged best way forwards for small local charities is to work together to achieve sustainability by creating efficiencies, synergies and sufficient critical mass. In order to provide the SEND services needed by the Borough, the Playcentres needs to work with other charities and after an evaluation of the most appropriate charities, Skylarks and OKMT were identified as the best fit. Skylarks' large pool of volunteers and specialist knowledge in all matters SEND and OKMT's specialist music provision would enable SEND services to be sustainably and professionally provided from the Playcentres' site.

7.3.2 Without these charities, the Playcentres would be unable to provide the required holistic SEND services the community needs. Additionally, without evidencing the magnified impact a "hub" makes, we would not be able to fundraise for the costs to rebuild (even a smaller) centre. Funders have made it clear to us that full accessibility and inclusion of SEND services is essential in order to raise funds to renew the Playcentres.

8.0 THE PROPOSED USE OF THE NEW BUILD

8.1 The new build is proposed as a Community Hub, serving as a centre for all local families. More information is included in the Planning Statement and the Draft Community Use Agreement.

8.2 Please see a chart showing the proposed uses of the different areas of the building at different times of the day and during term-time and holidays at Appendix 60 (Space Sharing and Use Draft Proposal.) This chart demonstrates that the building would be used to its maximum capacity either through community uses or through raising income to support and subsidise the community uses.

8.3 Please see the proposed "hub" function of the centre at Appendix 70.

8.4 Please see the letter of support and intentions to use the Playcentres' site for school use from Old Deer Park School at Appendix 51.

8.5 Please see the support letter included in Appendix 50 from the Auriga Academy Trust (the trust which provides SEND education, including the new Amyand House School). This letter confirms that "the new playcentre would be an organisation with which we could collaborate to maximise our contribution to the local community".

8.6 Please note that access to the Playcentres will remain free/low-cost for low-income families and we would hope to increase uptake to reach many more low-income families with the provision of revitalised facilities and more services.

8.7 In discussions with David Allister, Head of the Council Park's Department, the advantages of local schools using the Playcentres instead of public parks for their off-site play were noted, namely the reduced wear and tear on public parks as well as avoiding school of public parks use preventing wider public use.

9.0 THE PROPOSALS: MINIMUM SPACE REQUIRED

9.1 Please see the Design & Access Report for subject by subject analysis on the building size, usage requirements, etc.

9.2 Please see projected user numbers in Design & Access Statement, Section 16.

9.3 Please see the Briefed Areas from Tenant users at Appendix 71 and Testing the Design Brief against Good Practice Requirements at Appendix 72.

9.4 Requirement for the proposed Nursery space

9.4.1 To our knowledge, there has consistently been an early years nursery (age 2-5 years) operating from the One O'clock Club part of the site for more than 20 years, both to meet local need for nursery places (see Section 5.4) and to provide essential fixed income for Marble Hill Playcentres.

9.4.2 The current licence arrangement between Marble Hill Playcentres (as the holder of the lease with English Heritage) and the Nursery was entered into on 20 December 2016 and the fees per annum the nursery pays has played a significant role in avoiding insolvency.

9.4.3 The current Nursery tenant licence expires 20 December 2023. The licence will therefore be ongoing during the rebuild and the Playcentres' intend to honour this by helping find alternative space close-by for the Nursery to operate from as this fixed income is a vital cross-subsidy for the Playcentres.

9.4.4 Please see Nursery and Early Years Design Brief in Appendix 73 for justification against the space requirements for nurseries as required by Ofsted. Ofsted show some discretion in relation to the space requirements for existing buildings (for example, the current building), but this discretion is not extended to any new builds which must be in full compliance.

9.4.5 Please note that the proposed capacity (number of children) of the Nursery in the new site has been decided based on the minimum Playcentres' need for the fixed income.

9.4.6 Please note that as a Nursery tenant is a commercial entity, the Playcentres is able to charge a higher rent for the space. If the Nursery terminated their licence, the Playcentres would need to seek another private hire nursery licensee to provide reliable fixed income to ensure financial sustainability.

9.4.7 Please note that any Playcentres' surplus would be invested back into the community either through the provision of new services or directly. The Playcentres is a registered charity.

9.5 Requirement for the new proposed space

9.5.1 The Adventure Play and One O'Clock Club space required is based on existing usage of the space and the ability to continue to provide services throughout the year (currently the centre shuts in the winter and has minimal space to provide services in inclement weather.)

9.5.2 Please see the Reports at Appendices 76 and 77 which details the services of both Skylarks and OKMT and their increased need and use requirements which could be satisfied in the proposed space.

9.6 As agreed at the Planning meeting of 27 March 2019, that if needed we will revert with an application for temporary classrooms for Nursery during the rebuild at a later date.

10.0 OUTWEIGHED HARM TO METROPOLITAN OPEN SPACE

10.1 The MOL portion where the site stands is low quality. Openness is already compromised by the sharp architecture and disposition of current buildings. Quality is not assisted by the lack of onsite trees and the bright colours on brickwork and timber that show up from the river.

10.2 A large proportion of the proposed Buildings are lower than the existing and extend no further east to west, and less north to south.

10.3 As a consequence, the visual intrusion over and above what is there is very limited and quality is improved.

10.4 See the Section 14 on Benefits to MOL.

10.5 See photomontage of Proposed Build in Appendix 8

11.0 VISUAL IMPACT ASSESSMENT:

11.1 No Visual Intrusion but Instead an Enhanced Ambience

11.1.1 A full Visual Impact Assessment has been provided by Terra Firma. See Appendix 7, Landscape and Visual Impact Appraisal (LVIA). The assessment is that the low nature and sympathetic form of the buildings in appropriate cladding substantially reduces visual impact over what is there presently.

11.1.1.1 Notwithstanding a necessary increase in footprint, the building will not result in significant harm to the open character of the MOL, the setting of the Historic Park and Garden and setting of Marble Hill House.

11.1.1.2 The footprint is well outside the sight line from or to Marble Hill House and is obscured by trees.

11.1.1.3 The proposed building is lower for the most part than the existing and substantially lower than neighbouring buildings.

11.1.1.4 The proposed building lines do not extend further than the spread of the existing buildings.

11.1.1.5 The green gap between the proposed building and the sports block is preserved.

11.1.1.6 There is no significant loss of non-hard surface.

11.1.2 English Heritage is supportive of the proposal. They have expressed concern that the current buildings are inappropriate to the natural and historic setting of the Park and House (See Appendix 40). Liaison Meetings have ensured cooperation and their views taken on board. They like the change and this design because the building form is organic and will use timber and other natural materials and avoid bright colours seen from the park. At the present

time the facilities are a sharp and intrusive shape on the perimeter of the setting.

11.1.3 Photographs of the existing site (seen in the Landscape Statement, Appendix 5) indicate the poor visual impact of the current buildings as seen from the main open MOL. These show that in the view from the south (river side) the existing buildings are seen against a backdrop of substantial and very visible buildings off-site. The view from the west demonstrates the poor view across a public car park.

11.1.4 The proposed building's building lines do not extend further than the existing, and the roof line is lower. The colours are more muted and the shapes more sympathetic to the natural setting.

12.0 NO EFFECT ON THE SKY LINE

12.1 A large proportion of the proposed buildings rise no higher than the existing, indeed the leading south and west masses are notably lower. The first floor is set well back at the north and is backdropped by considerably higher buildings and tree lines.

12.2 The shape and colour of the proposals is designed to echo the trees and surroundings and blend in.

13.0 NO LOSS OR HARM TO HERITAGE

13.1 English Heritage (under licence from Historic England) has written to state they have no objection to the removal of the current buildings and a meeting was held on November 14, 2019 with Historic England with results fed back directly to English Heritage. Marble Hill Society is fully supportive (see Letter of Support at Appendix 41).

13.2 A Historic Environment Record search was completed by GLHER for the Playcentres and nothing significant was noted. The search included a report of the HER database records within the search area; GIS shape files; A check of Monument and Event point data around search area; Creation of full Event database records for any skeleton Event records; Creation of Event GIS polygon records for any skeleton Event records; Create of full Source database records for any associated skeleton Event records if required.

13.3 A Heritage Statement has been prepared and is submitted with this application Appendix 19.

14.0 APPROPRIATE TO ENVIRONMENTAL POLICY

14.1 The Environment Trust, a proposed partner in the proposed redevelopment in advising on planting and landscaping to increase habitat and in collaborative local efforts in the new centre, have written in wholehearted support of the proposal on the grounds that the use is absolutely in accord with its emphasis on learning about and experiencing nature. The proposal will, they say "importantly, enable children and their parents to acquire the knowledge, attitudes and values necessary to help shape a sustainable future" (see Appendix 42).

15.0 BENEFITS OUTWEIGH ANY LIMITED HARM

15.1 The perceived benefits are:

- 15.1.1 There is a cumulative effect of the holistic solution based on sensitive and organic buildings, landscape, wild life and awareness of it. This is environment enrichment.
 - 15.1.2 The support of children has a vital influence, acknowledged by Research and Government, on adult mental health as well as child development. This makes for a better community, reduces strain on Health Services and saves money in the long term.
 - 15.1.3 Nursery and SEND services and facilities are a Priority need in the Borough.
 - 15.1.4 There is a domino effect across the Borough by nursery closures raising need for more places in surviving ones. This project helps solve the problem.
 - 15.1.5 The preservation of existing services that provide child care and education are important given the loss of other facilities.
 - 15.1.6 There is a significant contribution to landscape setting.
 - 15.1.7 The low quality part of MOL is enhanced.
 - 15.1.8 An enhanced biodiversity by more trees and plantings is achieved.
 - 15.1.9 Benefit in using the setting for education.
 - 15.1.10 The nature of the building and users means there is no clear distinction between inside and outside in play and learning all times of day. As a consequence, the purpose of MOL is not undermined.
 - 15.1.11 Health and Safety gains include:
 - Secure site monitored by staff
 - Calming and stimulating zones as required
 - Therapy
 - Counselling
 - Diet control for (and lessons in) for all children
 - Tackling child obesity, dangers of future Type 2 diabetes, cognitive challenges, respiratory disease and parental issues
 - Tackling lung disease from pollution by clean air setting
 - Inclusivity for SEND
 - Traffic free
 - Dog free
 - Accessible
 - A new Changes Spaces facility
 - 15.1.12 Such facilities are significant employers and benefit the community by the range of skills and training, and flexible shift hours.
- 15.2 Assessing Potential Harm
- 15.2.1 The points that can be evaluated are:
 - 15.2.1.1 Minor loss of open space behind current buildings;
 - 15.2.1.2 A new building
 - 15.2.2 The potential Harm is whether there is loss of Metropolitan Open Space. However, the space under consideration is barely visible from the park, has hard surface, is encompassed by existing buildings, and is criticised by English Heritage as a poor setting.
 - 15.2.3 The site has no general public access.
 - 15.2.4 The proposed built area is predominantly hard surface.

- 15.2.5 The Marble Hill Park 10 year management plan (No 3 section 5.4.5) in the Planning application states: “the play centre contains brightly painted timber play structures detracting from the setting of the house” ...new structures will not be brightly painted.”
- 15.2.6 The same Plan (No 4 section 7.4.5) states “thickening of the trees on north and east edges and aim to reduce impact of the play centre”... the new design and landscape assists this. The north Belt is Category B.

16.0 ADDITIONAL VERY SPECIAL CIRCUMSTANCES

16.1 An enhancement of MOL role

- 16.1.1 The purpose of Metropolitan Open Land is recreation play and sport. The established use of the site is play, games and education through play.
- 16.1.2 An intrinsic part of this use for children is the lack of distinction between outside and inside space in so far as they are both used for play and they need protection from weather. As a consequence, it can be strongly argued that rather than diminishing the recreational use of the land the proposals enhance the capability of the land for its designated purpose.

16.2 Protection of MOL for the future

- 16.2.1 There is case precedent that the approval of certain buildings in MOL ensures the onward protection of MOL by preventing future loss.
- 16.2.2 In this project’s case the failure of the Nursery Use would leave the building unoccupied and be unlikely to be taken up by the same approved use.
- 16.2.3 It will be hard to find other compliant uses. Continued non occupation can lead to dereliction and destruction by vandal attack as is known in the area. The result would strengthen a case for different development over time which would be extremely unlikely to improve the MOL to the degree achieved by this scheme.
- 16.2.4 This development protects the MOL into the future.

17.0 SUPPORTING DOCUMENTS - The full list of supporting documentation can be found in the Planning Statement.