

ALTERNATIVE LAND REQUIREMENTS FOR MARBLE HILL PLAY GROUP

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This report addresses the criteria applied under Very Special Circumstances to demonstrate the inability to relocate to another site and building new facilities. The problems of finding alternative existing built venues is covered elsewhere.

1.0 In the event of searching for a new site for premises seven important factors apply

1. Size
2. Availability
3. Correct Planning Use Class.
4. Funds to purchase with all associated acquisition costs
5. Correct time frame
6. Loss of user base
7. Health requirements

2.0 The difficulties in each aspect are:

1. Size of plot

The land recommended for external play is 9m² /child for nursery

Kent County Council Early Years Design Brief allows 10m²/child (see Appendices)

Adventure Play, with larger structures and older children is generally 12m²/ and over.

Recreating the existing facilities to the regulatory standards of Ofsted, Part M disability and other governance results in a significantly larger building than currently: the building for the current uses would be approximately 500m² gross external. Adding Play areas to recommended sizes for children adds 1,300m².

The result is that simply to replicate the needs elsewhere, the external play zones plus a new regulatory compliant building for only the One o Clock, Mandarin Ducks Nursery and Adventure Play would be 1,800m² or 0.18 ha. This would be a poor comparison with what is actually available at Marble Hill at 0.38 ha. Over twice the size

Half the size of current land would in reality result in excessive foot fall: over-use of landscape and grass will wear out leaving large areas of mud. Over-wear is already apparent at the MDN garden.

2.Availability

Expert agents in the area (e.g. reference Jardine) have written to say the likelihood of land of sufficient size becoming available is virtually nil. Community projects such as this rely on “gifted “ land, as charities cannot afford market rates or indeed any land purchase funds. No available land is available. This is supported by the difficulties Richmond Council has had in finding school sites. In addition, the size, position in the community, access and transport impact are difficult requirements to overcome

2. Correct Planning Use Class

The current use at Marble Hill is D1 and D2. Few if any sites come onto the market with a community Use Class such as this. Gaining a Change of Use approval to D1 requires a long time frame, and judgements may well be weighed against other community needs such as housing. House builders compete for land for C3 Planning Use Class, knowing it is supportable in Planning Policy on basis of need.

3. Funds for purchase

The Borough confirms the lack of any suitable land to gift to MHPG and even were it the case that such a site existed, the question of value would be a problem. It would be weighed against the Council's own needs. Alternatively the route might be inclusion as planning gain in a large private development, however the land requirements are totally unsupportable by private development in any scenario in the Borough. An inclusion in affordable housing projects would face the same problem, especially as affordable family housing is a council priority as well. As a result land purchase is the only alternative.

It is hard to price such land but the area required, if any possibility of building exists, places the cost at a minimum of £2m

Evaluating in abstract: Applying a general development rule that residential land cost represents 30% of property sale prices. The minimum land needed elsewhere for a nursery would be 0.18ha, which equates to a minimum of 12 family houses @ 80m²; total sales being £11m+, placing a value on the land at £3-4m. Deducting for CIL's and 50% affordable proportion the possible price is around £2-3m minimum. Family homes are a Planning Policy priority and so developers have a good chance of obtaining approval.

The charity cannot raise this and compete.

4. A long Time Frame

Excluding the land search period which could take years, the time frame for purchase relies on the adequate funds for purchase being available. Charities cannot move fast and are constrained by due

diligence and probity. They are usually out-competed by developers with access to risk capital. The purchase process may well take 9 months at best.

Vacant land in itself is not a fast route. Negotiating a new use with planners may take a year. The planning process with traffic assessments, seasonal environment surveys and expert reports another year. The planning application and approval will absorb at least 6 months. Assuming funding is available for build then technical information absorbs six months and tendering 3 months, and construction to commissioning possibly 12 months.

It indicates a process to a new site would, if the large sums are available, take at best 6 years and if telescoped by planning being fast tracked before purchase, which is unlikely unless a hold on purchase by others, five years.

5. Loss of user base

The closure of the existing facility would have to follow termination of lease agreements. Any new site has to be commissioned and the transfer of activity will usually result in loss of some staff and parents unwilling to travel elsewhere.

New users will take time to accumulate. The cost of loss of income and transfer costs is in itself a high additional burden.

6. Stringent Health and Environment Requirements

The Mayor of London has just instigated a programme to install air cleaning apparatus, and add pollution particle landscape screening to nurseries besides main roads. The awareness of traffic pollution danger to the health of children has grown fast in the last 3 years with the publication of research demonstrating the harm to children's' lungs and early death from lung and heart disease.

In the Richmond context this is reflected in the successful campaign to save the pedestrian bridge over the A316 to St Stephens school, with TfL agreeing to retain the bridge specifically on health grounds, in the face of evidence of health harm.

The Richmond Road past Marble Hill is a designated low pollution route and the base line average pollution level target has been met in the last year of records. It would be very hard to find another designated low pollution route within the correct population density well served by public transport.

There is a high chance therefore that a move to a new site would result in a loss of performance in meeting the Borough's own Policies on Health and Sustainability.

In addition to pure regulatory health needs the requirement that external and internal space should be therapeutic and health enhancing is unlikely to be achieved elsewhere.

3.0 The domino effect and actual site area demands.

The closure of other nurseries in the area pushes demand up on the survivors. The Borough's increase in population evidenced by the schools expansion programme indicates upward demand.

MHPG can only see a rise in demand for places a, for example Mandarin Duck Nursery has a waiting list.

The Otaker Klaus Music Trust needs a new site and in joining MHPG is increasing the need for floor area and land. Omitting OK Music Trust and Me too & Co from replacement and new site calculations gives a false picture on need

As a result the need is for land of similar size to the existing, 0.38 ha, same Use Class and at least an additional £2m of funds over and above the development costs on the English Heritage site at Marble Hill.

As English Heritage's letter of 6th March from Head of Commercial Services points out, income from the Playgroup is important for maintaining the House and Park asset, and its loss would work against community benefit.

4.0 Conclusion

The inevitable conclusion of this report is that a move to another site is not achievable, as necessary land and funds are unavailable, and the requirements of space, health and environment are unlikely to be met.

In addition the time frame would not be compatible with Marble Hill Playgroups efforts to survive.

A fast solution is very necessary which remaining in the current location achieves. In planning Policy terms it is the most pragmatic sustainable solution.

There is no realistic alternative to the proposal to rebuild.

References

Adventure Playgrounds: the essential elements. Play England

Managing Risk in Play Provision. Play England 2013

Early Years Design Brief Kent County Council 2013

English Heritage Letter 6th March to Katy Grieves