



10th May, 2019

Katy Grieves

Chair of Trustees of Marble Playcentres

Dear Katy,

Pre-planning advice, redevelopment of Marble Hill Playcentres

On behalf of the local planning authority, this letter sets out my observations on the redevelopment of the facilities at Marble Hill Playcentres.

Accessibility and local demand

The Playcentre facility, even if solely considering the outdoor elements, does not fit into the standard demand, accessibility and provision assessment that Richmond Council's Parks and Planning Policy teams undertake. This assessment covers free-to-use play areas in public open spaces that have no supervision and which are designed for everyday use on foot, reviewed against an accessibility standard of 400m for children under 5 and aged 5-11 and up to 800m for children aged 12 and over. The Playcentre is pay-to-enter and a supervised environment, perhaps more for weekly or occasional visits with journeys on foot, by bicycle, car or of short duration on public transport; from the information supplied, the catchment for the Playcentre is at least 4 kilometres, and further for at least a small percentage of users.

The supervision provided at the Playcentre creates an environment for children to experience challenge and learn risk assessment to a greater extent than at unsupervised playgrounds. The adventure play equipment is of a size and height that would not typically be provided in an unsupervised outdoor environment in a public park. The supervisory element also means children with additional needs, and their families, receive support, improving their own experience and integration with other children, and it is clear from the user survey that this SEND support is a particularly valued element of the facility. The planned integration with other SEND organisations on this site and further adaptation of the environment for children with SEN will only enhance this aspect.

It is therefore 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 a 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. Officers in Public Health or Achieving for Children may be able to provide further evidence in this respect, as may the user survey. The survey and a summary of the facility's provision relative to other providers should be included within any application.

For completeness, I have appended a map of the existing outdoor play provision in the borough from the Council's Open Space Assessment report, dated 2015. This uses an accessibility standard of 10 minutes to calculate areas of provision and deficiency. Using the 400m standard applied to planning applications under GLA policies, Marble Hill Playcentre does sit in a small area of deficiency between the Council-maintained play areas at Cambridge Gardens (14.1) and Orleans Gardens (59.1).

Alternative locations

At your request, I reviewed other potential locations for a similar facility of equivalent size to the existing and proposed facilities. 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 will not have the additional designations of Conservation Area and Other Site of Nature Importance, designations which may restrict design or require mitigation, dependent on the pre-planning guidance provided by other consultees. However, the redevelopment also offers opportunity to improve the existing site appearance and biodiversity value.

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.

You may therefore be able to demonstrate in any subsequent application that alternative locations would be of equal landscape sensitivity and of low financial viability.

Yours sincerely,

A handwritten signature in black ink that reads "Steve Marshall". The signature is fluid and cursive, with a large initial 'S' and a stylized 'M'.

Steve Marshall

Director

e: steve.marshall@wildfuture.co.uk

d: 07585 772185

LONDON BOROUGH OF RICHMOND UPON THAMES OPEN SPACE ASSESSMENT

Figure 7.1: Provision for children and young people mapped against analysis areas

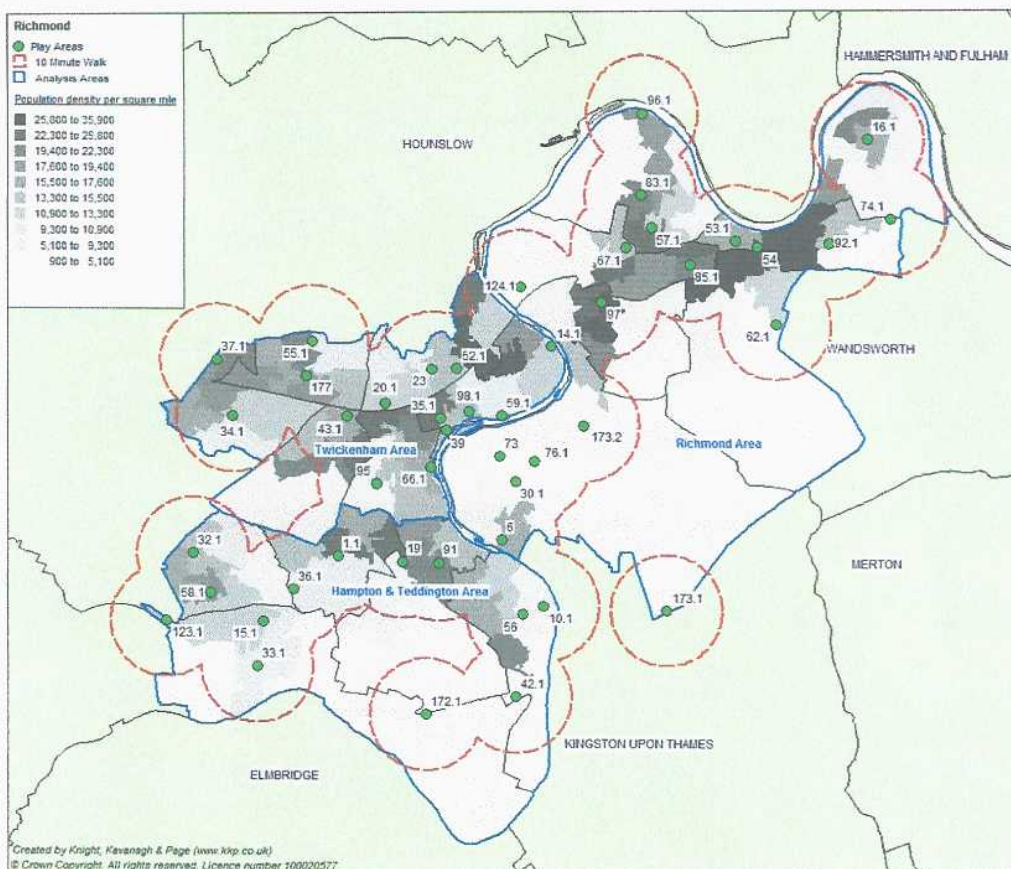


Table 7.3: Key to sites mapped

Site ID	Site name	Analysis area	Quality score	Value score
6	Beaufort Court Playground	Richmond		
19	Church Road Play Area	Hampton & Teddington		
23	Grimwood Road Recreation Ground	Twickenham		
39	Jubilee Gardens (Twickenham)	Twickenham		
54	Mullins Path Open Space	Richmond		
56	Normansfield Play Park	Hampton & Teddington		
73	Riverside Drive Playground	Richmond		
91	Vicarage Road Play Area	Hampton & Teddington		
95	Wellesley Road Play Area	Twickenham		
97	Worple Way Recreation Ground	Richmond		
1.1	Alpha Road OS Play Area	Hampton & Teddington		
14.1	Cambridge Gardens Play Area	Twickenham		
15.1	Carlisle Park Play Area	Hampton & Teddington		
16.1	Castelnau Recreation Ground Play Area	Richmond		

LONDON BOROUGH OF RICHMOND UPON THAMES OPEN SPACE ASSESSMENT

Site ID	Site name	Analysis area	Quality score	Value score
98.1	Champions Wharf Play Area	Twickenham		
20.1	Craneford Way Recreation Ground Play Area	Twickenham		
177	Cypress Avenue Play Area	Twickenham		
30.1	Ham Village Green Play Area	Richmond		
32.1	Hampton Common Play Area	Hampton & Teddington		
33.1	Hampton	Hampton & Teddington		
123.1	Hatherop Recreation Ground Play Area	Hampton & Teddington Area		
34.1	Heathfield Recreation Ground Play Area	Twickenham		
35.1	Holly Road Garden Of Rest Play Area	Twickenham		
36.1	Holly Road Recreation Ground Area	Hampton & Teddington		
37.1	Hounslow Heath Play Area	Twickenham		
42.1	Kings Field Play Area	Hampton & Teddington		
43.1	Kneller Gardens Play Area	Twickenham		
10.1	Broom Road Recreation Ground Play Area	Hampton & Teddington		
52.1	Moormead & Bandy Recreation Ground Play Area	Twickenham		
53.1	Mortlake Green Play Area	Richmond		
55.1	Murray Park Play Area	Twickenham		
57.1	North Sheen Recreation Ground Play Area	Richmond		
58.1	Nursery Green Play Area	Hampton & Teddington		
124.1	Old Deer Park Play Area	Richmond		
59.1	Orleans Gardens Play Area	Twickenham		
62.1	Palewell Common Play Area	Richmond		
66.1	Radnor Gardens Play Area	Twickenham		
67.1	Raleigh Road Recreation Ground Play Area	Richmond		
74.1	Rocks Lane Recreation Ground	Richmond		
76.1	Sandy Lane Recreation Ground Play Area	Richmond		
83.1	St. Lukes Open Space Play Area	Richmond		
85.1	Tangier Green Play Area	Richmond		
92.1	Vine Road Recreation Ground Play Area	Richmond		
96.1	Westerley Ware Recreation Ground Play Area	Richmond		

There is generally a good spread of provision across the Borough. In addition, the greatest areas of population density are within walking distance of a form of play provision. The areas of low population density not covered by catchments are the two Royal Parks located in the Borough.