

**Marble Hill Community Project**  
on behalf of Marble Hill Playcentres, Skylarks & the Otakar Kraus Music Trust

site: One O'Clock Club  
Richmond Road  
Marble Hill Park  
Twickenham  
TW1 2NL

23 April 2021

Kreena Patel  
**Senior Planner**  
Serving Richmond and Wandsworth Councils  
Development Management  
Environment and Community Services

Ref: 21/0847/FUL

Dear Kreena,

On behalf of the Marble Hill Community Project, please find below additional information relating to the planning application at the above site. This information follows and responds to a number of comments received during the consultation process.

An application was submitted on 8 March 2021 for full planning application at the above site. The proposal comprises the demolition of the existing buildings and erection of a new building for use as a children's play space, nursery and community hub (Class E(f), Class F2), installation of landscaping and associated works.

Since this time, we have taken account of consultation responses received from local residents and discussions with those residents, and we would like to offer our responses to their comments. There have also been some requests for additional drawings, but this application has included all required documentation which has been reviewed with planning officers.

### **Response to Consultation Comments from the Local Community**

Martin Habell, architect of the proposal drawings, has submitted a report addressing the comments made. This report is attached and covers comments regarding:

- 1. MOL and Loss of Green Area**
- 2. Building Size**
- 3. Noise**

- 4. Loss of View**
- 5. Proximity**
- 6. Potential Loss of Light**

In addition, we would like to address comments regarding other aspects of the proposal. Namely:

#### **7. Purpose of the development**

Comments have been made by local residents regarding the nature of the proposal and the intent of the organisations making the application. These include comments on:

- **Commercial activities**

Commercial trading or subletting is not intended, is not a use applied for, and can be controlled by Planning Conditions. The scheme is described by Nos 20 and 27 Beaufort Road as a “Trojan Horse” and they question the charitable orientation and qualification of the team and the intended use.

The scheme has had the utmost professional involvement, much of it by local people and professionals volunteering. The intended users can be checked on charitable status, and the designer qualifications are verifiable and contained in the report. The draft Community Use Agreement demonstrate the intended uses, which is supported by English Heritage, the landowners, and Planning Conditions can ensure its charitable use. The project manager is a local parent and has both volunteered time and worked on a nominal hourly rate to support the project coordination (and is paid as part of the fundraising efforts of the project.) She is an active member of the community as a school governor, PTA chair and member of the St Margarets Fair committee. There is no commercial involvement from this perspective.

- **Loss of child-centred play**

One comment refers to a loss of child-centred play, but this proposal ensures precisely the opposite. The renewal of the Adventure Playground and One O'Clock Club are needed to ensure the longevity of a much-loved site, and the intent is to make sure the outdoor space retains its "adventurous" and unique character whilst allowing this child-centred play to continue throughout the year. The development would ensure that local children are able to access this facility all year round, and not just in the summer months. Play in winter could be outdoor/indoor if there was space to do so - a key element of this proposal.

The wide support we have received from across the local community demonstrates the value this site has, and the landscape proposal includes elements and suggestions that have come from a survey of over 800 local site users, e.g. water play, climbing wall, etc were all suggested by parents and children as welcome additions to the site.

- **Unnecessary facility**

A comment from 34 Beaufort Road suggests the facility is not needed. The submitted reports demonstrate a shortage of play areas, especially ones as unique as this, a lack of alternative venues, and particularly a lack of local resources for families with special needs. This is also evidenced by community-wide letters of support and need online.

## **8. Increased usage and impact on Noise, Parking, Traffic**

Comments also addressed increased usage of the site (including the number of users at any one time, extended use throughout the year and extended daily hours) and the impact on noise, traffic and parking facilities.

- **Usage:**

It should be noted that the proposed development is intended to serve the site's existing users and the existing users of Skylarks (who are already on site at least once a week) and the OKMT. Any increases in usage are around expanding access during the year, so that users can access the space in the winter months - though in fact, the Mandarin Ducklings Nursery is already using the space in winter so there are already some users on site. Both OKMT and Skylarks hope to increase the number of days they operate which would allow them to reach more people, but this does not imply a large increase in users on any particular given day. E.g.: Skylarks currently provide services across two days at the Crossway Centre and have multiple activities running simultaneously which can be overwhelming for their client base. They envision instead increasing the number of days they operate but spreading the activities out, so the usage will be better spread out evenly across the whole week rather than at any one given time.

For both Skylarks and OKMT, there is a limited capacity on activities due to the amount of support needed for children with additional needs to access their services. Small group sizes are generally preferred for that type of work and this will not change with moving to a new venue (this development.)

The Playcentres groups (Adventure Playground and One O'Clock Club) already have user caps in place and the overall site space will not change, so there is no increase in user capacity envisaged. The user capacity of AP and OOC is managed by the Playcentres during opening hours and controlled by the workers on site.

- **Noise**

Bearing in mind the comments made above around the usage of the site, it is not expected that the noise levels would increase as a result of increased usage. Furthermore, the proposal endeavours to reduce external play noise: The current playcentre below and beyond Beaufort Lodge and Road has large expanses of concrete on the ground, concrete tile roofs and brick walls. These tend to amplify noise and direct it out of the site.

The proposed building form and materials in convex planted curved roof and timber shingle walls is intended to improve upon the current acoustic situation. The proposals have soft planted roofs which are intended to be far less noise reflective, as they will act as sound absorbers, and being curved, dissipate noise reflection. As a roof this surface is over what is currently concrete. Further measures include specified acoustic ameliorating sealed windows with obscure glazing.

The increase in floor space provides more opportunity for children to be inside, particularly the age group using the adventure playground.

Regarding Noise of singing in grounds:

Singing would be a compliant use currently were it to take place. There is no planned external singing and the mention of "concerts" in planning documentation refer to the work of OKMT, e.g.: small groups of children presenting their work to families and friends or the OKMT Choir performing (See [https://www.okmtrust.org.uk/what-we-do/youth-choir/.](https://www.okmtrust.org.uk/what-we-do/youth-choir/)) This is a sporadic activity that would only take place during agreed opening hours.

- **Opening Times**

Opening hours are set and controlled by park opening times. It will also be controlled by planning conditions.

- **Traffic and Parking**

Comments received referred to a potential increase in parking on site. Professional traffic experts have provided studies that link to the earlier studies of projected use of the completed Marble Hill Revived scheme, and no significant change to the projected main daily traffic (for opening times) is anticipated given

1/ the local nature of Skylarks (at the St Stephens Crossway Centre around the corner)

2/ the relatively small number of additional users from OKMT (who are also local). The special needs users are primarily small groups or activities like 1:1 music therapy.

The report demonstrates from a survey taken that the majority of existing users approach on foot (85-90%). Considering the site exhibits excellent accessibility credentials including frequent bus services, the impact on traffic is considered to be minimal.

## **Conclusion**

In conclusion, the application addresses all of the concerns of the residents who have provided comments. Overall, the development is considered to be high quality and will provide the following benefits:

- Renewal and improvement of a much-loved existing site ensuring its longevity
- The ability to provide play, music and special needs support to users year-round
- Increased community benefits for child care, early years education with an improved nursery space
- Priority resources for SEND families
- Increased play opportunities for low-income families.
- A building that will be a flagship for special needs, for bringing together the all community groups and for environmental/sustainable design

We hope this helps answer your comments and look forward to continuing to liaise with you.

Sincerely,

Caroline Green  
Project Director for the Marble Hill Community Project