

28 January 2022
(via email)

Dear Ms Thatcher

The Twickenham Riverside Trust (TRT) would like to make the following representation to the Planning Department regarding the replacement play space on Planning Application 21/2758/FUL, which is being presented as larger than the play area in the existing Diamond Jubilee Gardens.

The proposed replacement play space is not planning compliant on two counts:

1. the replacement's area does not match that which is available on the existing site
2. the proposed play area does not provide the extra c.150m² required by the 'child yield' of the proposed development.

There are at present two play areas (aside all the opportunities for incidental play) on the Diamond Jubilee Gardens (DJG), both of which are situated within the Trust's demise, which is subject to the 125-year lease granted to the Trust in 2014.

PLAY SPACE MEASUREMENT COMPARISONS

The enclosed playground in the present Gardens measures 430m². This consists of c. 350m² of play area, with a formerly planted border of c.80m²:

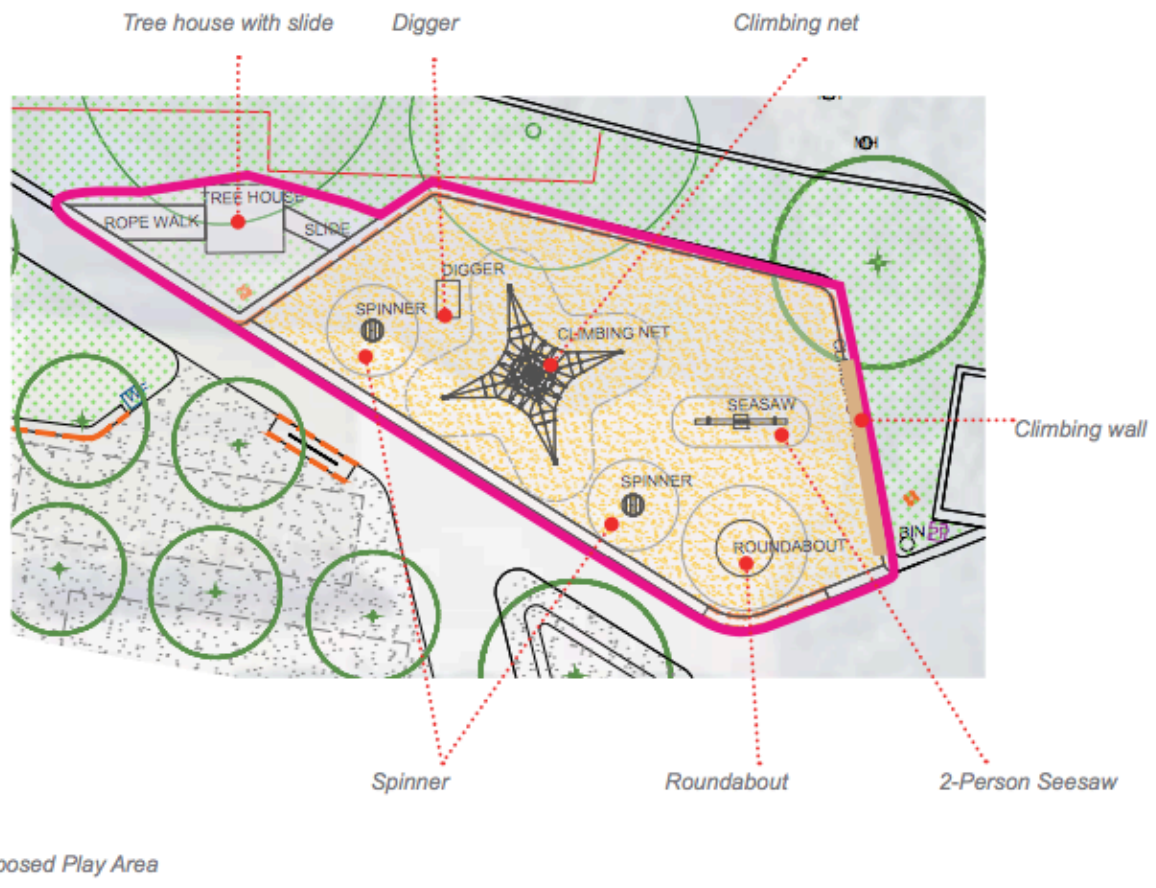


However, the Landscape and Public Realm Strategy in the Council's development proposal measures only the spongy area within the existing playground/play area:



Using this 'definition' of the playground/play area, according to the Landscape and Public Realm Strategy, the existing playground covers an area of just 187m². However, this measurement does not take into account any of the seating areas or the safe runaround/incidental play area within the enclosed playground.

In contrast, when providing the measurement of the new playground/play area in the planning application, the measurement provided does take into account seating and the runaround/incidental play area:



The proposed playground/play area, according to these 'enlarged' criteria, has an area of 343m².

The use of different methods of measurement is clearly both misleading and inequitable.

'CHILD YIELD' REQUIREMENTS ARISING FROM THE PROPOSED DEVELOPMENT

The Planning Application Planning Statement notes:

7.59 According to the GLA's Population Yield Calculator, the Proposed Development is required to deliver 148.6 sqm of on-site children's play space to provide for the child yield from the new residential apartments. The requirement for the uplift is in addition to a requirement to replace the existing 187 sqm of play space. This creates a total play space requirement for the Proposed Development of 335.6 sqm.

7.60 The Proposed Development will provide 343 sqm of dedicated children's play space on-site, which equates to 7.4 sqm overprovision of children's play space.

However, if one measures the existing playground/play area using the same parameters (i.e. including seating and runaround/incidental play areas) as the proposed, then the

proposed playground falls short of not only delivering a replacement area but also of providing the additional area required by the development's 'child yield':

Existing enclosed playground/play space (350m²) + allowance for child yield (148.6m²) = 498.6m²

Proposed play area = 343m²

Shortfall = 498.6 - 343 = 155.6m².

In order to be planning compliant, the proposed playground/play area should be almost 45% (or 155.6m²) larger than what is being proposed.

THE SANDPIT

The above calculations do not take into account the separate sandpit in the existing Diamond Jubilee Gardens.

This sandpit covers an area of c.68m² and has been in use since 2016. It was recently (Autumn 2021) refurbished by Richmond Council.

If the sandpit play area is applied to the required re-provision, this results in an even greater shortfall of replacement play space of **155.6 + 68 = 223.6m². i.e. the proposed play area needs to be c.65% larger in order to be policy compliant.**

SUMMARY

proposed (excluding 'child yield' uplift):

Existing play area = 350 (playground) + 68 (sandpit) = 418m²

Proposed play area = 343m²

Shortfall = 75m² (22%).

proposed (including 'child yield' uplift):

Existing play area (418) + uplift required by child yield (148.6) = 566.6m²

Proposed play area = 343m²

Shortfall = 223.6m² (65%).