

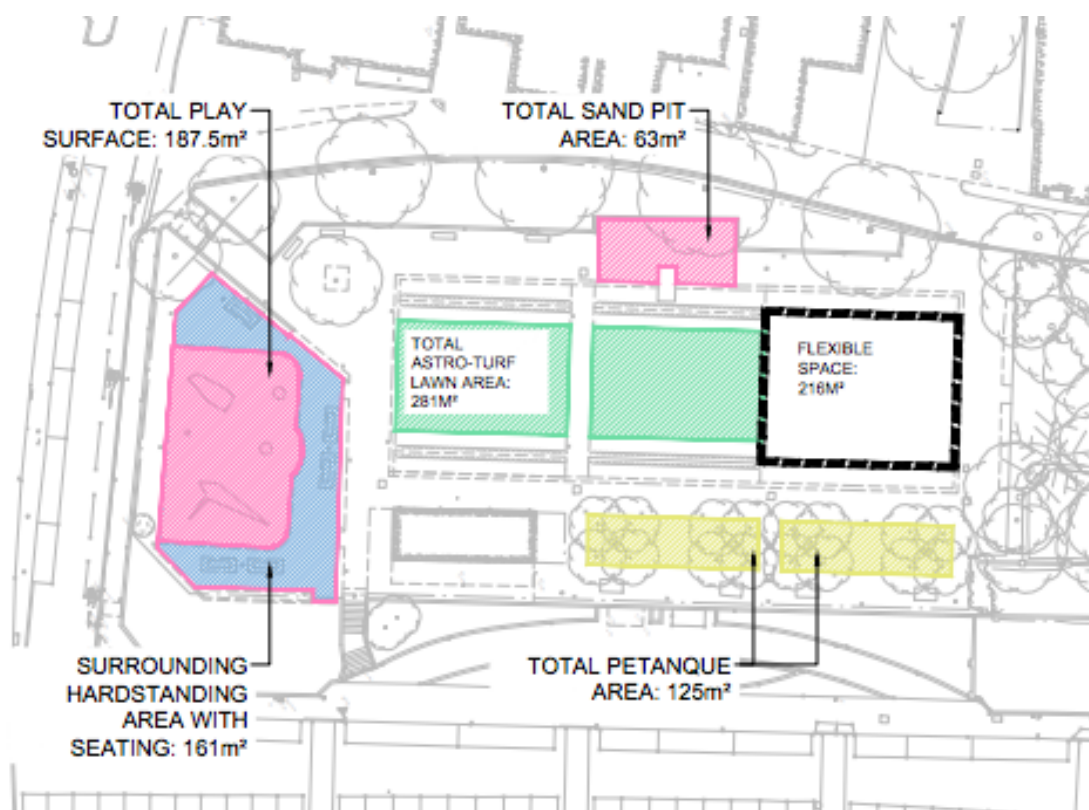
22nd November 2022  
(via email)

Dear Ms Thatcher,

**With reference to Planning Application 21/2758/FUL, Landscape and Public Realm Strategy pt 1, pp33-34: Strategies Play**

The Twickenham Riverside Trust would like to add to its Objection of January 2022 (included at the foot of this document for your convenience).

Page 33:



Existing playground: the above diagram describes 161m2 of the enclosed children's play area as "surrounding hardstanding area with seating", and does not include it in the total of

the existing play provision. This completely ignores its existing function as play space in the enclosed playground, as outlined in the Trust's Observation of January 2022 (reproduced below). Play space is not defined by surface material, but rather by function. This "hardstanding area" functions as play area within the enclosed playground.

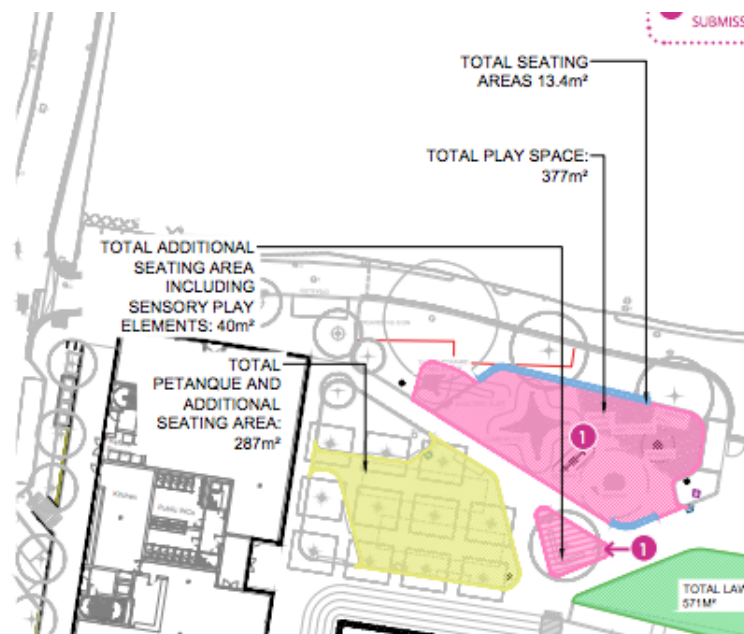
The existing playspace provision within the enclosed playground (using the Applicant's measurements) is therefore  $187.5\text{m}^2 + 161\text{m}^2 = 348.5\text{m}^2$ . For the purposes of comparison with the proposed playground, an area of  $10\text{m}^2$  (a generous allowance for the footprint of the five benches in the existing enclosed playground) is subtracted from the existing play area to give a net area of  $338.5\text{m}^2$ .

Combined with the existing sandpit area of  $63\text{m}^2$ , this gives a combined existing 'formal' play area of  $401.5\text{m}^2$ .

The proposed play area has a GLA uplift requirement (to accommodate residents of the proposed residential development) of  $148.6\text{m}^2$ .

Accordingly, the proposed development is required to provide  $401.5 + 148.6 = 550.1\text{m}^2$ .

Page 34:



The proposed play area totals  $377 + 40 = 417\text{m}^2$ .

**This proposed area falls short of the required play area by  $133.1\text{m}^2$  ( existing  $550.1\text{m}^2$  - proposed  $418\text{m}^2$ ), or 24%.**

The above is an assessment based on m2 only. It does not include the considerable and immeasurable benefit to children of being able to play freely and safely within an enclosed area.

## INFORMAL PLAY

There are many opportunities for informal play within the existing Diamond Jubilee Gardens. This all takes place within a space which is largely enclosed, and entirely free from direct, and protected from adjacent, vehicular movement.

The central area with an artificial grass surface (281m<sup>2</sup>), as well as being used for seating and picnicking by all ages, is also used extensively for play, especially ball games (to include football, tennis and cricket).

It should also be noted that this artificial grass area is used daily during the week by nearby nurseries, for both organised and free play activities, as it is 'enclosed' by the surrounding hedges as well as being located within the wider enclosed area of the Gardens. The Trust made reference to this in its January 2022 representation on the existing use of this area, and in its wider Observation about the proposed Embankment Event Space, which is also the subject of a further October 2022 representation.

To return to play space: in contrast, there is no provision for ball games on the proposed reprovided Gardens. The proposed lawn area (described on p34 as "flexible lawn space with playful sloped terraces") is totally unsuitable for ball games. As well as being fragmented into three areas separated by "playful" slopes, over 60% of this unenclosed area is adjacent to the Embankment servicing area for Eel Pie Island, where it is proposed that vehicles execute reversing manoeuvres and multi-point turns in the road in order to exit the Embankment via Water Lane. Any play, be it with balls or not, will need to be carefully supervised by adult carers. This is in contrast to the 'free' (i.e. lightly supervised) informal play allowed by the existing lawned - and hard-standing - provision within the Diamond Jubilee Gardens.

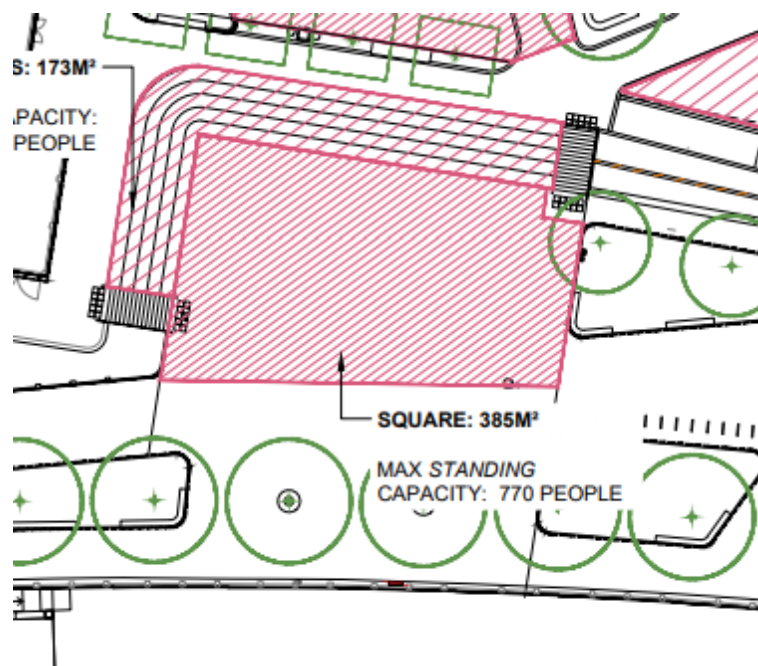
The area of hardstanding measuring 216m<sup>2</sup> adjacent to the artificial grass area in the existing Diamond Jubilee Gardens is described in the application as "flexible space". As mentioned above, this is also a much used play space, used not only for ball games, but also for scootering and roller blading/skating.

It should be noted that, in contrast to the equivalent space on the planning application (the “event space” located on the Embankment), this area is neither a main pedestrian route or nor a main cycle route.

The revised October 2022 drawing “Event Space” now shows an ‘Event Space’ or “Square’. This is being proposed as equivalent to the existing hard standing (labelled ‘flexible space’) in the Diamond Jubilee Gardens. However, it lacks, the Trust would argue, the amenity value/extendable usage of being contiguous with other play spaces.

It is also, most significantly, adjacent to a main pedestrian/cycle route, with a secondary pedestrian route running through it:

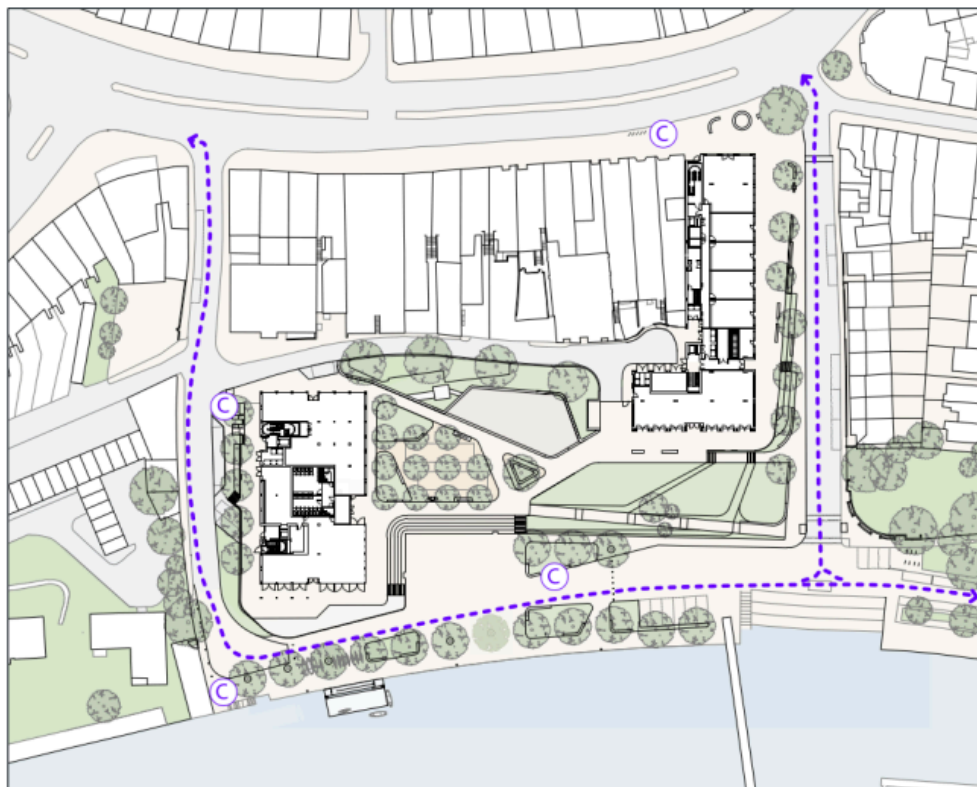
“Event Space” (October 2022 drawing):



Page 31 (“Strategies - Pedestrian movement” Landscape and Public Realm Strategy pt 1):



**Figure 4-4 - Cycle movement and access concept through the site (source: Hopkins)**



This proposed 'Event Area'/'Square' is clearly also suitable for scootering and roller blading/skating, though not ball games as it adjacent to the river. However, children enjoying free play in this area will not have had sight of the October 2022 drawing, which delineates the proposed area of activity. The potential for conflict with cyclists - this latter also having the 'designed-in' potential for conflict with pedestrians - is clear.

## **SUMMARY**

**The proposed play area/spaces, in contrast with the existing, are of reduced amenity value, both in terms of m2 and usage. The planning application is therefore non-compliant with planning policy, and the Trust urges the LPA to reject it accordingly.**

With my best wishes,

Ted Cremin

*Chair, Twickenham Riverside Trust*



## **PREVIOUS REPRESENTATION DATED 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.150m<sup>2</sup> 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 430m<sup>2</sup>. This consists of c. 350m<sup>2</sup> of play area, with a formerly planted border of c.80m<sup>2</sup>:

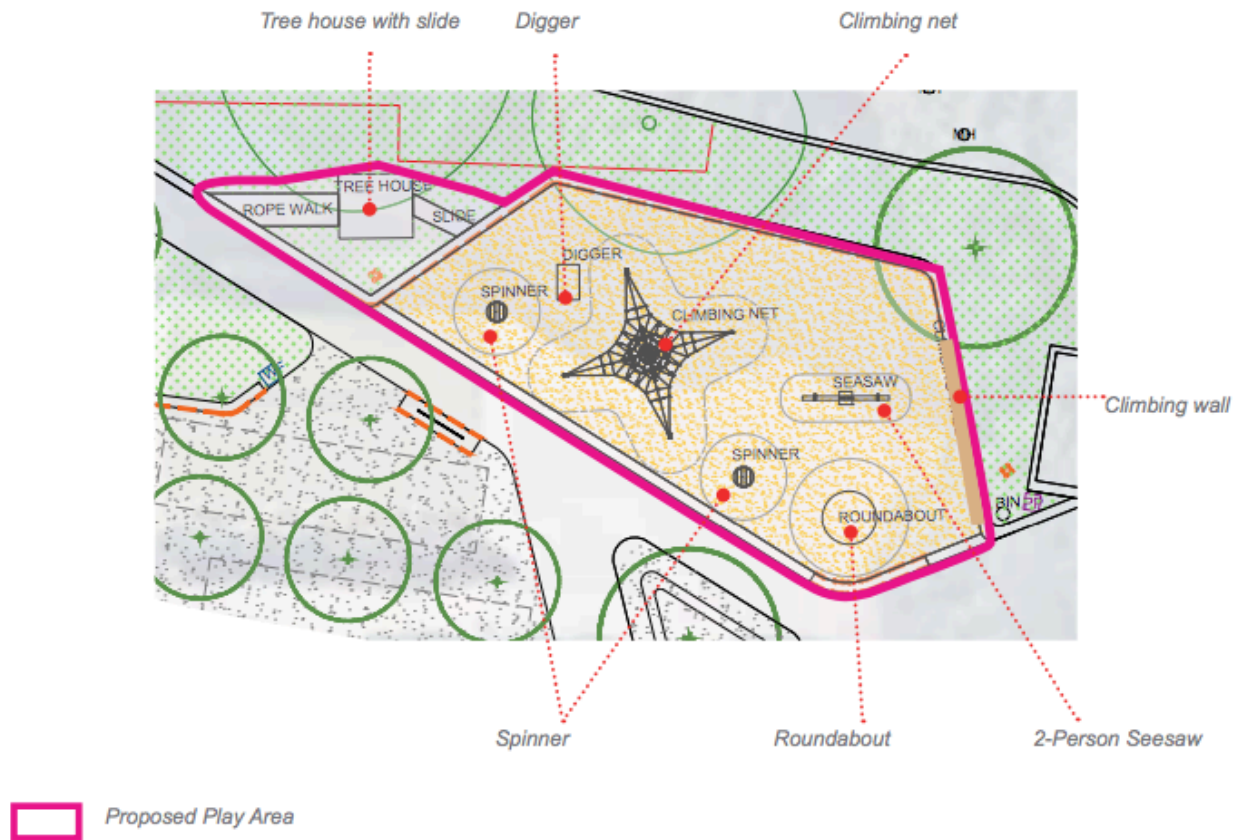


However, the Landscape and Public Realm Strategy in the Council's development proposal measures only the spongy area within the existing playground/play area:



Using this 'definition' of the playground/play area, according to the Landscape and Public Realm Strategy, the existing playground covers an area of just 187m<sup>2</sup>. 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 343m<sup>2</sup>.

**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 (350m<sup>2</sup>) + allowance for child yield (148.6m<sup>2</sup>) = 498.6m<sup>2</sup>

Proposed play area = 343m<sup>2</sup>

**Shortfall = 498.6 - 343 = 155.6m<sup>2</sup>.**

**In order to be planning compliant, the proposed playground/play area should be almost 45% (or 155.6m<sup>2</sup>) 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.68m<sup>2</sup> 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 reprovision, this results in an even greater shortfall of replacement play space of **155.6 + 68 = 223.6m<sup>2</sup>. 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) = 418m<sup>2</sup>

Proposed play area = 343m<sup>2</sup>

Shortfall = 75m<sup>2</sup> (22%).

**proposed (including 'child yield' uplift):**

Existing play area (418) + uplift required by child yield (148.6) = 566.6m<sup>2</sup>

Proposed play area = 343m<sup>2</sup>

Shortfall = 223.6m<sup>2</sup> (65%).