

Comments on Convoys Wharf RMA DC/19/111912 Convoys Wharf Plot 15 (Phase 1) Children and Young People's Play and Informal Recreation

A. Convoys Property Ltd (CPL) Stated Play Strategy

The question 'Where do the Children Play?' has been raised consistently during public meetings and exhibitions regarding Convoys Wharf, but no clear answer to this question has been given. There has been either an inability or a reluctance to spell out where play spaces have been allocated within the Convoys Wharf site. Nor has there been any clear admission on the part of the developers of their reliance on local parks. They did not respond to the question of whether there has been any consultation about their strategy with current users and those responsible for these parks.

The **Community Consultation Statement** gives the clearest description to date of the Play Space Strategy of CPL:

A Play Space Strategy has been included within the agreed outline planning permission. The strategy aims to offer play space to children at a range of ages.

Play space will come forward throughout each phase of the development and include:

- *Doorstep play space for 0-5-year olds within communal courtyard areas;*
- *Play facilities for children aged 5-11 within publicly accessible open spaces;*
- *Safe and accessible routes to existing play and social spaces for the children aged 12+.*

There is no mention of this play strategy within the OPP or Section 106 Agreement.

CPL say that the Play Strategy has been included within the agreed outline planning permission. This is not the case. Nowhere in either the OPP or S 106 documents have we found mention of this play strategy. The OPP requires that play and recreation spaces for children and young people be agreed at the detailed application stage.

See:

GLA Planning report D&P/0051c/02 Convoys Wharf, Deptford, SE10 30 October 2013 in the London Borough of Lewisham planning application no. DC/13/83358

*102 Policy 3.6 of the London Plan sets out that development proposals "...should make provision for play and informal recreation space..". The detailed level of assessment of these aspects will have to come at the **detailed planning application stage**. The site does benefit from existing provision of open space in close proximity to the site and the masterplan proposes to integrate the site into that network. **The S106 Draft Heads of Terms contains a commitment to provide play space on a phased and plot basis but this is not detailed further.** There is also a S106 provision for **up to £100k to improve connections to Pepys Park**, again this is welcomed and **both of these elements will need to be carefully managed at the detailed application stages.***

OPP Reconciliation Statement 8 (ii) (c)

(ii) The Development Table element of the Reconciliation Document shall include details of the following for items (1), (2), (3) and (4) referred to in part (i) of this Condition:

c) The amount (m2) of private residential amenity space, communal residential amenity space (including play space), publicly accessible open space and living roofs;

OPP Conditions to be discharged prior to commencement of the development 20.(i)

(f) Reserved Matters / approval of details

20.(i) Development other than works approved under Condition 21 shall not commence in a Phase or Sub-Phase or Plot approved under Condition 22 until layouts, plans, sections, elevations and other supporting material for that Phase. Sub-Phase or Plot detailing:

(f) Hard and soft landscaping and planting, site boundary treatments of all publicly accessible open space and all private open space (including play space, private residential amenity space and communal residential amenity space);

The stated strategy is unacceptable for a number of reasons, which we have set out below.

B. Plot 15 RMA Planning Documents

The playing out of this strategy appears in the various planning documents.

1. Design Statement

In the Design Statement, Paragraph 8.2.3 Play Provision it is stated:

Play area provision is in accordance with GLA guidance. The total required playable area for Plot 15 is 362 sq. m (standard of 10 sq. m per child) considering that play provision for children 5-11 and 12+ is accommodated off site.

The under 5 'doorstep play' provision is integrated into the overall design for the communal amenity space and consists of natural play elements suitable for young children.

Natural stone boulders emerge from the 'dry riverbed' creating stepping stones and niches for drought tolerant grasses and perennials. The colours, textures, sounds and smells create an immersive for small children. The flowing forms of sculptural seating brings additional play value to the garden by creating an undulating walkway through sensory planting.

Timber features stand like ship's masts along the southern boundary beneath the retained trees, whilst open areas of multifunctional lawn provide further flexible space for play and picnics.

2. Planning Statement

a. 6.0 Assessment of Reserved Matters - Proposed Uses

All residential units have access to accessible private usable external space, including secure communal children's play space at ground floor.

b. Open Space and Private Amenity Landscaping

6.33 The Development will also accommodate children's play space on site in line with the Mayor's adopted Supplementary Planning Guidance, 'Providing for children and young people's play and informal recreation' (accessibility to play space).'

C. Policies on Play and Informal Recreation

1. Allocation of a *minimum* of 10 sq. m. of play space per child

The policy gives 10 sq m as a *minimum* required area of play space per child. It is not a fixed amount. Developers are at liberty to provide more space and should be encouraged to do so.

See:

SPG Children and young people's play and informal recreation 4.16

*4.16 Existing national standards (see appendix 1) are too high for practical application in London. London boroughs have as a consequence been using a more realistic and achievable figure as a benchmark standard for London since the first publication of the Mayor's SPG on Providing for Children and Young People's Play and Informal Recreation in 2008. This benchmark standard recommends a **minimum of 10 sq m of dedicated play space per child** as a basis for assessing existing provision within an area.*

2. Calculating Child Occupancy Rate

The calculation for estimating the number of children (child occupancy rate) is provided by a 'Child Yield Calculator'. Appendix 2 of the SPG, Child Occupancy of New Housing Methodology, gives *one* example based on interim figures worked out prior to the 2011 census figures. There are other more up to date methods of calculation.

The total required playable area for Plot 15 at 362 sq. m provides for 36 children in a plot with 124 flats from 1 to 4 bedrooms. Compare this with Plot 08 with 14 children in 456 1 and 2 bedroom flats. There is an obvious discrepancy in the calculation.

It is clear to anyone who looks into it, that this sample calculation, which is in common use by developers, underestimates the number of children forecast, especially for families in privately owned housing.

Policy 3.6 Planning decisions 3.6 B

*B Development proposals that include housing should make provision for play and informal recreation, **based on the expected child population generated by the scheme and an assessment of future needs.** The Mayor's Supplementary Planning Guidance Providing for Children and Young People's Play and Informal Recreation (SPG) sets out guidance to assist in this process.*

SPG Children and young people's play and informal recreation 4.24

*4.24 It is recommended that the benchmark or the locally derived standards should be applied to the forecast child population of the area. The proposed benchmark standard of a **minimum** of 10 sq.m. per child **regardless of age** is recommended as a basis for assessing future requirements arising from an increase in the child population of the area.*

3. Provision of on-site play facilities

In large developments, the norm is to provide play facilities on-site.

See:

SPG Children and young people's play and informal recreation 1.10 & 3.41

1.10 Developers and consultants are largely responsible for the delivery of child-friendly developments and public spaces, and they must ensure adequate size, design and access to new and improved play and informal recreation areas.

*3.41 New development including housing should make provision for play space. This should **normally be made on-site** and in accordance with LDF play policies for the area. **Where development is to be phased, there should be early implementation of the play space.***

CPL has a responsibility to allocate space for children of all ages on-site.

In the **Design Statement** for Plot 15, Paragraph 8.2.3 Play Provision it is stated:

Play area provision is in accordance with GLA guidance. The total required playable area for Plot 15 is 362 sq. m (standard of 10 sq. m per child) considering that play provision for children 5-11 and 12+ is accommodated off site.

This number is a calculation of under 5's. CPL has proposed to provide play space only for the under 5 year old in the residents' private communal areas and for all other children to play off-site, therefore the total number of children of all ages is underestimated, on top of a calculation which has an inbuilt underestimation of the children who will potentially live there.

4. Off-site provision

According to the SPG, off-site provision **may** be acceptable only where it can be demonstrated that it fully satisfies the needs of the development whilst continuing to meet the needs of existing residents.

See:

SPG Children and young people's play and informal recreation 3.41

*3.41 (cont.) Off-site provision, including the creation of new facilities, improvements to existing provision, and/or an appropriate financial contribution towards this provision **may** be acceptable **where it can be demonstrated that it fully satisfies the needs of the development whilst continuing to meet the needs of existing residents.***

In addition, the existing provision should have excess capacity or be capable of enhancement from the new development. Only then the 10 sq m minimum need not be applied.

*4.25 If there is the opportunity from the new development to access **existing provision that has excess capacity or is capable of enhancement from the new development**, the benchmark standard of 10 sq m per child does not need to be applied.*

Has it been demonstrated that the needs of all the children living in the development have adequate play space and the existing resident children who already have access to this space are not crowded out? Without setting out to demonstrate this, it is not possible to say whether it is permissible to use the local parks and play areas.

An indication of the answer was provided in the original comments on the 2013 planning application. For example, the Chairman of the Twinkle Park Trust objected to the scheme 'due to the unsustainable burden that it would place on open space at Twinkle Park and Charlotte Turner Gardens'. The Tenants Action Group (Pepys Estate) stated that it objected to the application on grounds including 'ineffective consultation/engagement by the developer; lack of response to community aspirations and ideas; lack of recognition of site history; lack of on-site communal areas and children's play space and disturbance to Pepys Park through a proposed new access route with the site'. Have views changed since then?

Twinkle Park management have recently redeveloped the pond area and during 2010/11, Lewisham Council spent almost £3 million on improvements to six public parks in and around the Pepys estate of North Deptford, including Pepys Park, in consultation with the local community. See Lewisham Play Areas Pepys Park <https://lewisham.gov.uk/inmyarea/regeneration/improvements-to-parks/~link.aspx?id=F4552DFFB0BB44AA8C383AC8FFDB774E&z=z>

CPL have plans to make changes in Pepys Park. Who of the local community knows specifically what this involves? Will there be any consultation? Will any consultation include children and young people?

5. Responsibility of Boroughs

As required by Policy 3.6 of the London Plan, LB Lewisham has undertaken an audit and produced strategies on Play and Informal Recreation which can act as guidance for CPL and other developers. Its strategy on Children and Young People's Recreation follows the London Plan guidance and has been adopted in the Planning Obligations SPD 2015 Section 3.7.

The Lewisham Leisure and Open Space Study (2010) states that there was 1.51 sq m of play space per child in Lewisham, equating to 8.49 sq m less than the figure recommended by the Mayor of London. LB Lewisham and that the Council will expect all new major developments to provide children's play space provision in line with London Plan Policy 3.6.

Bearing in mind that the standard is a *minimum* of 10 sq m, the figure of 8.49 sq m is also a minimum shortfall in play provision per child, it is imperative that LB Lewisham abides by its policy and ensures that CPL provides the minimum space on site for all the children who will live in the development at Convoys Wharf.

If the Council deems, according to Planning Obligations SPD 2015 3.7.5, that there are exceptional circumstances and it is not possible for a development to meet children's play space requirements on-site, then a survey should be carried out to determine that there is sufficient play space for the existing local children before approving use of the surrounding parks and if not, more spaces should be provided.

See:

London Plan Policy 3.6 C, LDF preparation

C Boroughs should:

a undertake audits of existing play and informal recreation provision and assessments of need in their areas, considering the qualitative, quantitative and accessibility elements of play and informal recreation facilities

b produce strategies on play and informal recreation supported by LDF policies to improve access, safety and opportunity for all children and young people in their area.

Planning Obligations SPD 2015 3.7.3

3.7.3 The Lewisham Leisure and Open Space Study (2010) details the existing ratio of children's play space to the child population in the borough. Currently there is 1.51 m² of play space per child in Lewisham, equating to 8.49 m² less than the figure recommended by the Mayor of London. Planning obligations will not be used to address existing deficiencies in provision; rather this information is provided to emphasise the importance of delivering an acceptable level of play space alongside new development. The Council will expect all new major developments to provide children's play space provision in line with London Plan Policy 3.6.

3.7.5 It is preferable to the Council for developers to, wherever possible, directly provide well designed children's play space on-site in accordance with the policy requirements. Where the Council deems that there are exceptional circumstances and it is not possible for a development to meet children's play space requirements on-site, a financial contribution will be necessary.

6. Age Appropriateness

CPL's Play Strategy states:

Play space will come forward throughout each phase of the development and include:

- *Doorstep play space for 0-5-year olds **within communal courtyard areas**;*
- *Play facilities for children aged 5-11 within **publicly accessible** open spaces;*
- ***Safe and accessible routes to existing play and social spaces** for the children aged 12+.*

This is a corruption of the types of play spaces defined in the SPG Glossary, altered to suit the proposals for Convoys Wharf.

See:

SPG Glossary

Dedicated play space can fall under the following typology:

Doorstep playable space: *a landscaped space including engaging play features for young children under 5 that are close to their homes, and places for carers to sit and talk.*

Local playable space: *a landscaped space with landscaping and equipment so that children aged 0 to 11 can play and be physically active and they and their carers can sit and talk*

Neighbourhood playable space: *A varied natural space with secluded and open areas, landscaping and equipment so that children aged 0 to 11 can play and be physically active and they and their carers can sit and talk, with some youth facilities for young people over 11.*

Youth space: *A social space for young people aged 12 + to congregate together, socialise and participate in informal recreation or physical activity.*

The fourth type, Youth space, has not been mentioned in CPL's Play Strategy. All of these typologies can be included together to meet the needs of all ages and abilities. Play space can be created to meet the needs of all children. It will be used differently for different age groups and at different times of the day.

See:

SPG Glossary

The age ranges in the document are indicative. They do not mean that users of different ages should be excluded from the play space. This recognises that children and young people have differing needs and that the space where they play or socialise will have different characteristics, space and location requirements. A playable space typology (table 4.6) addresses the potential for multifunctional spaces.

All dedicated play spaces should be genuinely playable and attractive to count as play provision. It is also essential that they are accessible (see chapter 3 on location and accessibility). Dedicated play space can therefore be formal and informal but informal provision should not replace formal provision entirely.

7. Social Infrastructure

In the proposals for Plot 15, there is no mention of children and young people's social infrastructure such as early years centres, youth clubs and community centres and routes between school and home. They play an important part in providing support for children and young people and their parents or carers. It would be a serious omission not to provide these facilities on-site.

CPL must provide children and young people's social infrastructure, for example youth clubs or community centres and early years centres.

D. The wisdom behind the policy

1. New Draft Plan

Play and childhood experts have been instrumental in formulating the Mayor's Play policy. They have been working on the new draft plan London Plan to clarify and tighten up the policy in order to help avoid abuse of the policies by developers. Many aspects are now included in the actual policy as opposed to clarification or special guidance under Policy S 4.

There is particular concern over the lack of respect for the minimum play space standard of 10 sq m and the way the child occupancy rate is calculated, as it leads to an under estimation of the amount of space to be allocated for children and young people.

The new draft plan seeks to balance Density with the Mayor's Good Growth policy.

Housing needs to include play and open space for the health of the people of all ages who will live in the development. Meeting the needs of children helps to maintain this balance.

Links

Draft London Plan with minor suggested changes Chapter 5 S4 Play and informal recreation
www.london.gov.uk/sites/default/files/draft_london_plan_showing_minor_suggested_changes_july_2018.pdf

London Plan 2011/2016 Policy 3.6 Children and young people's play and informal recreation
www.london.gov.uk/what-we-do/planning/london-plan/current-london-plan/london-plan-chapter-three-londons-people/polic-0

SPG 2012 Providing for Children and Young People's Play and Informal Recreation
www.london.gov.uk/what-we-do/planning/implementing-london-plan/planning-guidance-and-practice-notes/play-and-informal-recreation

2. Why it matters

There are many examples of good practice which 'ensure that all children and young people have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible'. (Policy 3.6 A) Play affects the way a child's brain develops, helps to develop motor skills, improves self confidence and ability to take risks.

Links

The Importance of Outdoor Play and Its Impact on Brain Development In Children
www.renaissance.edu.vn/wp-content/uploads/2018/01/The-Importance-of-Outdoor-Play-and-Its-Impact-on-Brain-Development-in-Children.pdf

London Study of Playgrounds – The Influence of Design on Play Behaviour in London vs New York, San Francisco, and Los Angeles
static1.squarespace.com/static/562e1f86e4b0b8640584b757/t/5a4cdf2f0d929722a0ed3085/1514987350174/LondonFullStudyReport.pdf

Design for play: a guide to creating successful play spaces Play England
playengland.org.uk/media/70684/design-for-play.pdf

Making Spaces for Play ZCD Architects
static1.squarespace.com/static/58aaf9b17bffc6029da965f/t/5a3018d241920204e4936232/1513101551019/L547_Making+Spaces+for+Play_FINAL_WEB.pdf

Children in urban regeneration: foundations for sustainable participation
allianceforchildhoodorguk.files.wordpress.com/2019/05/childrten-and-urban-regen.pdf

E. Summary

The following are the reasons that CPL's Play Strategy and proposals for Plot 15 are not good for children and ways to make it better.

1. Making Convoys Wharf Child Friendly

To make Convoys Wharf child friendly CPL must:

- a. Conform to the meaning and intention of the Mayor's Structural Plan policy 3.6 and S 4 of the new draft plan and LB Lewisham's policy on children and young people's play and recreation.
- b. Publish a strategy which shows where children of all ages from the development and the neighbourhood can play within the site and within sight of their homes.
- c. Show the necessity of consigning children to off-site provision if there is one.

d. Prove that children in the neighbourhood who use play spaces in the parks around Convoys Wharf are not put at a disadvantage if off-site provision is shown to be necessary.

e. Consult with park users, including children and young people, and managers of the parks.

2. Structural Segregation

Plot 15 is the second residential block for which CPL have put forward an RMA. The first is Plot 08. Looking at the two together it becomes clear that CPL's policy of putting play space in the residents private communal space is segregating children. This tendency to separate play space for children in privately owned housing from children in affordable and social rented housing has come to public attention recently and is being widely criticised. Children are social creatures and do not discriminate. According to the **Lewisham Leisure and open Space Study 5.23 Quality Standard**, *play spaces should be seen as part of the local community infrastructure.*

CPL must put play areas in the public realm to avoid structural segregation.

3. Proximity to home

The proposals for Plot 15 continue their policy of sending children over 5 'off-site'. All children and young people need space near their homes. They feel more secure and their parents are more inclined to allow them to go out unaccompanied. If they have to go elsewhere to play it can lead to a feeling of rejection and isolation. If parents have to accompany the younger children over 5 years to a play space it decreases the ability of children to feel confident and have some degree of independence. In many cases they will not be able to and the children will be trapped at home, unable to reach the off-site play spaces.

The position of Plot 15 next to the bus route and main road through the site has the potential to create a barrier to children's free movement.

See:

Lewisham Leisure and open Space Study 5.23 Quality Standard

- *All sites to be maintained to a good standard of 46% or above*
- *Reasonably close to home and within sight of main travel routes across site*
- *Located with informal surveillance from surrounding property or other well used facilities or public spaces*
- *Sited in places identified in agreement with local children and young people*
- *Be seen as part of the local community infrastructure*
- *Provide the opportunity for risk through design and choice of equipment and landscaping*
- *Provide opportunities for children of all abilities*

4 Design of inside space

Children's bedrooms are not large enough for children to have privacy to do their homework, invite friends or play in their room. The smallest room is hardly big enough for more than two beds and even with bunk beds the children will not have adequate space to do more than sleep.

5. Design of Play Spaces

a. It is important to involve children and their families in designing space to play from the beginning. They have ideas adults would never think of and the process helps to bring about social cohesion.

- b. The proposals for Plot 15 provide incidental play space more suitable for children over 5 years. The images in the Design Statement show this. Under 5's cannot normally do handstands.
- c. Children under 5 love to play with sand and water, to swing and slide. This could be included in the design.
- d. Consideration can be given to the needs of older children. They like to climb, take risks and kick a ball around for example. The upright posts which are intended to look like masts would benefit from some yardarms, ie horizontal posts on a mast, that the older children can also climb. Provide hard surfaces such as concrete and asphalt for games such as tag and football.
- e. The area designated for play is next to the car park. There will a problem of noxious fumes from the cars and their proximity to the play area if this present proposal goes ahead.

F. The bigger picture

Heritage: Deptford is known world wide for the work of Rachel and Margaret McMillan. Their philosophy was that children learned by exploring and would achieve their full potential through first-hand experience and active learning. They stressed the importance of free play, particularly with craft and water activities, and also outdoor play – providing large and varied external areas for this. It would be a mark of recognition of this important aspect of the heritage of Deptford to stand for the pioneering work of the McMillan sisters and adopt the same caring attitude to the children who are likely to live in Convoys Wharf.

Consequences: It is essential to provide the space that children need. Play has declined over the last 20 years or so. During that period the incidence of child obesity, depression, self harm, feelings of isolation and youth violence have increased. We are now at crisis point. The root of this crisis begins in early years and is compounded by the lack of play. Play helps children to form the basis of physical skills, emotional resilience and sociability. The right context for play supports them in their healthy development. The built environment can give them this context.

Responsibility: Developers have the potential to help to improve the wellbeing of children and young people; their ability to grow into healthy, productive and creative members of society begins with their ability to play. To deny them this opportunity through badly thought out strategies and design of play space and public realm, an overriding profit motive or even ignorance, is to contribute to the unhappiness and distress of this coming generation.

G. Conclusion

We rely on LB Lewisham to hold CPL to account and ask that you refuse permission for the RMA for Plot 15 until the matters raised regarding children and young people have been remedied.

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