

Parliament Hill Fields Adventure Playground, Hampstead Heath, NW5 1QR

Planning Statement

on behalf of City of London Corporation

15 August 2019



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1.0 Introduction

1.1 This planning statement is prepared by Nexus Planning Ltd on behalf of the City of London Corporation ("The Applicant") in support of a planning application submitted over the Parliament Hill Fields Adventure Playground, in Hampstead Heath ("The Site") to London Borough of Camden Council as the Local Planning Authority for the following development:

"Enhancement of the Parliament Hill Fields Adventure Playground, comprising of the installation of new play equipment, accessible paths, and landscape features."

1.2 The following documents have been submitted in support of this application:

- Application Form;
- CIL Form;
- Site Location Plan;
- Drawings prepared by DW Landscape Architects;
- Design and Access Statement prepared by DW Landscape Architects;
- Information Sheets for Play Equipment.

1.3 This planning statement should be read in conjunction with the above listed supporting documents.

1.4 This planning statement is structured as follows:

- Section 2 sets out a description of the application site and the surrounding area and provides an overview of relevant planning history;
- Section 3 details the development as proposed;
- Section 4 outlines the relevant planning policy context;
- Section 5 considers the development proposal against relevant planning policies;
- Section 6 provides an overall summary and conclusion.

2.0 Background Information

Site

- 2.1 The site is located in the southern part of Hampstead Heath, in close proximity to Gospel Oak Station. The application site is irregularly shaped, and has a total area of 4,500 sqm, and contains the Parliament Hill Fields Adventure Playground, Clubhouse and Peggy Jay Centre.



Figure 1: Location of Parliament Hill Fields Adventure Playground including Peggy Jay Centre

- 2.2 The existing Parliament Hill Fields Adventure Playground and Clubhouse provides safe but challenging play areas. The playground features a number of adventure play structures (including swings, rope climbers and a zip wire) and space for ball games.
- 2.3 The Applicant provides a programme of outdoor activities such as den building, obstacle courses, dodge ball, cricket, circus skills and water slides. Indoors, within the Clubhouse, there is space for

games, arts and crafts. The Applicant provides a programme of activities such as mask making, recycled junk modelling, leaf printing and badge making.

- 2.4 Directly adjacent to the Adventure Playground, but also within the application site is the Peggy Jay Centre (also known as the Ten O'clock Club and One O'clock Club) which provides space for indoor arts and crafts, education and play facilities, with an outdoor play area.
- 2.5 The site, being within Hampstead Heath, is designated Metropolitan Open Land (MOL). The site is also designated as Local Plan Open Space, and falls within the designated viewing corridor, which aims to preserve views to St Paul's Cathedral and the Palaces of Westminster.
- 2.6 The site is not located within a Conservation Area and does not contain a locally or statutory listed building.

Surrounding Area

- 2.7 The Adventure Playground is located between the Parliament Hill Fields Athletic Track to the north and Parliament Hill Lido to the east. To the south the playground is bordered by mature vegetation which screens the railway line. To the south of the railway line is an established residential neighbourhood. The site is located in close proximity to both Gospel Oak and Hampstead Heath train stations.

Planning History

- 2.8 A review of Camden's Planning Search Tool has not identified any historic applications over the Adventure Playground site. Notwithstanding, we acknowledge several applications have been submitted over the Heath, the most relevant of which we have tabulated below:

Table 1: Relevant Planning History - Application Site

Reference	Address	Proposal	Decision	Date
2018/6036/P	Athletics Track Pavilion Parliament Hill Fields Hampstead Heath London	Removal of non-original aluminium windows to changing rooms and replacement with white-finished double-glazed steel windows.	Granted	02/08/2019
2019/1125/P	Parliament Hill Fields Lido Highgate London NW5 1LT	Installation of full height metal gates & turnstile to main entrance, new full height turnstiles to changing rooms at	Granted	18/04/2019

		either end on the building with internal shutters at two new exit points, new stairs, rendered wall, handrails and associated signage.		
2017/5886/P and 2017/6976/L	Parliament Hill Lido Gordon House Road London NW5 1NA	Installation of roof-mounted solar panels onto the existing metal roof of Parliament Hill Lido Building	Granted	20/12/2017
2016/3308/P	Pavilion of the Athletics Track Parliament Hill Fields Hampstead Heath NW3 1TH	Removal of 2 x CCTV cameras. Erection of 1x 6m high tilt winch, and Re-Installation of CCTV Cameras.	Granted	03/08/2016
2012/2305/P	Parliament Hill Fields Refreshment Room Highgate Road London	Erection of fixed canopy to west side of the single-storey cafe building (Class A3).	Granted	19/06/2012
2008/4773/P	Tennis Courts Hampstead Heath Parliament Fields Highgate Road London NW5 1QR	The erection of an ice skating rink with associated cabin enclosures and decking above the tennis courts adjacent to Highgate Road for a temporary period from 17th November 2008 to 25th January 2009.	Granted	08/12/2008

3.0 Proposed Development

3.1 The proposed development seeks the improvement of the existing Parliament Hill Adventure Playground and the Peggy Jay Centre Playground through the installation of new play equipment and landscape features.

3.2 The purpose of the proposal is to enhance the play opportunities provided by the existing playground and improve the playground's accessibility.

3.3 Specifically, the proposal includes the following new features:

- Grassy mound
- Accessible path
- Giant rope swing and donut mound
- Large in-ground trampoline
- Oak bench
- Mini orchard
- Play panels on fencing
- Brass rubbing posts
- Playful planting
- Den building frames
- Stepping stone path
- Hollow log
- Climber for young children
- Swings with cradle seats
- Willow pod
- Embankment slide, ramp and rope
- Sand pit and sail shade
- Long grass

3.4 Existing play equipment within the Adventure Playground and Peggy Jay Centre grounds will be retained. The Design Layout Plan clearly shows and annotates the existing and proposed play equipment within the Application Site.

3.5 The details of the proposal are provided within the Design Statement prepared by Davies White. Furthermore, technical datasheets are provided for the items of play equipment proposed.

4.0 Planning Policy Context

4.1 The relevant planning policy framework includes:

- The National Planning Policy Framework (2019)
- The London Plan (2016)
- London Borough of Camden's Development Plan

4.2 The most relevant planning policy considerations from the NPPF, the London Plan, and Ealing's Development Plan have been identified and addressed below.

National Planning Policy Context

4.3 The National Planning Policy Framework was adopted 27th March 2012, and the Government published the updated National Planning Policy Framework ('NPPF') in July 2018, which was then revised in February 2019. The NPPF sets out the Government's planning policies and how these are expected to be applied.

4.4 At paragraph 7 the NPPF sets out that the purpose of the planning system is to achieve sustainable development. Paragraph 8 then identifies the three overarching objectives of sustainable development; the social, environmental and economic objectives.

4.5 At paragraph 11 the NPPF outlines a presumption in favour of sustainable development, and for decision-taking this means:

"Approving development proposals that accord with an up to date development plan without delay."

4.6 Chapter 8 of the NPPF emphasises the Government's intention to promote healthy and safe communities. Specifically, Paragraph 96 states:

"Access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities."

- 4.7 At Paragraph 215, the NPPF states that due weight should be given to relevant policies in existing development plans according to their degree of consistency with the NPPF.

Regional Planning Context

- 4.8 London Borough of Camden falls within the Greater London Area. Therefore, the London Plan (2016) is also of relevance, setting the planning strategy for the whole of London including Camden. This document sets out the Mayor's spatial development strategy for London. The London Plan outlines the integrated economic, environmental, transport and social planning policy.

- 4.9 The proposed scheme has been prepared in consideration with the following policies of the London Plan 2016:

- Policy 2.18 – Green Infrastructure
- Policy 3.16 – Protection and Enhancement of Social Infrastructure
- Policy 7.2 – An Inclusive Environment
- Policy 7.4 – Local Character
- Policy 7.5 – Public Realm
- Policy 7.11 – London View Management Framework
- Policy 7.17 – Metropolitan Open Land

- 4.10 Where relevant, these policies are discussed in further detail in Section 5.0 below.

Local Planning Policy Context

- 4.11 At the local level, Camden's Development Plan consists of the Camden Local Plan (2017), the Camden Site Allocations Local Development Document (2013), and various neighbourhood plans. The site falls within the Hampstead Neighbourhood Plan (2018).

- 4.12 The Local Plan (2017) provides the overarching vision, strategy and objectives for planning in Ealing to 2026. Key policies include:

- Policy C1 – Health and Wellbeing
- Policy C6 – Access for All
- Policy A1 – Managing the Impact of Development
- Policy A2 – Open Space
- Policy D1 – Design

4.13 The application site is not included in the Site Allocations Local Development Document (2013), and as such, this policy has not been taken into consideration in the preparation of this application.

4.14 The Hampstead Neighbourhood Plan (2018) provides a vision for the Neighbourhood Plan Area, and sets out five main aims and a number of policies to support the delivery of that vision. Key policies include:

- Policy DH1 – Design
- Policy NE1 – Local Green Spaces.

4.15 Camden Council has also adopted a number of “Camden Planning Guidance” (CPG) documents, and these have also been considered in the design of this proposal.

5.0 Material Planning Considerations

5.1 In this section of the Planning Statement, we assess the proposal against the most relevant policies from the planning framework, as identified above.

5.2 This assessment has specific regard to the following key issues:

- Principle of the Development
- Impact upon the Metropolitan Open Space
- Character and design
- View Management
- Inclusive Design
- Other Material Considerations

Principle of the Development

5.3 As noted above, Chapter 8 of the NPPF emphasises the Government's intention to support healthy and safe communities. Specifically, provision of social and recreational facilities is promoted at paragraph 92, and access to high quality open spaces and opportunities for sport and physical activity is encouraged at paragraph 96.

5.4 This position is supported by the London Plan, whereby Policy 3.16 states *"Development proposals which provide high quality social infrastructure will be supported in light of local and strategic social infrastructure needs assessments"*. It is noted that play and recreational facilities fall under the London Plan's definition of social infrastructure.

5.5 Under Policy A2 of the Camden Local Plan (2017), the provision of new play facilities is given priority, particularly when it meets residents' needs.

5.6 The proposal is considered to enhance the existing Adventure Playground, providing additional play equipment for public use. As such, the principle of the proposed development is considered to be

supported by relevant national, regional and local planning policy, being consistent with Chapter 8 of the NPPF, Policy 3.16 of the London Plan and Policy A2 of the Camden Local Plan.

Impact upon Metropolitan Open Land

- 5.7 It is acknowledged that the application site is within designated Metropolitan Open Land (MOL), as is all of Hampstead Heath.
- 5.8 Both Policies 7.17 of the London Plan and Policy A2 of the Camden Local Plan also emphasise the importance of preserving the openness and character of MOL.
- 5.9 Meanwhile, in line with Policy 7.17 of the London Plan, MOL is given the same level of protection as the Green Belt.
- 5.10 Paragraph 145 of the NPPF sets out that the construction of new development in the green belt (or MOL) is inappropriate, apart from in specific exception cases. One such exception, as stipulated at item (b) of Paragraph 145 is

“provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.”
- 5.11 As the proposed development represents enhancements to an existing outdoor recreation facility (the Parliament Hill Fields Adventure Playground), it is considered the proposal is an ‘exception’ in line with item (b) of Paragraph 145 of the NPPF, thus representing appropriate development within MOL. It is further emphasised that the extensions proposed to the Playground are small in scale, and would preserve the openness of Hampstead Heath.
- 5.12 Furthermore, as detailed within the Design Statement accompanying this application, the proposals have been carefully designed to reflect the landscape character of Hampstead Heath, so to preserve the openness and character of the MOL.
- 5.13 As such, it is considered the proposal is consistent with the NPPF, with Policy 7.17 of the London Plan and with Policy A2 of the Camden Local Plan.

Character and Design Considerations

- 5.14 As previously noted, Policy 7.17 of the London Plan and Policy A2 of the Camden Local Plan promote the preservation of the existing character of MOL.
- 5.15 Furthermore, Policy 7.4 of the London Plan emphasises that development proposals should contribute to a positive relationship with natural landscape features, including the underlying landform and topography of an area, and make a positive contribution to the character of a place.
- 5.16 Policy 7.5 of the London Plan requires social infrastructure (including landscape treatments and furniture) to be of the *“highest quality, have a clear purpose, maintain uncluttered spaces and should contribute to the easy movement of people through the space”*.
- 5.17 Policy D1 of the Camden Local Plan also emphasises that development must respect its local context and character, and comprise high quality, complementary materials, detailing and landscaping design.
- 5.18 This policy position is reiterated by Policy DH1 of the Hampstead Neighbourhood Plan, which requires development proposals to demonstrate how they respect and enhance the local character context.
- 5.19 The proposed enhancements to the Parliament Hill Fields Adventure Playground have been carefully designed to reflect the existing character of the playground, as well as the landscape character of the wider Hampstead Heath area.
- 5.20 Specifically, the enhancements to the playground include natural features such as grassy mounds and stepping stones, which will complement the landscape character of the surrounding area.
- 5.21 Additionally, new play equipment will utilise high quality materials, but will take design cues from the natural environment. For example, the proposed rope swing will utilise timber with natural colourings, to reflect the landscape character of the surrounding open space and parkland.
- 5.22 Further detail of the design rationale is provided in DW Landscape Architect’s Design Statement.
- 5.23 Overall it is considered the proposal is complementary to the landscape character of the surrounding Hampstead Heath.

- 5.24 For these reasons, the proposal is considered to comply with Policies 7.4, 7.5 and 7.17 of the London Plan, Policies A2 and D1 of the Camden Local Plan, and Policy DH1 of the Hampstead Neighbourhood Plan.

View Management

- 5.25 As noted above, the application site falls within designated View Management Corridors, which aim to preserve views from Parliament Hill to Central London (and specifically, to St Pauls Cathedral and the Palace of Westminster).
- 5.26 Policies 7.11 and 7.12 of the London Plan seek to protect these existing view corridors, by ensuring development in the foreground is not overly intrusive, unsightly or prominent to the detriment of the view.
- 5.27 The highest component of the proposed development would be the rope swing, which has a height of 5.70m. However, the rope swing is designed from a lowered ground level (approximately 2.15m below natural ground), to maximise the playing experience. As such, the overall height of the swing is reduced to 3.55m.
- 5.28 Furthermore, it is noted that the proposed rope swing comprises of timber beams, and as such will not be bulky in appearance. Therefore, it is not considered this element of the proposal would be intrusive to existing views.
- 5.29 All other elements of the proposed playground enhancements are low-rise in nature, and would not impact on existing views.
- 5.30 Given the low overall height and non-bulky nature of the proposed play equipment, it is not considered that the proposal would be intrusive, unsightly or prominent, or detrimental to existing views.
- 5.31 As such, the proposal is considered to be consistent with Policies 7.11 and 7.12 of the London Plan in this regard.

Inclusive Design

- 5.32 Policy 7.2 of the London Plan, and Policy C6 of the Camden Local Plan encourage developments to demonstrate the highest standards of accessible and inclusive design.
- 5.33 A key element of the proposed enhancements to the Playground is improving the accessibility of the existing play facilities
- 5.34 In particular, the proposal includes a large in-ground trampoline specifically designed to be accessible by wheel-chair users, as well as a new accessible path.
- 5.35 Further details of inclusive design are provided within the Design Statement prepared by DW Landscape Architects.
- 5.36 Overall, the proposal will enhance the accessibility of the Parliament Hill Fields Adventure Playground and Peggy Jay Centre Playground such that the development is consistent with the outcomes sought by Policy 7.2 of the London Plan, and Policy C6 of the Camden Local Plan.

Other Material Planning Considerations

- 5.37 With respect to **flood risk**, it is noted that the application site is located in Flood Zone 1, and does not exceed one hectare in size. As such, a flood risk assessment is not considered to be necessary.

6.0 Conclusions

- 6.1 The proposed development at Parliament Hill Adventure Playground including the Peggy Jay Centre, Hampstead Heath involves the installation of new play equipment and landscape features within the existing playground.
- 6.2 The proposal which comprises of the provision of appropriate facilities for outdoor recreation within an existing Playground, is considered to represent acceptable development within Metropolitan Open Land in line with Paragraph 145 (b) of the NPPF.
- 6.3 The design of the proposal has been carefully developed to ensure the openness and landscape character of Hampstead Heath is preserved and enhanced.
- 6.4 The proposal improves upon existing levels of accessibility and inclusive design within the Playground ensuring the play facilities can be enjoyed by all.
- 6.5 The development will not impact on existing views from Parliament Hill to Central London, and is considered acceptable in this regard.
- 6.6 Overall, the proposal is considered to be consistent with relevant national, regional and local planning policy considerations, and as such should be granted approval without delay

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