

Consultation Response Form

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<u>Organisation (if applicable)</u>	Play Wales

Comments

- Are there any further comments that you would like to make on the NDF, or any alternative proposals you feel we should consider?

Play Wales is the national organisation for children's play and wish to make comment about how planning influences children's opportunities to play. We are pleased to see that spatial planning is being considered through the National Development Framework. This is a welcome development.

National play policy

A section on Play Opportunities was included in the Children and Families (Wales) Measure 2010. The Measure places a duty on local authorities to assess and secure sufficient play opportunities for children.

The Measure, with this particular duty, represents a unique opportunity to consider how we as a society recognise and meet children's play needs, and better provide for them. As well as submitting detailed play sufficiency assessments to the Welsh Government every three years, local authorities must also produce and report on annual action plans.

Wales – a Play Friendly Country (Welsh Government, 2014) is statutory guidance to local authorities on assessing for and securing sufficient play opportunities for children in their areas. It notes that Town and Country

Planning is an important factor in providing spaces where children can play. The Welsh Government expects play sufficiency assessments to assess the extent to which:

- Planning of the built environment, including housing and use of public and open spaces, provides for children's opportunities to play.
- The Local Development Plan recognises and addresses the outdoor play needs of children of various ages.

Other than Wales, the Scottish Government is the only other government globally to consider placing play in statute. Very recently, it has committed to integrating play sufficiency assessments into planning reforms.

The right to play

Internationally, the importance of play is recognised and protected in the United Nations Convention on the Rights of the Child (UNCRC). Article 31 of the UNCRC states that the child has the right to play and to join in other recreational activities.

As an indication of the significance the United Nations places on children's play it has published a General Comment on Article 31. This is an official statement that elaborates on the meaning of an aspect of the UNCRC that requires further interpretation or emphasis. The aim of the General Comment is to clarify the meaning and importance of Article 31.

The General Comment notes the role that local authority planning has in supporting children to access their right to play. Local authorities should assess provision of play and recreation facilities to guarantee equality of access by all groups of children, including through child-impact assessments.

It stresses that public planning must place a priority on the creation of environments which promote the well-being of the child. 'To achieve the necessary child-friendly urban and rural environments, consideration should be given to the:

- Availability of inclusive parks and playgrounds that are safe and accessible to all children;
- Creation of a safe living environment for free play, including design of zones in which players, pedestrians and bikers have priority;
- Provision of access to landscaped green areas, large open spaces and nature for play and recreation;
- Road traffic measures, including speed limits, levels of pollution, school crossings, traffic lights, and calming measures to ensure the rights of children to play safely within their local communities.' (Committee on the Rights of the Child, 2013)

Given the duties placed on Welsh Ministers through the Rights of Children and Young Persons (Wales) Measure 2011, it is pertinent for Welsh Government to be mindful of guidance from the UN Committee.

Planning for play

Quality residential design promotes a healthy lifestyle and should consider access to amenities and public spaces. A sense of place is important to help children and teenagers to feel part of their community and neighbourhood. The design of streets, squares and open spaces should be accessible and create a feeling of safety for all who use it.

Recent research for National House Building Council (NHBC) Foundation (see <https://www.zcdarchitects.co.uk/research-essays>) found that the design of neighbourhoods can influence the way space is used for play and wider social use. Mapping exercises carried out on seven housing developments explored whether homes had safe, direct access to external space, the availability of car-free networks to promote safe walking or cycling, and whether street layout encourages social interaction. It concluded that higher levels of outdoor play can be achieved through good neighbourhood design.

A richness of space needs to be expected in new housing design, supported by an attitude that promotes play in the built environment. Local authority planning policy needs to more actively advocate that outdoor play occurs beyond parks and playgrounds.

Researching play sufficiency in Wales

Since the commencement of the Welsh Play Sufficiency Duty in 2012, a process for which there was no precedent, a series of research studies have been commissioned by Play Wales exploring the work involved and what has changed during that time.

The researchers adapted Ash Amin's four registers of a 'good city' (perhaps most easily understood as ways of working), which it is suggested can be combined to nurture a play friendly country and create environments that are more 'open to children's play presence'.

The research findings suggest that play sufficiency is a matter of spatial justice, requiring adults to critically scrutinize our habits, assumptions and routines to consider how they/we might include or exclude children and their play from the public realm. The summary report for the most recent research (2019) can be found:

<https://www.playwales.org.uk/login/uploaded/documents/Play%20sufficiency/Summary%20report>

[%20-%20sufficiency%20research%202019%20.pdf](#)

Looking ahead

Play Wales recommends the review of Technical Advice Note (TAN) 16: sport, recreation and open space. This TAN was published a decade ago, several years prior to the commencement of Play Sufficiency Duties.

It is timely to review it to ensure further the integration of the links between health and well-being, play and and sustainable development in Wales. A review of TAN 16 has the potential to provide up to date planning guidance in accordance with policies set out in the most recent edition of Planning Policy Wales and other key government policies and strategies. This will support local and strategic development plans to take account of children's play, in line with other Welsh Government policies, strategies and legislation.

Are you...?

Providing your own personal response	<input type="checkbox"/>
Submitting a response on behalf of an organisation	<input checked="" type="checkbox"/>

Responses to the consultation will be shared with the National Assembly for Wales and are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here

