

M54 Play Spaces

Would Policy S4 address strategic matters of London wide importance relating to play and informal recreation? In particular:

a) Would Policy S4 provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans in relation to play and informal space?

b) In light of the need for increased densities and differing local contexts, would requirements as set out at Policy S4B2 be justified, particularly a space standard per child for accessible on site play provision? Overall would it provide sufficient flexibility to reflect local circumstances?

In the context of increasing densities and the stringent constraints placed on developments by the lack of a financial plan for the London Plan, and in view especially of proposed DF1 which places social infrastructure such as play space as a very low priority for use of S106/CIL contributions, it is important to specify more clearly in S4 B the policy expectations and standards for play space provision in relation to:

- (a) any off-site provision should fully conform to standards set
- (b) all play space should be publicly overlooked and fully integrated into neighbourhoods
- (c) There are significant equalities issues (for children and carers) related to play space provision in private and inaccessible situations eg rooftop provision.

We propose specific amendments to the text below.

We note the importance the Mayor places on the role of planning in promoting healthy lifestyles in the context of his “good growth” agenda, and in the following amendment in MSC:

“Delivering Good Growth will involve prioritising health in all London’s planning decisions, including through design that supports health outcomes, and the assessment and mitigation of any potential adverse impacts of development proposals on health and health inequality.”

We also note the ill-health consequences of lack of play space, and potential inequalities issues associated with inadequate play space, inaccessible play spaces (not onsite), and play space which is not public space, impacting differentially on London’s residents. London’s Health Inequalities strategy makes a strong commitment to improving children’s health through having healthier play spaces.

The IIA noted in relation to the Social Infrastructure chapter that,

There is an underlying support for health improvements across this chapter, particularly in children and young people. The provision of, and access to, play space and recreational facilities would help increase exercise levels, encouraging healthier and active lifestyles from an early age.”

The IIA (p. 179) made observations relevant to our concerns on the policies on play space:

“It was recommended that further information be provided on inclusive access for different community groups in an effort to encourage social integration and reduce anti-social behaviour.”

The GLA made no comments on this issue in their response.

Finally, we note the two key objectives for the DNLP distilled for assessment in the IIA:

- “1. To make London a fair and inclusive city where every person is able to participate, reducing inequality and disadvantage and addressing the diverse needs to the population
2. To ensure London has socially integrated communities which are strong, resilient and free of prejudice.”

We feel that the provision of play space in developments off-site or in private spaces or on rooftops, for example, is significantly undermining the achievement of these goals.

We are concerned that the Draft New London Plan undercuts the expectation in the FALP text 3.41 which expected that:

*Off-site provision, including the creation of new facilities, improvements to existing provision and an appropriate financial contribution secured by legal agreement 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.*

We request an amendment to text 5.46 to re-insert “fully” immediately before “satisfies the need of the development”. A statement should be added to insist that any off-site provision must only be permitted when it fully satisfy the standards for proximity of play grounds for different age groups. Off-site provision should not lead to any lack of conformity to these standards.

If these standards of distance to play areas are not maintained in the case of contributions in lieu of onsite provision, what standards are applicable? How will appropriate play space provision be secured in these cases?

We note the stated ambitions in Policy S4 B 2 (c) that play spaces should be integrated into the surrounding neighbourhood, and text 5.4.3, which elaborates on that (“It should integrate into the wider network of public open spaces and not be severed from the rest of a neighbourhood by physical barriers such as main roads”) and indicates that to achieve this, play spaces should be “overlooked in some way to allow

for a level of informal community supervision and generate a sense of safety and security.”

However, we observe from numerous planning applications, especially where infrastructure demands are excessive, or the developer model is more financially constrained (Build to rent) that play spaces are being routinely provided on the rooftops of tall buildings, and in private amenity contexts. As the wording of 5.4.3 makes clear, such spaces are less secure for children’s play as there is no informal community oversight. They also create physical barriers to the neighbourhood (counter to the expectations of this text) and generate barriers to social interaction and constitutions of feelings of belonging and mutual recognition amongst different groups (as per the IIA summary objectives 1 and 2). This also creates inequalities in provision, significant access issues for disabled children or carers, and in terms of health impacts, if play provision is provided exclusively.

The private provision of play space in inaccessible areas also means that these developments are not making the appropriate contribution to making the developments acceptable in planning terms in relation to the wider provision of social infrastructure in the neighbourhoods.

Playspace provision on roofs and in semi-private amenity space is not meeting the expectations in text statements for this policy - we can provide several examples of this in OPDC applications which are being approved by the Mayor himself counter to his stated policy regarding the quality of play space required

This policy therefore needs to be strengthened and further elaboration provided in the policy box itself so there is no ambiguity. So we ask that this text statement be put in the policy box to definitively state the expected play space requirements:

MOVE TO POLICY BOX:

5.4.3 Where **formal play provision** is provided in new developments, it should be free, well-designed, accessible, inclusive and stimulating. It should integrate into the wider network of public open spaces and not be severed from the rest of a neighbourhood by physical barriers such as main roads. Play provision should be overlooked in some way to allow for a level of informal community supervision and generate a sense of safety and security. Integrating natural environments into play provision is encouraged, acknowledging the benefits to learning, and to help to support a green infrastructure network across the city.

We request an additional statement in the text to the effect that playspace provision on roofs and in semi-private amenity space does not conform with the policy expectations of the DNLP.

There should be no reason why larger developments cannot provide publicly accessible on-site play space according to standards. **We recommend that Text 5.4.6 be deleted** or significantly amended to reflect

- (a) that standards established in the Mayor policy for play spaces for different age groups apply completely for off-site provision in terms of size and proximity of play spaces to the development.
- (b) We recommend that therefore off-site provision for young children will not usually be allowed and is likely to be feasible only in the case of small developments. Perhaps financial contributions for play space provision on

individual developments should be limited to small sites developments and be clearly demonstrated through viability assessments, subject to public consultation. Any “off-site provision” should be within the policy compliant distant from the population to inhabit the development in question.