

London Plan Examination in Public – Written Statement

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Play and Informal Recreation

M54. 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?

The Assembly's Planning Committee considers play and informal recreation facilities contribute to Good Growth if that means growth that is socially and economically inclusive and environmentally sustainable.

The Assembly strongly supports Policy S4. The emphasis placed on an integrated approach to play provision across a neighbourhood, the importance of safe, direct access, and the value of accessible routes strengthen and build on the guidance in the current SPG.

Provision of play and informal recreation facilities are essential to meet the needs for children and young people, and these are vital to meeting the Mayor's Good Growth objectives that will deliver the objectives of building safe and healthy communities.

Policy S4 could helpfully be revised to include reference to 'playable space' where children's active play is a legitimate use of the space. The policy should also highlight the value of the direct involvement of children and young people themselves in securing and improving opportunities for play in their neighbourhoods.

Policy S4 should rule out the possibility of un-overlooked roof space being proposed for play, and should include a presumption against gated spaces, because of the importance of good surveillance and circulation. There should also be cross-reference between Policy S4 and housing

design policies and guidance as discussed in the context of Housing Quality and Standards Matter 36.

- 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?**

The Assembly's Planning Committee has concerns about managing higher residential densities that can support the required play space standards. The Mayor faces a challenge to deliver, through planning policy, the required level of amenity and access to play facilities that will be required to make higher residential densities sustainable.

Adequate provision for play and informal recreation will be increasingly more important with the advent of higher residential densities needed to accommodate the Mayor's higher residential targets.

The Assembly welcomes the fact that the new plan builds on and strengthens what is in the current plan. In particular we welcome that the benchmark standard of 10 square meters per child and young person is embedded in the policy.

The existing London Plan recognises that in a densely urbanised city like London, safe and stimulating play and recreation space for under-18s are essential for a child's welfare and future development. It recognises that new mixed use and housing development should make provision for play space. New provision is based on the accessibility of existing facilities (eg: an adjacent park) and a minimum benchmark of 10 square metres of dedicated age appropriate play space provision per child (eg: under 5's, ball game areas for older children) that would be generated by new development.

Existing national standards are around four times higher than that achieved in London and boroughs have, as a consequence, been using a "more realistic and achievable figure as a benchmark standard for London." However, since it was introduced, implementation of this policy has not been as consistent and it is crucial that the standards are embedded in policy in the plan.

The Planning Committee has heard that “unlike newts or bats we have no protection for children’s play environment under the planning system.”ⁱ

The Plan needs to recognise that non-designated, or informal play space, needs to be protected and included in the requirement for a borough audit of play space.

This is likely to become more important as the presumption in favour of developing small sites could mean that children lose very valuable scraps of land for play and when boroughs do their needs assessment, this should be addressed in policy (see the Assembly’s response to the Draft London Plan on Policy H2).

It is therefore important that the policy sets a minimum spatial component for playable space, otherwise the pressure to densify could leave developments with inadequate space. Moreover, if sufficient space is not secured at the outset then it will be almost impossible to do so at a later date.

The current SPG benchmark of 10 sqm/child should be included in the Policy as it is well understood.

The Assembly’s Planning Committee recommends that, to ensure play space standards are maintained, protected and, where possible enhanced:

- Policy S4 B3 should make reference not just to accessible routes to play provision, but strongly recommend that this play provision has:
- Direct access to car-free shared space, preferably from the front door and that it is overlooked
- Play space with clear sightlines which avoids single aspect housing
- Doorstep play outside every door, whether a corridor or ground floor level

Policy S4, and the supporting text, needs to recognise the important role that non-designated play space (as opposed to formal space) plays in a city that is projected to grow denser.

ⁱ Tim Gill, London Assembly Planning Committee, 28 June 2017