

1. Justification for this policy

Policy S4 is unequivocally justified, under international, national and regional obligations:

1) Under article 31 of the UN Convention of the Rights of the Child (1989), which protects children's right to play and to enjoy their own social and cultural lives. The UN places an obligation on local as well as regional and national governments to 'legislate, plan and budget' in order to 'recognise, protect and fulfil' this right (UNCRC, 2013)

2) Under the National Planning Policy Framework (NPPF) Policies 92, 96 and 97; in which children and young people's need for a degree of freedom, appropriate to their age, to access public space for their play and recreation; their own social and cultural lives, is greatly implied within the stipulation that planning policies and decisions 'should aim to achieve healthy, inclusive and safe places which promote social interaction, ... street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods ... (that) ... are safe and accessible ...'. It is increasingly recognised in urban planning discourse that "If we can build a successful city for children, we will have a successful city for all people"¹.

3) Under the London Plan's own overarching objectives, particularly those set out in Policy GG1; which aims to 'ensure that streets and public spaces are consistently planned for people to move around and spend time in comfort and safety, creating places where everyone is welcome, which foster a sense of belonging, which encourage and community buy-in and ownership, and where communities can develop, flourish and thrive'.

Benefits of play

It is also justified by scientific evidence of the nature and importance of children's play. An extensive, trans-disciplinary, literature review (Lester and Russell, 2008) found that it has a vital role in:

- **Emotion regulation:** play enhances the development of flexible and adaptive emotions.
- **Pleasure and enjoyment and the promotion of positive feelings:** play, as an enjoyable experience, promotes positive affect, which in turn encourages further exploration, novelty and creativity.
- **Stress response systems:** play offers the opportunity to create and resolve uncertainty
- **Creativity:** the key relationship between play and creativity exists in the flexibility of responses to novel and uncertain situations and the non-serious interpretation of a range of stimuli.
- **Learning:** the primary benefits of play are found within the integration of motivation, emotion and reward systems rather than the higher cognitive aspects of brain development

¹ Enrique Peñalosa, Mayor of Bogotá, Columbia (1998- 2001, 2016-present), specialist on urban planning and transport policy

- **Attachment:** play has a central role, from the first moments of life through to adulthood, in developing strong attachments.
- **Place attachment:** just as children need strong social attachments, attachment to place may also be seen as a key adaptive system. The creation of a sense of place is vital not only to a sense of wellbeing but also to maintaining the quality and vitality of the environment.

There is also evidence (e.g. Mackett and Paskins, 2008) of a significant correlation between children's freedom to play and their physical activity levels.

Barriers to neighbourhood play

To derive these benefits as fully as they need, children require space, permission and opportunity – with degrees of independence according to their age. Growing evidence (e.g. Shaw et al, 2015) indicates that for large numbers of children, especially in urban areas, these conditions are not present; that the outdoor world largely excludes them. Traffic, pollution, perceived 'stranger-danger', fears of bullying and youth-on-youth crime, and the disappearance of many neighbourhood communities as families become increasingly atomised, are all barriers to the enjoyment of the healthy outdoor play that previous generations could take for granted as an integral part of childhood. Today, children's freedom to play outside unsupervised is increasingly reserved until they are in secondary school, by which time lifestyle behaviours are largely established.

It is vital that planning policy tackle this issue, not just for the 20+ per cent of Londoners under the age of 16, but for that generation's health and wellbeing as future adults – and for the generations to come.

2. Effectiveness of this policy as a strategic framework

It is recognised good practice in strategic planning for children and young people's play and recreational opportunities that a number of different domains and their respective policies must correlate. Housing, traffic management, street design and pedestrian schemes are as important as dedicated play areas; more so for the many children not living within easy distance of such, or close to accessible green space. The need for collaborative, strategic planning, with aims and principles shared across departments is well established and was the approach of the first London Plan, which included *Guidance to the London Boroughs on Preparing Local Play Strategies* (Mayor of London, 2004), an approach later adopted by the UK government (DCSF/DCMS, 2008).²

Policy S4 retains this strategic, cross-cutting approach and this is welcome. Indeed, it improves on it to the extent that it now recognises children's need 'to play and move around their local neighbourhood safely and independently', in addition to having access to sufficient and suitable play provision. This is an important change. Dedicated play provision is of limited use if the wider public domain is either inaccessible to children, or deemed to be so by their parents. The importance of safe and accessible routes for children within their local neighbourhoods is vital (and should also be noted within the design policy D4). The SPG on children and young people's play and recreation should be revised to reflect this new emphasis.

Neighbourhood plans should be the context for planning decisions under this policy. It is essential that a thorough mapping of existing provision, opportunities and play behaviours is undertaken (not merely an audit of existing play equipment) at a neighbourhood level and that development plans'

² *Policy for play – responding to children's forgotten right*, by Adrian Voce (Policy Press, 2015) relates the development of play policy in England during the 2000s, including the innovation of the first London Plan and its influence on national government. A copy has been submitted to the EIP library.

treatment of children's play is made and reviewed in this light. Local play strategies should be based on such neighbourhood mapping of play opportunities.

It should be acknowledged that since 2010, the absence of a specific national play policy for England has meant very few local authorities now have current local area play strategies. In 2014 a FOI request by the Children's Rights Alliance for England found only 7 London Boroughs had current play strategies, compared with 33 in 2009 (when there was a national Play Strategy underpinned by significant treasury funding). It is therefore recommended that a revision of the SPG should be accompanied by a revision of the key elements of the original guide to preparing play strategies, in the light of subsequent experience, and published either as an appendix to the SPG or as discrete guidance. One very significant effect of this guidance was the widespread establishment of cross-cutting groups within the London Boroughs to co-ordinate the development of the strategies, elevating the status of children's play as a consideration in local development plans and the scrutiny of individual developments.

Is Policy S4B2 [i.e. 10 sqm per child] justified?

There is emerging evidence, albeit anecdotal, that (perhaps because of the lack of scrutiny indicated in the previous paragraph) some developments are failing to deliver space for play and informal recreation as set out in the SPG, even with the 10sqm standard present.

The spatial standard should be retained, while stressing that this is a minimum 'rule-of-thumb'; allocations of space for children's play and recreation should always be commensurate to actual demographic needs and with due regard to the wider built environment and its affordances, as determined by thorough mapping, auditing and consultation (including, wherever possible, the participation of children and young people).

Overall recommendation

S4 is a progressive policy for children's play and recreation and is welcomed. However, in the absence of either specific statutory duties or financial incentives for local authorities in this policy area, S4 must be as strongly worded, and provide as much guidance, as possible if it is to be truly effective. It should include the most imperative language appropriate to the Plan's authority in its direction to the London boroughs to undertake play audits, prepare local play strategies, and have regard to the SPG in all relevant planning decisions. The SPG should include, or be accompanied by, guidance on the preparation of local play strategies.

Adrian Voce
28 February 2019

References

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