

A submission from London Play to the Levelling Up, Housing and Communities Committee Inquiry on Children, Young People and the Built Environment

January 2024

London Play is a small but influential charity that exists to ensure that all children in London have the space, time and freedom to play outside every day, near to where they live.¹ We are making this submission because we believe that a hostile built environment currently significantly restricts children's ability to play outside freely and move independently around their neighbourhood. Below we address each of the four terms of reference posed in the inquiry and offer some recommendations in conclusion.

1 The experiences of children and young people of their built environment

A child's right to play is enshrined in Article 31 of the UN Convention on the Rights of the Child; but this is not incorporated into domestic law in England. This results in decisions being made that limit children's ability to enjoy that right – including those relating to the built environment.

Play is crucial for children's mental and physical health, their happiness and development. Despite this, children's outdoor play and independence have declined dramatically over the last few generations. A survey carried out for Playday 2022 found that only 27 per cent of children play regularly outside their homes, compared with 71 per cent of the baby boomer generation.² Sustrans research in 2016 showed children spend almost half the amount of time playing outside than their parents did.³

Studies also consistently find that a clear majority of children today want to play outside more often near their homes. Playday 2006 research found that 72 per cent of children wanted to play out more often than currently,⁴ in 2020 a Girlguiding UK study put this figure at 70 per cent.⁵ A Play England survey recently asked children what would encourage them to play out more often. Among the most common responses were more spaces and areas to play and streets designed to be play friendly.⁶

There are three broad areas of concern:

¹ www.londonplay.org.uk

² <https://www.savethechildren.org.uk/news/media-centre/press-releases/children-today-62-percent-less-likely-to-play-outside-than-their>

³ <https://www.sustrans.org.uk/our-blog/news/2016/june/research-shows-kids-play-outside-half-as-much-as-parents-did>

⁴ <https://www.playday.org.uk/campaigns-3/previous-campaigns/2006-play-naturally/>

⁵ <https://www.girlguiding.org.uk/globalassets/docs-and-resources/research-and-campaigns/research-briefing---adventure-and-play.pdf>

⁶ <https://static1.squarespace.com/static/609a5802ba3f13305c43d352/t/64ca676f4c818d6700d320ae/1690986358314/Street+Play+Report+July+2023+Final2.pdf>

Dangerous roads and cars, parked and moving

Traffic is the number one reason that children don't play out as often as they used to.⁷ Children are prevented both from playing in the streets where they live; and also from independently accessing play areas, friends' houses, parks and other local places that require them to navigate busy roads. The 'home range' of children has shrunk dramatically over the past three generations⁸; and according to the 2020 British Children's Play Survey the average age at which children are allowed to play out independently today is 11 years old – two years later than for their parents.⁹

Meanwhile in London 80 per cent of public space is made up of streets; while on street parking provision is equivalent in area to the entire London borough of Southwark.¹⁰ The exclusion of children from our urban streets to accommodate private cars constitutes a serious miscarriage of social and spatial justice.

Quantity and accessibility of public play provision

To be able to exercise their right and need to play daily, every child's home should be within a few minutes' independent walk of a suitable play space. Many live much further away; while others need chaperoning by an adult over even short distances to ensure they get there safely across dangerous roads.

Research from the Association of Play Industries (API) in 2022 revealed that children across the UK are subject to a 'postcode lottery' when it comes to provision of public playgrounds. Children in London have access to almost five times fewer public playgrounds than children in Scotland, with only one playground for every 866 children.¹¹ A Natural England study found that 1 in 7 children in London do not access even their local green space in an average year; children from black and minority ethnic backgrounds do so even less frequently.¹²

Children in households with no garden rely heavily on public play areas for outdoor play and exercise – ONS statistics highlight that this applies to 21 per cent of households in London, the highest proportion of any English region. So, the need for access to public play space in London is particularly acute. Again, there are stark inequalities at play: black households being four times less likely to have access to outdoor space at home than white households.¹³

⁷ <https://westminsterresearch.westminster.ac.uk/item/98xyq/children-s-independent-mobility-an-international-comparison-and-recommendations-for-action>

⁸ <https://doi.org/10.1080/14733285.2014.952186>

⁹ <https://www.mdpi.com/1660-4601/18/8/4334>

¹⁰ https://issuu.com/zipcaruk/docs/carlite_final_jan27_online_view/2

¹¹ <https://www.api-play.org/news-events/equal-play-campaign/>

¹² <https://www.gov.uk/government/statistics/monitor-of-engagement-with-the-natural-environment-pilot-study-visits-to-the-natural-environment-by-children>

¹³ <https://www.ons.gov.uk/economy/environmentalaccounts/articles/oneineightbritishhouseholdshasnogarden/2020-05-14>

Quality of public play provision

Too many existing play spaces offer poor quality play experiences or are subject to chronic neglect. London Play's recent 'London's Saddest Playground' campaign elicited a raft of submissions depicting playgrounds blighted by litter and graffiti, broken and poorly maintained equipment, and fire damage – but also playgrounds in brand new housing developments that appeared to be little more than a box-ticking exercise.¹⁴

London Play's 2023 survey of councils (who provide and maintain most public play spaces in the capital) found that in two thirds of them, revenue funding (to maintain or staff playgrounds) was expected to remain static or fall in the coming three years.¹⁵

Quality play provision means offering children a range of play types, experiences and ways of playing, as well as catering to different age groups, genders and abilities. Again, this is often lacking in one or more dimensions:

Age: There is generally a lack of provision for teens in parks. A recent Parks for London report highlighted that at a certain age, young people are suddenly no longer allowed to access some equipment such as swings¹⁶ despite wanting to continue to do so. Additionally, levels of connection with nature dip as children approach their early teenage years.¹⁷ London Play's work with community groups campaigning for better play in their areas highlights that some parks may prioritise toddlers or older children – but often not both. Adventure playgrounds, which cater for younger teens are closing at an alarming rate. The capital has lost 12 adventure playgrounds in the last decade – six since the pandemic – leaving just 72 remaining.

Gender: Research from the campaign group Make Space for Girls and others shows that girls (and particularly teen girls) tend to feel less welcome, less safe and less catered for in many outdoor parks and spaces than boys. Once they are of an age to access parks independently, parks are used much more by boys than girls, and girls use them with less confidence.¹⁸

Disability: The charity Scope says that almost half of families with disabled children face accessibility problems with their local playground.¹⁹

There is also evidence of increasing societal intolerance towards normal behaviour by children, which is often more tangentially related to the built environment. For example, the plethora of 'no ball game' signs on housing estates, and reports of angry residents complaining about noise from adjacent playgrounds or children playing in the streets.²⁰

¹⁴ https://londonplay.org.uk/our_news/south-london-playgrounds-are-saddest-in-the-capital/

¹⁵ https://londonplay.org.uk/our_news/ghostly-future-looms-for-london-playgrounds/

¹⁶ <https://parksforlondon.org.uk/wp-content/uploads/2022/10/young-green-and-well-report-2022.pdf>

¹⁷ <https://publications.naturalengland.org.uk/publication/6005041314136064>

¹⁸ <https://www.makespaceforgirls.co.uk/resources/research-report-2023>

¹⁹ <https://www.scope.org.uk/campaigns/lets-play-fair/>

²⁰ <https://www.theguardian.com/environment/2023/apr/15/cars-dog-poo-and-delivery-drivers-why-children-dont-play-out-anymore>

2 Children and the planning system

Children's rights and needs are not met at all in national planning policy or guidance, and their opinions are rarely – if ever – sought. The National Planning Policy Framework does not include any requirements relating to children, and there is no national guidance on child-friendly planning.

In London, the London Plan includes Policy 3.6 on 'Children and Young People's Play and Informal Recreation Facilities' and the associated Supplementary Planning Guidance supports its implementation.²¹ This states that "The Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well designed, secure and stimulating play and informal recreation provision." It also states that local authorities should audit play provision to identify gaps; and produce play strategies. New developments should provide 10sqm of play space per resident child.

In theory, boroughs' local development documents must be 'in general conformity' with the London Plan. The reality is that this guidance is poorly adhered to and not strictly enforced. Many of the play areas provided by developers are tokenistic in the extreme; while segregation of play space by tenure persists.²²

In Wales and more recently in Scotland, councils are subject to a legal play sufficiency duty which requires them to audit play provision, identify gaps and develop plan to address these. Until the same duty is imposed on English councils there is little incentive for them to monitor or ensure the quantity, quality or accessibility of play opportunities in their areas. Most local authorities in London do not have a current play strategy (although London Play has recently produced one for Lewisham Council and hopes others will follow suit).

In London and anywhere that land values are high, existing play space is under continual threat of development. Additionally, stories of incursions by developers are common. Recently London Play brought to light the example of Hatcham Gardens in Lewisham²³, where developers had 'temporarily' taken over a playground in a high-density deprived area, while developing an adjacent site. Five years later, they had failed to return it to the community as promised.

3 Best practice and evaluation

There are many examples of good practice in England which seek to support children's right to play and independent mobility in the areas where they live. Some examples of London Play's work are offered below. We continue to strive to ensure that children in London have access to more and better play opportunities, despite significant and mounting challenges in finding funding to support these initiatives.

²¹ <https://www.london.gov.uk/programmes-strategies/planning/implementing-london-plan/london-plan-guidance-and-spgs/play-and-informal-recreation>

²² <https://www.theguardian.com/cities/2019/mar/25/too-poor-to-play-children-in-social-housing-blocked-from-communal-playground>

²³ <https://www.theguardian.com/environment/2023/jun/29/most-children-live-flats-park-boarded-up-developers>

Play streets

When children playing in the street started to be killed and injured in large numbers, legislation allowing streets to be closed temporarily but regularly for the purpose of play was introduced. Play streets peaked in the 1950s but by the 1980s had all but disappeared. London Play has been working to put play back on the streets of London since 2008 and now more than two thirds of London's 33 boroughs offer this opportunity to their residents, potentially benefitting over a million children. Evaluations indicate that the positive outcomes of play streets are many and varied:

Increased independence: evaluations of London Play's Lottery-funded play streets projects (2014-17 and 2018-22) found that children had enjoyed increased independence with 73 per cent saying they felt more confident. Some 70 per cent of parents were happier to let their children play out because of play streets, while 83 per cent of children and young people said they play out more than they did before attending play streets.

Transformation of street space: London Play has been commissioned by the Mayor of London over recent years to support people to try out a play street for Car Free Day. In 2019 385 roads took part, creating more than 400,000sqm of instant play space²⁴ where before were cars, parked or moving.

Improved health: an evaluation of a play street project funded by the Department of Health²⁵ found that play street sessions tend to replace sedentary activities and contributed positively to children's overall activity levels: "Children were outdoors for a large proportion (>70%) of the time the streets were closed and spent on average 16 minutes per hour in moderate to vigorous physical activity per hour during street closures." The evaluation of London Play's Lottery funded project found that some 94 per cent of adults reported children get more exercise 'than usual' during play streets sessions.

Enhanced neighbour relationships and community cohesion²⁶: the Lottery evaluation found that 97 per cent of participants agreed that play streets bring diverse people together and unanimous agreement that community spirit and sense of belonging had grown.

While play streets are now on offer in most London boroughs and in many areas outside London, every council has a different application process; and they require adult supervision and intervention. We would like to see the process standardised and for all councils to 'presume' in favour of play streets wherever residents are willing to invest the time and energy to run them.

Play quarters ²⁷

This six-month pilot project aimed to transform the Palmers Green neighbourhood in the London Borough of Enfield into a place where children are welcomed by the community and can independently enjoy everything the area has to offer. London Play worked with play

²⁴ https://londonplaystreets.org.uk/our_news/400000-sqm-of-instant-play-space/

²⁵ <https://londonplaystreets.org.uk/wp-content/uploads/sites/3/2021/04/StreetPlayReport1web-4.pdf>

²⁶ <https://londonplaystreets.org.uk/wp-content/uploads/sites/3/2021/04/Hounslow-play-streets-for-cohesion.pdf>

²⁷ https://londonplay.org.uk/current_work/play-quarter-pilot/

street organisers, shop keepers, local schools, cafe owners, bus drivers, street scene workers, community policing teams, postal workers and others in the community, to raise awareness and understanding of the importance of independence in child development and how they could support it. The project included running play sessions with volunteers, walking buses to parks and play events. A series of neighbourhood 'Safe Points' were established; and a 'peer buddies' system created networks of children who could play together.

The evaluation found that 95 per cent of children agreed the activities were useful for helping them to get out and about in their area. Local stakeholders including businesses, non-profit organisations, providers of children's activities and venues were positively engaged, and a network of play champions and ambassadors had begun to emerge. London Play hopes to replicate and build on this model in future, dependent on funding.

Communities Unite for Play²⁸

This ongoing project invited children and adults to submit examples of 'London's Saddest Playground' and the submissions exemplify many of the issues highlighted above: neglect of existing playgrounds and tokenistic new ones being the dominating themes.²⁹ Children living near the playgrounds that got the most votes were asked what stopped them playing in them. Neglect (rubbish and graffiti), poor quality or damaged equipment and lack of use by others were the top reasons given. London Play is working with groups of residents around these playgrounds to campaign and persuade decision makers to invest in play.

Lewisham Play Strategy³⁰

London Play was recently commissioned by Lewisham Council to develop a play strategy for the borough to ensure that every child can exercise their right and need to play near to where they live. This document links and directs work by all council departments whose activities impact on children's relationship with spaces and places to play and the built environment – including transport, public health, education, community safety, environment, parks and leisure teams. London Play would like to see the development of a National Strategy for Play including a requirement that every local authority produces a play strategy.

Adventure playgrounds in Islington – protected in perpetuity

This example is from Islington Play Association and others in the London borough of Islington. Without a legal imperative to provide play opportunities for children, the land occupied by play spaces is at significant risk of being sold for development. In Islington, the land which the borough's 12 adventure playgrounds occupy has been legally protected in perpetuity for the purpose of play. All twelve spaces were dedicated through the Fields in Trust Queen Elizabeth II Fields Challenge. London Play would like to see this approach rolled out across London and further afield.³¹

²⁸ https://londonplay.org.uk/current_work/communities-united-for-play/

²⁹ https://londonplay.org.uk/our_news/south-london-playgrounds-are-saddest-in-the-capital/

³⁰ <https://lewisham.gov.uk/PlayStrategy>

³¹ <https://www.fieldsintrust.org/case-study-islington-adventure-playgrounds>

Voice for Young London

This initiative, which is under development by London Play, will support disenfranchised children to deepen their understanding of and engagement in democratic processes, politics and decision making. Starting on London's adventure playgrounds, many located in less affluent areas of the city where children can feel particularly excluded, playful opinion sessions will be held to collect views and amplify these with decision makers. This model has the potential to include decisions relating to planning policies, proposals and the built environment.

3 Cross Government working

There is significant overlap with other policy areas and cross government working is crucial to ensure that children have a positive relationship with the built environment. This has not been the case to date. Public health (the role of obesogenic/active environments, air pollution), transport (active travel, vision zero, road safety), education (active children, promoting citizenship) and police (antisocial behaviour, crime, safety) all have a significant role to play, and benefits to be gained, in promoting more child friendly built environments.

At a local level (as above) London Play as an organisation is supporting councils to develop borough-wide play strategies which look at play provision and access to it by the children as well as cross-departmental and inter-agency working to achieve more child friendly boroughs.

To achieve true cross-government working we support the call by the Children's Rights Alliance of England to create a cabinet minister for children³² – ensuring that children have someone at the highest level of government responsible for promoting their needs and rights.

Recommendations

We conclude this submission with a number of recommendations that we believe would help put the needs of children at the heart of spatial planning and urban development. In doing so this will create a public realm that works for children – and therefore everyone else too; including other groups who currently experience marginalisation in the built environment such as disabled people and the elderly.

- As above, a cabinet minister for children should be appointed with responsibility for promoting and protecting children's needs and rights.
- The government should work to enshrine the UN Convention on the Rights of the Child into domestic English law.
- This should include the introduction of a play sufficiency duty on local authorities (as is already the case in Wales and Scotland), with funding to support this. In doing so this will incentivise local authorities to better enforce the requirements and guidance set out in the London Play.

³² <https://crae.org.uk/news/no-one-responsible-children-heart-government>

- The government should implement a National Play Strategy to direct cross departmental coordination on ensuring that children can exercise their right to play and enjoy increasing independence and mobility as they grow, starting in their own neighbourhoods. This should include a directive to local authorities to develop local play strategies in line with this aim.
- The Department for Transport should standardise play street policies and procedures nationally, to bring all councils in line with one another and promote best practice in play streets.
- Equalities impact assessments should be routinely carried out on all proposed developments to gauge their impact on existing and new child populations.
- Existing play space should be protected with preservation orders similar to that used in Islington.