

# Raising the Nation Play Commission: a submission from London Play

October 2024

## About London Play

London Play is a charity, originally established in 1998, whose aim is to ensure that every child in London has the space, time and freedom to play outside daily near to where they live. It is largely a 'second tier' organisation which works by supporting frontline play providers, organisations and individuals with children in their lives to provide more and better play opportunities for children, focusing on the capital's least affluent neighbourhoods.

In particular, we champion the capital's 72 staffed adventure playgrounds and the playworkers who hold these spaces for children. These unique places provide us with a benchmark for what high quality play experiences look like.

We also work with resident and community groups, inspiring and supporting them to occupy and transform existing public spaces including streets, estate spaces and parks with regular play. We campaign for children's right to play and strive to influence decision makers at local, regional and national level to implement policy and practice in favour of play.

## The Commission on Play

It has recently been reported that children in the UK are the [unhappiest in Europe](#), underlined by a [crisis in child mental health](#). We believe that increasing free play opportunities is an easy, joyful and cost-effective way of helping to tackle this epidemic of misery. We know that play contributes to improved mental and physical health. More and better play will support the development of happier, more resilient and creative young people equipped for a successful future.

We are pleased to contribute to the Commission on Play and are hopeful that its findings will be influential with those who can effect change and improve the priority given to play in society.

We offer here some insights and recommendations for two key areas of interest for the commission:

1. How do we expand places and environments where children can play?
2. How can we use children's right to play to ensure national and local government support children's play?

## Q1 How do we expand places and environments where children can play?

The benefits of play for children and communities are widely evidenced but poorly understood or recognised by decision makers, too many of whom seem to persist in the view that play is unimportant, or frivolous.

London Play recently created a tool to help play campaigners make the case for investment in play to councils or other local decision makers. It provides a succinct summary of some of the more recent evidence showing how play contributes to various desirable social outcomes including improved physical and mental health, community cohesion and academic achievement among others. It is attached to this document, or click [here](#).

### 1.1 Existing places to play must be maintained, valued and protected.

Playgrounds in London and across the country are suffering an epidemic of decline – including those maintained by councils, housing providers and voluntary organisations.

#### Council maintained playgrounds and play services

In 2023 London Play carried out a [survey of the capital's local authorities](#) which spelled out a future of neglect for play services and infrastructure. While many councils reported that they were continuing to build new playgrounds, the funds to maintain them is not keeping pace. In over two thirds of councils, revenue budgets for play (ie maintenance, staff etc) were predicted to be static or declining in the coming three years – while costs continued to rise with the cost-of-living crisis and inflation. Our research is corroborated by others:

- [Three London boroughs feature in top ten play defunders](#): Play Gap report, 2024
- [England's playgrounds crumble as council budgets fall](#): Guardian, 2023
- [FOIs reveal a continuing decline in play park facilities in the UK](#): Aggregate Industries, 2023

#### Staffed adventure playgrounds

Our research also found that the capital has lost 12 adventure playgrounds in the past decade alone. London Play's 2023 survey of the 72 that remain – many run by small voluntary organisations – revealed that they are struggling for survival. Funding, staffing and maintenance were identified as their top three concerns for the future.

Adventure playgrounds provide top quality play experiences and a lifeline for children and communities in some of the least affluent parts of London. The playworkers who hold these places for children's play have a unique – but woefully undervalued – set of skills which is also in danger of being lost. They offer a beacon and a benchmark for all those interested in providing a quality play environment to aspire to, and we believe they must be protected.

#### Housing providers

Next to councils, housing associations are the biggest providers of public play facilities. It is clear that play provision on many housing estates is in a dire state. London Play is working with residents' groups on a number of estates where play equipment has been removed and not replaced, or cordoned off rather than repaired; and where housing providers threaten to raise service charges if they are pressured to improve play spaces.

As long as local authorities have no statutory duty to ensure that local children have adequate access to quality play opportunities, and while public budgets remain under pressure, existing play services and infrastructure will continue to be vulnerable to cuts.

- **Recommendation 1: Legal protection for existing play spaces**

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. Without protection or any statutory obligation to provide play opportunities for children, the land occupied by play spaces is at significant risk of being sold for development.

- **Recommendation 2: No loss of existing play space through development**

Land values in London make play space particularly vulnerable to development. The London Plan currently includes policies to protect biodiversity, including that new developments: "wherever possible, make a positive contribution to the protection, enhancement, creation and management of biodiversity." A similar requirement could be introduced to ensure that new developments "wherever possible, make a positive contribution to the protection, enhancement, creation and management of play space and opportunities for local children. A child impact assessment for any development that affects local children could compel developers to ensure that there is no net loss of playspace.

- **Recommendation 3: Support initiatives that inspire residents to demand better play provision and help them to influence local decisions in favour of play**

London Play's [Communities Unite for Play](#) project (funded by Trust for London) invited children and adults to submit examples of 'London's Saddest Playground'. The submissions exemplify many of the issues highlighted above: neglect of existing playgrounds and tokenistic new ones being the dominating themes. 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 has been working with groups of residents around these playgrounds to campaign and persuade decision makers to invest in play.

The combination of resident voices backed with London Play's expertise has proved highly effective in prompting positive change. Councils and housing providers have engaged in dialogue about the need for play; funding has been allocated and playgrounds improved in a number of boroughs.

## **1.2 Promote play in existing public spaces – on streets, on housing estates and in parks**

Some 80 per cent of public space is made up of streets, and private cars have been allowed to dominate this space in a way that largely acts to exclude children. Children are prevented from playing on their own doorstep and from independently accessing local play spaces due to the danger traffic poses. In a city where space is so limited, this is a clear social injustice.

The expansion of Low Traffic Neighbourhoods should have been good news for playing out but the focus on 'stopping traffic' rather than 'enabling' other, positive uses of street space has made them controversial.

Additionally, shared outdoor space – with or without play equipment – on many housing estates is rendered inhospitable for children and families due to factors including neglect, antisocial behaviour or poor connectivity between shared and private spaces needed for families to feel it is safe to let their children out to play.

- **Recommendation 4: The Department for Transport should standardise play street policies and procedures nationally to bring local authorities in line with one another and promote best practice.**

London Play has been putting play back on the streets of the capital since 2008, having unearthed dormant legislation created in the 1930s to ensure the safety of children playing out on their doorsteps. Now more than two thirds of London's 33 boroughs offer residents the opportunity to apply to open their street for play. Children get more exercise, make friends and neighbours of all ages and backgrounds mix informally.

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.

However, the process differs from borough to borough and in too many cases imposes a significant burden on organisers who are giving up their time and energy to benefit the whole community.

- **Recommendation 5: Support initiatives working with residents on housing estates, in LTNs and in and around local parks to bring back a culture of doorstep play.**

The parents of today's ten-year-olds have themselves have grown up in the 90s or early 2000s, at the dawn of the internet age and when children's independence and freedom was already shrinking. The culture of play intrinsic to past generations is being lost. Screens are alluring and real life play opportunities need to be equally engaging to tempt children out, and to remind them of the tangible pleasures of communal outdoor play. Targeted interventions to inspire and build confidence in communities can help to bring back a culture of play.

London Play recently worked with Tenants and Residents Associations on two Tower Hamlets housing estates to kickstart a culture of play which has now been enthusiastically adopted by residents.

### **1.3 Ensure the quality, quantity and accessibility of play provision associated with new developments**

Some of the worst examples of poor play facilities submitted to London Play's '[London's Saddest Playground](#)' campaign have been new 'tick box' playgrounds which meet the minimal spatial requirements but are bland and tokenistic.

#### **Recommendation 6: Monitor and enforce the guidance on play in the London Plan (and other regional spatial strategies)**

The London Plan's Supplementary Planning Guidance on Play and Informal Recreation includes some excellent guidelines on quantity, quality and accessibility of play provision. However, it is not legally binding and does not appear to be closely adhered to, monitored or enforced.

## Q2 How can we use children's right to play to ensure national and local government support children's play?

As the Commission website points out, unlike in Wales or Scotland, in England there is currently no statutory duty or legal imperative for public authorities to ensure that children have sufficient access to play.

At the national level, London Play supports the call by the Children's Rights Alliance of England to create a cabinet minister for children – ensuring that children have someone at the highest level of government responsible for promoting their needs and rights. Article 31 of the UNCRC should also be enshrined into domestic law.

London Play also supports Play England's call for the implementation of a National Play Strategy and for a Play Sufficiency Duty to be introduced in England, backed by ringfenced funding.

At the local level, London Play 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.

### **Recommendation 7: All local authorities to produce a play strategy**

A National Strategy for Play should include a requirement that every local authority produces a play strategy. Few local authorities have a current play strategy in place but this would be a significant step in ensuring that children can exercise their right to play, with cross-departmental support and acknowledgement of the benefits of play for a range of objectives.

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. L

Implementation of the strategy in Lewisham is being monitored by a cross-departmental Play Action Group and is already leading to joined up working and more transparent prioritisation of investment in play in the borough.

## **Conclusion**

The above examples and recommendations are not an exhaustive list but we hope they contribute positively to the work of the Commission. Please also refer to [our website](#), and also to our [submission to the DLUHC inquiry](#) earlier this year. We would welcome further discussion and involvement if this would be helpful. Thank you for considering our submission.

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