

Shaping Neighbourhoods: Play and Informal Recreation SPG Statement of Consultation

Respondent	Play SPG Reference	Policy/page/para	Comment	GLA Response & Amendments
Royal Borough of Kensington and Chelsea (RBKC), Kensington and Chelsea (K+C) play partnership, City of Westminster	General	general	A more user-friendly/easy to understand version should be produced. GLA should provide some training or commission a play organisation to help with the implementation of the guidance. SPG too long.	Noted. Efforts have been made to simplify and make the content of the SPG shorter. Support the idea of providing training to help with the implementation of the SPG but resources are not available at the moment.
Royal Borough of Kensington and Chelsea, K+C play partnership	5	CIL/S106	Provide practical guidance on CIL/S106 in terms of revenue costs and management costs.	Noted. Guidance on CIL/S106 added in chapter 5
Royal Borough of Kensington and Chelsea, K+C play partnership	5	Engagement	Provide guidance on how local authorities can engage with communities to design play spaces. Role for neighbourhood plans and how these could best be used to deliver pockets of play space.	Noted. Guidance added. Guidance on neighbourhood plans covered in chapter 5 and more will be provided in forthcoming guidance on Lifetime Neighbourhoods and Neighbourhood Planning
Royal Borough of Kensington and Chelsea, K+C play partnership	General	General	The document does not advocate guidelines for the size of play areas connected to developments.	Guidance on minimum size is provided in table 4.6
Royal Borough of Kensington and Chelsea, K+C play partnership	General	Free play space	It is not considered realistic to develop 'free' play space as it raises significant concern regarding health and safety requirements, opening hours of open space.	Noted. No change
Royal Borough of Kensington and Chelsea, K+C play partnership, City of Westminster	3	Schools	Opening school playgrounds - provide guidance on practical implications of the approach: Ongoing maintenance and children in premises.	Noted. Guidance provided in chapter 3 under school facilities

Royal Borough of Kensington and Chelsea, K+C play partnership	5	Local Play partnership	More guidance on Local Play Partnership	Agree. Text and case study added in chapter 5
Royal Borough of Kensington and Chelsea, K+C play partnership	5	Engagement	Children and young people can influence the planning process (design and accessibility). Children and young people who are involved and feel ownership of the play space will be far more likely to cherish and value the space in future.	Agree. Already covered
Play Link	4	Typology of play space	Welcome promotion of multifunctional playable spaces but guidance dilutes the potential clarity of its intent.	Noted. Clarification added throughout the document
Play Link	3, 4	Youth	Ball games area MUGAs are concentrated on physical activity and exclude most girls and boys who do not wish to participate in informal recreation. Limited 'offer'. Sceptical view on youth shelters.	Noted. Already covered but clarification have been added in chapter 3
Play Link, Freeplay	General	Photos	Equipment is over-represented in the current batch of photos in the draft.	Noted. New photos on informal play and natural play have been added
Play Link	3	Safety and security	See detailed changes	Agree. Suggested changes added in chapter 3
London First	3, 4	Indoor play space	In urban development sites, where space and land are often constrained, providing indoor space for 0-5 year olds maybe one way to provide sufficient play space. It does not appear that the SPG contemplates play space being provided indoors.	Noted. Reference added in chapters 3 and 4
TfL	3	Location and accessibility	Supports SPG and need to consider location and accessibility in the design of play spaces. See suggested changes.	Agree. Suggested changes added in chapter 3
TfL	3	3.8, 3.9, 3.10	Include statement which states that the location of play spaces should promote healthy travel options by providing cycle parking and being connected to walking and cycling routes	Agree. Text added in chapter 3
TfL	3	3.11	Expand paragraph to discuss barriers encountered on routes linking play spaces	Agree. Text added in chapter 3

TfL	3	3.19	Expand to specify continuous pedestrian and cycling routes, and reference to safety and security of the routes	Agree. Text added in chapter 3
TfL	3	3.29, 3.30, 3.31	Expand to include routes and links to play spaces.	Noted. Text added in chapter 3
TfL	4	4.1 and 4.38	Include reference to Pedestrian Environment Review System	Noted. Reference added in chapter 4
TfL	4	Table 4.8	Add stronger link between table 4.8 and location and accessibility in Chapter 3.	Noted. Link made
FHA play	General	general	Further research needed on privately managed public realm, access to play in high-density, mixed tenure, mixed-developments	Agree. Main issues are now covered
LB of Bexley	General	General	Support main aims of SPG and LTN section	Support welcomed
LB of Bexley	3	IP 9	The implication for maintenance and management should be taken into account	Agree. Text added
LB of Bexley	4	IP 10	Support that benchmark standard may be modified to reflect local circumstances	Agree. Text added
LB of Bexley	4	para 4.25	Concern that play space requirements for social rented housing may deter prospective of developers if threshold targets are likely to be met and viability of the schemes. No calculation for affordable rent.	Noted. Figures are interim awaiting 2011 Census. Too early to have reliable data specifically for affordable rent but as an interim measure will use same figures as for social rent; as they meet the same segment of housing.
LB of Bexley	4	Table 4.8	Table 4.8 is useful but could be too onerous on prospective of developers to provide in advance of a planning decision	It is not a requirement. Table amended
LB of Bexley		Para 5.15	Protocols and formulae for securing contributions should be set by local authorities	Agree. Clarification added in chapter 5
LB of Bexley	5	CIL	Helpful guidance	Noted. Support welcomed
City of Westminster	General	General	NPPF advises against supplementary planning documents unless clearly justified and the Council has fundamental concerns that the SPG is therefore not in compliance but City Council broadly supports and is encouraged by the aims of the SPG.	Noted. This is supplementary planning guidance to the London Plan rather than a local plan. It was clearly signalled in the draft London Plan and any in principle objection would more appropriately have been raised at its examination in public.
City of Westminster	Glossary	Glossary and para 3.18	Playable space - Not all of London's built environment is suitable for child's play e.g. busy shopping streets, transport interchanges	Agree. Text added
City of Westminster	Glossary	Glossary	Youth Space - What is the definition of 'hang out?'	Noted. Definition reviewed

City of Westminster	2	Para 2.23/2.24	Welcome principle of developing local benchmark standards: SPG that recognise that all areas are different and that there may be localised differences within boroughs is welcomed	Noted. Support welcomed
City of Westminster	3	Para 3.2	To mention the importance of future proofing for increased capacity needs	Noted. Covered in Chapter 4
City of Westminster	3	Para 3.3	Mention durable play equipment which is long lasting in situ	Noted. Reference added in chapters 3 and 4
City of Westminster	1	Imp pt 1	Should this Implementation Point state housing numbers which trigger the requirement for play space?	Noted. Text added
City of Westminster	3	Para 3.7	Use of trees and other greenery can provide shelter for play areas and also separation for older young people	Noted. Text added in chapter 3
City of Westminster	3	Hyperlink	Inclusive Landscape Design SPG (page 23) - Hyperlink does not work.	Noted.
City of Westminster	3	para 3.16	Management plans would be needed for any ancillary play facilities (e.g. baby changing facilities) to prevent them deteriorating over time	Noted. Text added in chapters 3 and 4
City of Westminster	3	Parkour	Suggest to include UK's first dedicated Parkour Park in a school facility (Westminster Academy)	Noted. Case study added in chapter 3
Parkour UK	3	Parkour	Parkour is doing some work on the use of public space for Parkour (and wider to include other sporting activities) and play	Noted. Text added in chapter 3
City of Westminster	3	Impl pt 9	Maintenance and management of space are critical	Noted. Text added
City of Westminster	4	Impl 10	Chances to develop large scale play space outside of Opportunity Areas should be encouraged where possible	Noted. Text added
City of Westminster	4	Photo sequence	Does not add anything to guidance	Noted. Explanatory text added and photos removed
City of Westminster	4	Para 4.42	Improvements to existing play facilities and/or an appropriate financial contribution secured by legal agreement is supported	Noted. Support welcomed
City of Westminster	4	Para 4.46	Doorstep playable space - a clearer definition needed explaining the proximity to the home	Noted. Reference added

City of Westminster	4	Para 4.51	Overshadowed/windy spaces etc should not be automatically discounted - they could be made worthy through innovative design	Noted. Text has been changed in chapter 4
City of Westminster	4	Para 4.52	Need to refer to the new theories being put into practice in road transport design – which take away barriers – this has a knock-on effect on the safety of some play areas where there are roads internal to developments	Noted. Covered in chapter 5
City of Westminster	4	Table 4.3	The age group 5-11 is too large to be meaningful in terms of proper play provision and needs to be split: 5-9, 9-11, 11-13, 13- 15.	Noted. No change. It is for the boroughs to decide
City of Westminster	4	Table 4.6	Add reference to parental/guardian supervision when playing and 'linear play space'	Noted. Text added in chapter 5
City of Westminster	4	Table 4.8	Boundaries - where barriers are necessary, and subject to the protection of visual townscape amenity, they should be attractive and not look utilitarian and purely functional. The kissing gate shown in picture on p15 of Islington's Inclusive Landscape Design SPD is a good example.	Noted. Text added in chapters 3 and 4
City of Westminster	4	IP 12	Supported. Consider early in the master plan play provision – add specific RIBA stages – B, C, D to emphasise the importance.	Noted. Text added in chapter 4
City of Westminster	5	Para 5.3	Provide examples of non-banal questions and ideas for engagement.	Noted. Text added in chapter 5
City of Westminster	5	para 5.6	Too vague on the use of the term 'community involvement'. Need to try and list who they might be and mention involving them early	Agree. Text added in chapter 5
City of Westminster	5	para 5.14	To add upgrade /maintenance costs into section 106 provision	Agree. Additional guidance provided in chapter 5
City of Westminster	Appendix	Appendix 3	Inclusion: Loss of dignity - need to be careful that this is not used to restrict active play – which of its nature has some inherent risks	Noted. Text added in appendix 3
City of Westminster	General	General	Opportunities which encourage the use of parks and open spaces for play (and active recreation more widely) are welcomed	Noted. Welcomed
City of Westminster	General	General	The need for opportunities which promote doorstep sport/ play are greater than ever (particularly within urban environments) and should be promoted through the planning process	Agree. Covered

City of Westminster	General	General	Organised / semi- organised activity is often a key part of an overall offer to maximise participation - ensuring 'people capacity' is important. Suggest to include case study on a 'ParkMakers' programme.	Noted. Reference added in chapter 5 and new case study
City of Westminster	General	General	The document is focused on children's play – it would be beneficial to also mention adult's play e.g. sports pitches, outdoor keep fit equipment	Noted. It is not covered by this SPG. It will be provided in the forthcoming Lifetime neighbourhood SPG.
Levitt Bernstein	3	Use of roofs	There is a notable increase in the use of roofs for shared amenity. It's often a last resort and the only way in which to meet the often demanding areas required by boroughs, egged on by the GLAs own unrealistic play targets. We have seen examples of roof-top play spaces for young children which could only work under strict supervision (and only therefore at designated times) and, even then, any ball games would be out of the question.	Noted. Text added on the importance of taking account of safety and supervision issues
LB of Richmond	General	General	Supports LTN, healthy lifestyles, access to nature, use of natural features, community involvement, volunteering.	Noted. Welcomed
LB of Richmond	4	Methodology and benchmarks	SPG to provide greater recognition that local circumstances and priorities allow for borough plans and policies to take a different approach where justified.	Agree. Additional clarifications added
LB of Wandsworth	General	General	SPG is supported. The advice is considered to be more realistic to the constraints of London, particularly inner London.	Noted. Support welcomed
LB of Wandsworth	4	Calculator	Assumptions are welcomed. Note need to be added. Add text to explain difference with 2008 figures	Noted. Text added
LB of Wandsworth	4	Calculator	Wandsworth Copyright or similar acknowledgement was added in Appendix 2 where text from the Wandsworth calculator has been inserted. It would seem sensible in this section to refer to possible future updates that the Council may wish to make to this calculator.	Noted. Text states that guidance are interim, awaiting for 2011 Census
LB of Wandsworth	5	S106	Welcome consideration of securing revenue for ongoing maintenance and responsibility for the same. Flexibility suggested in how developer contributions can be applied locally.	Noted. Text added

LB of Wandsworth	General	Playable space	The concept of Playable Space as distinct from Play Space is also helpful in terms of both Play and Community Safety	Noted. Support welcomed
LB of Tower Hamlets	General	General	Welcome SPG	Noted. Support welcomed
LB of Tower Hamlets	2, 3	2.18, 3.6, IM10	LBTH believes that it would be very difficult to map play spaces within the private domain.	Noted. Clarification added
LB of Tower Hamlets	3	IP2, IP4	All provision must be designed to be accessible to all and therefore there should be no need for a separate audit for play provision for disabled children.	Agree. Text amended
LB of Tower Hamlets	3	School	In case where schools permit use of their grounds, such spaces should not be considered as an existing publicly accessible play space within the walking distance prescribed in Table 4.4 and that the developers would still be required to provide for play space as per planning requirements	Noted. Text included
LB of Tower Hamlets	4	IM12	Incidental spaces may contribute towards providing play but will not be counted towards meeting the appropriate dedicated space standards	Agree
LB of Southwark	General	General	Support new draft and healthy and active lifestyles, access to nature, LTN, updated child yield figures.	Noted. Welcomed
NHS	General	General	Welcome the recognition of the contribution made by the provision of play space to healthier lifestyles amongst children, particularly linked to physical activity and childhood obesity	Noted. Support welcomed
NHS	1	NPPF	Add reference to NPPF	Noted. Added in chapter 1
NHS	2, 4	Table 2.1 and 4.6	Relationship between Table 2.1 London's public open space categorisation and Table 4.6 Playable Space Typology is unclear, particularly where parks can provide a range of formal and informal recreation activities for younger children and youths	Noted. Clarification added
NHS	4	IM 10	Add health status	Noted. Text added
NHS	3	Health	SPG should refer to the role of Health and Wellbeing Boards	Agree. Text added in chapter 3
Boyer planning	4	Affordable rent	Why no child occupancy rates in respect of new developments are provided for the affordable rent tenure?	As the child yields on affordable rent based on actual occupants are not yet available. We have made the assumption that the child yields for affordable rent tenure were the same as for

				social rent as the government's intention is that affordable rent should meet the same housing needs as social rent
LB of Haringey	3	Clapton Common Playground case study	Support SPG and raise the importance of seating for the community	Noted. Support welcomed. Text added
FCFCG	3	para 3.22	Calthorpe Project is a community garden	Noted. Case study added
Play England	3	Safety and Security	Correct reference to 'Play England's Managing Risk in Play Provision: Implementation Guide'.	Noted. Amended
Play England	4	Design	Add reference to Play England's Design For Play document and 10 Design principles.	Noted. Principles added
Play England	5	Engagement	Make reference to Play England and Participation Works produced a 'How to...' guide on engagement	Noted. Added
Play England	5	Engagement	Engaging young people in open space projects. Groundwork London recently produced guidance to support practitioners in engaging children and young people in the design and improvement of open spaces.	Noted. Reference added
LSDC		General	<p>Welcome the recognition of the importance and benefits of play in natural spaces and planned approach to exploring opportunities for this across London. Also • Role of school ground (P 3.19)</p> <ul style="list-style-type: none"> • Encouragement of innovative approach to play • Public spaces, parks and open spaces and their informal play opportunities and the ambition to transform them into multifunctional spaces meeting the needs of a wide range of people • Requirement for a plan based approach through play strategies • Encouragement on inspiring design 	Noted. Support welcomed
LSDC		General	Welcome reference to Sowing the Seeds report and say to list 12 recommendations and National Trust study ' Natural Childhood'	Noted. Recommendation 1 of the Sowing the Seeds report has been included as an Implementation point (see IP 7). A link to the report has been added for people to find out more about it.
LSDC		General	See list of suggested changes	Noted. Policy changes cannot be made, nor can the open space categorisation table be amended
LSDC		1.8	Parents and educators	Noted. Covered

LSDC		Figure 1.1 and Fig 2.2	Add All London Green Grid reference	Noted. ALGG referred to in chapter 1
LSDC		2.1	Add text on NPPF and green infrastructure and open/green spaces	Noted. Text added
LSDC		page 37	Add ref to natural play under risk-benefit section	Noted. Ref to natural play added in chapter 3
LSDC		page 41	Include case study on benefit of natural play in terms of maintenance. Often require low maintenance	Noted. Already covered in chapter 3
LSDC		para 4.6 open space categorisation table	Reference to open space categorisation table should be included as part of audit process (see recommendation on smaller non-linear spaces close to people's homes)	Noted
Free play	General	Chapter 3	Add picture of adventure playground that grow and change on a yearly basis. Adventure playground where young people are building there own play structure. Children to take control of their space	Noted. Photo added
Randlesiddeley		Chapter 4	Is it truth that you can exclude those units with private gardens from the child yield calculation?	Only for children under the age of 5
Randlesiddeley		Table 4.6	What is the difference between 'on-site doorstep playable space' and 'on site local playable space'	Refer to Table 4.6
Randlesiddeley		para 4.45 to 4.52 and table 4.6	Is there an official definition of LAP, NEAP and LEAP provided by London Authority? And what are the requirements for new residential developments?	Refer to Step B5 and table 4.6
Hammersmith and Fultham Disability Forum		Chapter 3	Support the principle of mainstreaming accessible and inclusive design advice for play and informal play provision for disabled children and disabled young people. Uneven level of guidance on access and inclusion in the SPG for developers and local authorities	Support welcomed
Hammersmith and Fultham Disability Forum		Chapter 3	Provide more case studies, photographs or illustrations of disabled children using accessible and inclusive equipment in an inclusive play space.	Noted. Photos and case studies have been added
Hammersmith and Fultham Disability Forum		Chapter 4	Chapter should provide guidance on meeting the needs of disabled children and disabled young people not just design on page 67. See recommendations	Noted. Text added in chapter 3 and appendix 3

Hammersmith and Fultham Disability Forum		Chapter 5	Chapter needs ensure play facilities are accessible and inclusive and can be used by disabled children. See recommendations	Noted. Text added
Mencap		Inclusion page 23	Quote the Equality Act 2010 and say that the spaces should be adapted according to the Act	Agree. Text added in chapter 3
Mencap		General	Add more pictures of inclusive equipment	Noted. Photos requested and added
Mencap		page 23	No mention of boundaries or fences	Noted. Sections added in chapter 3 under Safety and security and in table 4.8
Mencap		page 31	Show how school playgrounds can be adapted to take into account the needs of disabled children	Agree. Case study on Parkour case study
Mencap		Page 29	How can Parkour be adapted to suit the needs of disabled children or children with additional needs	Noted. See Parkour case study
Mencap		Appendix 3	Recommendations from KIDS should be made mandatory in all parks and open space	Noted. Cannot make it mandatory
Mencap		Page 23	More mention of disabled toilets required	Noted. Already covered in the document but references added
London Play		General	Welcome policy on LTN	Noted. Welcomed
London Play		General	London Play in the process of developing hidden gems of natural play spaces.	Noted. No change
London Play		CIL, page 77	Important that developers are made to accept responsibility for including adequate space of appropriate quality for all children who are to live there.	Noted. No change
London Play		Access to nature	Welcome playing in natural surroundings.	Noted. Welcomed
London Play		Volunteering	Welcome playing in natural surroundings. Social Action Fund, supported volunteering project taking nature to the street. Local people take initiative to create playable spaces in their neighbourhoods and offers support through innovative natural play ideas, for ex. willow-tree teepees to act as story telling places for children.	Noted. Welcomed
MLAUK			The requirement to provide play space in addition to private amenity space could discourage the provision of houses and gardens; given that private gardens are often larger and more expensive to provide than balconies and terraces and do not satisfy the requirement for play space.	Noted. No change
MLAUK			More guidance on integration of amenity and play space into high density and mixed-use development	Agree. Guidance on design issues added in chapter 4