

STATES OF JERSEY



ISLAND PLAN 2022-25: APPROVAL (P.36/2021) – FIFTH AMENDMENT CHILDREN’S PLAY SPACE

Lodged au Greffe on 8th July 2021
by Deputy L. M. C. Doublet of St. Saviour

STATES GREFFE

PAGE 243 –

After the words “the draft Island Plan 2022-25” insert the words “except that, in Policy C18 – Space for Children and Play, the following amendments should be made, with the Plan further amended in such respects as may be necessary consequent upon their adoption –

- (a) after the words “social and imaginative” insert the words “as well as helping children access and spend time in nature”;
- (b) in paragraphs 2 and 3 of the Policy, before the words “walking distance” insert the word “safe” every time they appear;
- (c) after paragraph 3, insert the following new paragraph:

“In the first instance, developers should seek to include as much green or natural play space as possible. Play space could also be provided as outdoor play equipment, playscapes (landscape design that incorporates play features), space for ball games and dedicated space that encourages safe bike riding, skateboarding and scootering. In some circumstances, indoor communal space may form part of the space for play contribution, such as communal games rooms or youth facilities. Other types of space for play will be considered where the developer has undertaken appropriate consultation and there is clear evidence of community support.”

DEPUTY L. M. C. DOUBLET OF ST. SAVIOUR

Note: After this amendment, the proposition would read as follows –

THE STATES are asked to decide whether they are of opinion –

to approve, in accordance with Article 3(1) of the Planning and Building (Jersey) Law 2002, as amended by the Covid-19 (Island Plan) (Jersey) Regulations 2021, the draft Island Plan 2022-25, **except that –**

- (a) **the following amendments are made to Policy C18 – Space for Children and Play:**

All new major development should consider how it will contribute towards helping children to be safe, active, social and imaginative **as well as helping children access and spend time in nature**. Design statements issued with development proposals must explain how this has been considered in the design stages of the development, from a placemaking perspective.

Development proposals providing between five-ten family homes (2+ bedrooms), are required to provide appropriate communal space for play on-site where possible, or otherwise make a

contribution to the provision of new or enhanced space for play within 10 minutes **safe** walking distance, or 1,000m from the site.

Development proposals providing more than ten family homes are required to provide appropriate communal space for play on-site, unless it is agreed that there are exceptional circumstances where an off-site contribution may be permitted; and/or when an off-site contribution will lead to a substantial betterment in provision and will be within 10 minutes **safe** walking distance, or 1,000m from the site.

In the first instance, developers should seek to include as much green or natural play space as possible. Play space could also be provided as outdoor play equipment, playscapes (landscape design that incorporates play features), space for ball games and dedicated space that encourages safe bike riding, skateboarding and scootering. In some circumstances, indoor communal space may form part of the space for play contribution, such as communal games rooms or youth facilities. Other types of space for play will be considered where the developer has undertaken appropriate consultation and there is clear evidence of community support.

Space for play must be delivered before the first occupation of the development, and this will be secured by planning condition.;

(b) the draft Island Plan 2022-25 be further amended in such respects as may be necessary consequent upon the adoption of (a).

REPORT

“A growing body of literature indicates that humans need contact with nature for their wellbeing, however at the same time young children are becoming increasingly separated from the natural world as their access to the outdoors diminishes... natural environments support children’s imaginative play, the development of positive relationships and allows for the environment to become a place of learning.”¹

Introduction

Policy C18 – Space for children and play (p.243) establishes the importance of play space in new developments as a means of addressing known gaps in health, wellbeing, learning and development through childhood and adolescence. It also upholds the commitment to put children first - and their right to play as per Article 31 of the UNRCR. The Plan also identifies that there is a lack of provision in the amount of designated play space accessible and available to children, especially in Town.

Data from the Report on Children’s Play Consultations 2011² shows that, after home, children like to play on the beach, in the park or in the woods, indicating a preference for natural or green play spaces over those provided within a development. However, Policy C18 as proposed does not sufficiently reflect these findings in directing developers to consider green or natural play spaces (or safe, walkable access to these kinds of spaces) in the first instance.

This amendment seeks to enhance the provision of Policy C18 by a) giving clear priority to the requirement for developers to deliver play spaces that are in the first instance ‘green’ or ‘natural’ over formal, built structures, and b) to ensure that walking routes to and from play spaces developed off-site are safe for children to use. This amendment also incorporates the detailed guidance in the preamble to C18 into Policy, giving greater weight to a broad consideration of types of play spaces that developers should consider when submitting plans.

1. The Benefits of Natural Play Spaces

Green Space and Physical Health

The benefits of unstructured nature play (defined as environments which have natural elements such as plants, rocks, mud, sand, gardens, forests and ponds/water)³ for children are manifold and well established in research. Evidence suggests that physical activity is generally higher in green spaces and BMI in children is lower when they have

¹ Nature and its Influence on Children’s Outdoor Play: Kellie Dowdell, Tonia Gray and Karen Malone (University of Wollongong/University of Western Sydney) Australian Journal of Outdoor Education, 2011

² See p.242 of the Bridging Island Plan

³ South Australia Department for Education and Child Development. Demonstration outdoor learning environments 2018 [Available from: <https://www.decd.sa.gov.au/teaching/projects-and-programs/outdoor-learning-environments/demonstration-outdoor-learning-environments>].

access to more green space^{4,5,6}. The Marmot report advocates that there should be green space within four minutes of every family home.⁷ Associate Professor Janet Dymnt from the School of Education at the University of Tasmania suggests that some of these physical benefits derive from the fact that it promotes a different type of play – for example, lifting rocks, climbing trees, and running through nature spaces are materially different from going on a slide or formal swing structure and lead to different outcomes in terms of physical and mental health.⁸

Green Space and Wellbeing

Multiple studies list the psychological benefits of outdoor natural play: children like natural places to relax after a stressful event, ADHD symptoms reduce and concentration in all children can be enhanced^{9,10}. Increasing opportunities for nature and risky play in outdoor settings has been shown to have significantly positive effect on the children's play, social behaviours and mental health, particularly in independent play and prosocial behaviours.¹¹ Early Childhood Educators observed improved socialisation, problem-solving, focus, self-regulation, creativity and self-confidence, and reduced stress, boredom and injury in those children who had access to outdoor play environments.¹²

Wellbeing may also be enhanced indirectly by green spaces via their potential to foster social contact, and the improved social and communication skills this can bring¹³. Professor Dymnt suggests that children are able to learn a number of social skills in nature play settings that are not present on manufactured play equipment – for example, queueing for a slide or swing may promote a hierarchical social structure favouring the stronger or older children, whereas nature play tends to have a socially levelling effect.¹⁴ This promotes language development, social skills of negotiation and listening, friendship development and responsibility.

Green Space and Caring for Nature

Research substantiates that an affinity to and love of nature, along with a positive environmental ethic, grow out of children's regular contact with and play in the natural

⁴ Marmot M. Task Group 4: The Built Environment and Health Inequalities 2009

⁵ Muñoz S-A. Children in the Outdoors 2009

⁶ Lachowycz K, Jones A. Obesity Prevention: greenspace and obesity: a systematic review of the evidence. Obesity Reviews. 2011

⁷ Marmot M. Task Group 4: The Built Environment and Health Inequalities 2009

⁸ <https://www.firstfiveyears.org.au/early-learning/the-benefits-of-nature-play-for-children>

⁹ Evans GW. The built environment and mental health. Journal of Urban Health. 2003;80(4):536-55.

¹⁰ Steuer N, Thompson S, Marks N. Review of the environmental dimension of children and young people's well-being Sustainable Development Commission, NEF 2006

¹¹ <https://www.sciencedirect.com/science/article/abs/pii/S0272494417301512#!>

¹² <https://www.sciencedirect.com/science/article/abs/pii/S0272494417301512#!>

¹³ Natural England. Wild Adventure Space: its Role in Teenagers' Lives. 2010 [cited 2010 20 May]. Available from:

<http://naturalengland.etraderstores.com/NaturalEnglandShop/NECR025>.

¹⁴ <https://www.firstfiveyears.org.au/early-learning/the-benefits-of-nature-play-for-children>

world^{15,16}. Giving local children and young people the opportunity to participate in the design of local green spaces also provides a positive sense of control and ownership that can also reduce the chances of subsequent vandalism.¹⁷

Developing Green Play Spaces

Unfortunately, opportunities for nature play are not equally available and accessible to all children, particularly those from lower-income households and living in high density apartments. This is a particularly acute problem in Town, where the lack of available play space has been formally identified in the [St. Helier Open Space: Audit Summary \(2018\)](#).

Creating clear guidance which encourages developers to favour high quality outdoor play spaces over play equipment is a simple and effective way of boosting outcomes for children and young families who are particularly affected by living in built-up areas. This need not be a prohibitively expensive or development heavy. [Child Friendly Cities](#), a UNICEF-led initiative that supports municipal governments in placing the rights of children at the heart of local community development, is clear that spaces where all children feel welcome and have access to loose parts (such as sticks, rocks, water, cardboard boxes) that allow their imagination to shape the play are as important as expensively designed play structures.

2. Safer Access to Natural Play Spaces

Policy C18 proposes a benchmark for off-site play spaces being no more than 10 minutes walking distance, or 1,000 metres away from the site, but this does not preclude developers from providing an access route that includes traversing a busy main road with intermittent pavement, or multiple lanes of traffic.

Child Accident Prevention Jersey state that children receive very little training on how to cross the road, and mainly learn from example – often by copying their parents and friends. In Jersey, around 20-30 children per year are hit by a car and go to hospital. Children as old as 11 can struggle to judge speeds and distances of cars as accurately as an adult can, and it is often difficult for drivers to see the children.¹⁸

Significantly, the most common time of an accident involving a child is between 7am and 1 pm or between 3pm and 6.00pm.¹⁹ The after-school period clearly coincides with the spike in road traffic collisions involving children, many of whom will be accessing a play space in that time. It is therefore critical that routes from family homes to off-site play spaces are safe for children to use unaccompanied by an adult. The more confidence caregivers have that their child can access the play space safely, avoiding major roads and busy traffic areas where possible, the more likely they are to encourage use of that play space, and the greater the beneficial impact on the children as outlined above.

¹⁵ Phenice, L. & Griffore, R. (2003). Young Children and the Natural World. *Contemporary Issues in Early Childhood*. 4(2), 167-178

¹⁶ Schultz, P. Wesley, Shriver, Chris, Tabanico, Jennifer J. & Khazian, Azar M. (2004) Implicit connections with nature. *Journal of Environmental Psychology*, 24(1), 31-42

¹⁷ Beunderman J, Bradwell P, Hannon C. Seen and Heard. www.demos.co.uk: DEMOS 2007

¹⁸ <https://www.cap.je/pedestrians/>

¹⁹ <https://www.cap.je/pedestrians/>

Research supports the concept of designing the built environment with children's accessibility in mind. [Arup proposes](#) that children's ability to move around their environments independently, as well as the time children spend in outdoor play, are key indicators of a town or city's health. The US National Association of City Transport Officials [outlines street design principles for children](#), and identifies that streets for children should be:

- Safe and healthy – removing or minimising risk to life-threatening conditions, and promoting physical and mental wellbeing for kids and caregivers
- Convenient and comfortable – more enjoyable to use, with opportunities to sit, rest and chat, providing shade, shelter and facilities like toilets where possible
- Inspirational and educational – have spaces for learning, development and play through images, colours, textures and games²⁰

On island, recent consultations to develop safer routes to schools (for example, in [St Saviour](#) and [St Brelade](#)) have shown that there is a growing consensus that the built environment must be adapted to meet the needs of children and their caregivers on the school commute, and this thinking must be extended to new developments incorporating off-site play areas. Not only are safer access routes to play areas better for children and caregiver's mental and physical wellbeing, but the principles also align with Government commitments such as the [Active Jersey Strategy](#) (2020) and [Sustainable Transport Policy](#).

Financial and manpower implications

The financial implications of this amendment would be directly linked to the costs and location of new builds. All building contractors should be aware of the new requirements which are anticipated.

Child Rights Impact Assessment review

This amendment has been assessed in relation to the [Bridging Island Plan CRIA](#). The amended clause reinforces the issues identified with regards play space and would be beneficial to children.

The amendment further reinforces the terms of Article 2 of the United Nations Convention on the Rights of the Child – that Children's Rights should be applied to all children without discrimination, especially those who have limited access to green or natural play space, or live some distance from the nearest play space.

This amendment supports Article 31 of the UNCRC:

1. States Parties recognize the right of the child to rest and leisure, to engage in play and recreational activities appropriate to the age of the child and to participate freely in cultural life and the arts.
2. States Parties shall respect and promote the right of the child to participate fully in cultural and artistic life and shall encourage the provision of appropriate and equal opportunities for cultural, artistic, recreational and leisure activity.

²⁰ <https://globaldesigningcities.org/wp-content/uploads/guides/designing-streets-for-kids.pdf>

Re-Issue Note

This amendment has been re-issued due to a wording error. In place of “Play space should...”, the amendment now reads “Play space **could also be...**”