

<b>ORGANISATION</b>	<b>LONDON FIRST</b>
<b>ID</b>	<b>1588</b>
<b>MATTER</b>	<b>M54 PLAY AND INFORMAL RECREATION</b>

**M54. Would Policy S4 address strategic matters of London wide importance relating to play and informal recreation? In particular:**

**a) Would Policy S4 provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans in relation to play and informal space?**

1. London First supports the approach to assessing need for play and informal recreation provision as set out in Policy S4A of the draft Plan, including audits by the boroughs of existing provision and strategies supported by Development Plan policies. In these terms, Policy S1 is considered to provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans in relation to play and informal space.

**b) In light of the need for increased densities and differing local contexts, would requirements as set out at Policy S4B2 be justified, particularly a space standard per child for accessible on site play provision? Overall would it provide sufficient flexibility to reflect local circumstances?**

1. S4B2 in the draft Plan is another example of an overly prescriptive policy that is inappropriate for a spatial development strategy covering the whole of Greater London. London First supports the provision of good-quality, accessible play provision in new housing developments and such facilities become increasingly important in areas that have been identified for high-density intensification.
2. However, it is considered inappropriate for the Mayor to apply a blanket standard of a minimum 10 square metres of play provision per child across all locations from the City of Westminster to the London Borough of Bromley and for all development types of residential development. The boroughs should have discretion to devise their own standard according to local need and locational characteristics.

3. Each site is different and will face different challenges relating to its context, position, orientation, and the mix and type of uses. It is important that local standards are devised to meet play and recreation needs whilst supporting good design and enabling development in that particular location.
4. Impact on development viability is an important factor. Delivery of new play and informal recreation provision will generally be through Section 106 (S106) legal agreements or sometimes the Community Infrastructure Levy (CIL) in large-scale regeneration areas, such as Opportunity Areas. This is a contributory factor to the cumulative impact on development viability and must be carefully balanced with other Section 106 expectations, including affordable housing delivery.
5. Transparency over how S106 and CIL monies are spent is key to obtaining local community support for new development. For instance, if financial receipts are secured for expenditure anywhere in the borough and the existing local community do not see any direct benefit for their particular play and recreation facilities, this can undermine a community's confidence in the planning system, and residents are more likely to resist new development in their area. This issue is likely to become increasingly pertinent with the intensification of the outer boroughs proposed by the draft Plan. Demonstrating local benefit and transparency in how money is spent is critical to the delivery of the Good Growth strategy.
6. For the reasons set out above, London First submits that Policy S4B2 should delete the blanket requirement for a minimum 10 square metres of play provision per child across London. Instead, S4 should give the boroughs discretion to devise their own local standard and it should also contain more practical guidance on issues of delivery and funding in order to provide a more effective strategic policy.