



Development Department

Your reference: Play and Leisure Implementation Plan

Our reference: #114441

Being dealt with by: David Purchase

Date: February 2010

Tel: 02890 320202 ext 3792

Policy Secretariat
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Dear Sir or Madam,

RE: Consultation: Play and Leisure Implementation Plan

Please find attached our provisional response to this consultation document. Please note that this is still subject to final ratification by full council.

Provisional Response

1.1. Overall comments

- 1.1.1. The City Council is fully committed to supporting children and young people and has this as a corporate priority. This can be seen by the substantial resources allocated to play and leisure services. In the context of play alone, Council invests some £1m annually in the inspection, maintenance and equipment replacement in 78 playgrounds across the city. A further £650k is planned in capital works. Council also deploy 16 play workers in 6 dedicated play centres and other sites across the city, representing a further investment of £650k per annum. In addition we operate and maintain 10 leisure centres and all the cities parks.
- 1.1.2. It is reasonable to assert, therefore, that in supporting the broad thrust of the policy and its underpinning principles, Council is already providing significant support to the OFMDFM's Play and Leisure Policy. Consequently we are concerned that implementation of OFMDFM's plan appears to require additional financial and staff resources from BCC despite the issue being raised throughout the working group process. Thus far, the only additional resources made available by central government (via PlayBoard) has been to support Councils establish play partnerships and formulate strategic plans. The initial funding deadline has now closed and it is uncertain if further funding will be made available.
- 1.1.3. Councils are expected to take the lead role in developing and coordinating the proposed Play and Leisure Partnerships but the structural approach, as proposed, may not be appropriate to Belfast. The adoption of a standard structure, based on the inclusion of a wide range of statutory, voluntary and community organisations, may be unnecessarily cumbersome in the particular context of Belfast City Council. In particular the plan tends to refer to "Play and Leisure" as a unitary concept. Within City Council, however, the structural organisation of 'play' and 'leisure' are as distinct functions and are already 'embedded' within existing service provision - unlike many other Councils.



- 1.1.4. There may also be difficulties with the Play and Leisure implementation plan as Council has virtually completed its planning and financial cycle for 2011-12. As such there is a concern that corporate, departmental and service plans will have been completed with no linkages to actions contained within the OFMDFM plan.
- 1.1.5. Finally, the form used for consultation feedback is very restrictive for feedback. Hence this covering letter and modification of the consultation response template. In seeking to encourage consultation the process should be more user-friendly.

1.2. Comments on specific sections of the implementation plan

- 1.2.1. *Introduction: Barriers to Play & Leisure* - The Council agree and endorse the following points contained within the introduction:
- that factors such as a loss of open space and under investment in parks and playgrounds significantly increase barriers to play; and
 - that there are limited opportunities for children with disabilities or additional needs.
- 1.2.2. The latter point is something the Council is specifically working towards with regards to outdoor play space. The Council will take cognisance of these points when developing its future strategies, plans and development programmes (i.e. pitches strategy, Active Belfast and Open Spaces strategy and citywide participation plan).
- 1.2.3. *Section 1.3: Who is the implementation plan for?* - The Council agrees that partnership working is key to delivering success and we would welcome the opportunity to explore the potential for greater partnership working in the future particularly in relation to play provision and enhancement.
- 1.2.4. The plan also alluded to the fact that an investment of almost £9 million had been allocated to enhance existing play and leisure facilities. Our Parks & Leisure department would be keen to establish exactly how much of this funding was invested in the Council's sites.
- 1.2.5. *Section 2.1* - This section defines and describes play as 'freely chosen'. Perhaps the current situation with European safety compliance for equipment/ surfacing and access can limit this 'free' choice. Within the Council we are considering a move towards more environmental/ natural play spaces where children can play in a more imaginative way.
- 1.2.6. *Section 2.2* - Under the principle of accessibility, the plan states there should be 'sufficient provision'. The definition of what 'sufficient' means is not referred to within the plan. The department would be keen to find out what this standard is and how it is actually measured. The Parks and Leisure facilities are accessible to all but some people have the perception that it is not safe for them to use facilities in particular locations.
- 1.2.7. Under the principle of inclusion the department would also suggest that the views of children should be considered and incorporated into the overall consultation process when developing play facilities. The Council uses its Youth Forum to seek young peoples input and views and to consult on a regular basis.
- 1.2.8. *Section 2.3 - Child and Young Person friendly Communities* - This section has strong links with the council's shared space agenda and would advocate that our leisure centres, parks, pitches, cemeteries and the Belfast Zoological Gardens are shared spaces for all.
- 1.2.9. *Access to Spaces & Places* - The Council through the provision and programming of quality parks and open spaces and leisure environments provides perfect places and opportunities for children and young people.
- 1.2.10. We would endorse the statement that 'local neighbourhoods' are to be planned and designed with children and young people. The department would like clarification on whether this will be managed through the Neighbourhood Partnership Boards, how will this actually be done and what are the implications for the council? The Council would also like to emphasise that design is complementary to the open space and environment.



- 1.2.11. *Section 2.4: Partnership Working for Play & Leisure* - This section mentions that local play and leisure partnerships are to be established but the department feels that there is not enough clarity about how this would function and what our role and contribution would be. As mentioned in the introduction, we have concerns that the standard approach may not suit the Council, where play and leisure services are provided across more than one department.
- 1.2.12. *Section 2.5: Monitoring and Evaluation* - The Council feels that the monitoring and evaluation section is quite weak and that monitoring and evaluation of the plan is as important as the delivery of it. It is vital that a performance measurement framework (containing key performance measures) is developed at the outset. The section refers to the fact that OFMDFM will develop an indicator set which will measure the delivery of the outcomes – the Council would welcome the opportunity to be consulted on this.
- 1.2.13. The Council also queries whether an annual review of the plan will be sufficient.

1.3. Responses to the specific questions

- 1.3.1. We have used the template you provided for specific responses. Please see the following pages.

Thank you for asking us to respond to the proposals.

Yours sincerely

David

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Consultee information

I am responding as:

An individual

on behalf of an organisation

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Key Action Areas

The draft play and leisure implementation plan has identified 4 key areas on which we want to take action. These are:

- **Places and spaces for Play and Leisure**

This seeks to provide well designed places and spaces where children and young people are welcomed.

- **Championing Play and Leisure**

This seeks to promote and encourage the benefits of play with a wide range of stakeholders, professionals, parents, children and young people in order to ensure that the voices of children and young people are heard when it comes to their play and leisure experiences and opportunities

- **Access to Play and Leisure**

This seeks to make opportunities for play and leisure accessible and welcoming for children and young people regardless of ability or disability.

- **Workforce Development**

This seeks to ensure that those involved in planning and delivering play and leisure are fully developed to do so effectively.

Question 1: Do you agree/disagree with the 4 key action areas outlined in draft plan?

Strongly Agree	Agree	Neither Agree or Disagree	Disagree	Strongly Disagree
			X	

Please provide details of any key action areas which you think should be omitted

Please provide details of any additional action areas which you think should be included in the plan

The main focus of the plan is on 'open space' provision for play and leisure. Playwork and staffed play provision has little mention.

Our vision, key aims and underpinning principles

Key Impact Areas

A number of impact areas have been identified under each key action area.

Under **Places and spaces for Play and Leisure** the following key impact areas have been identified:

- Planning and design to promote play and leisure, making it inclusive and accessible to all
- Public Spaces create a welcoming environment for all children and young people
- Influencing professional practice in building and design
- Promoting the conversion of unused land into viable play and leisure spaces



Question 2: Do you agree/disagree with the key impact areas outlined in the draft plan under places and spaces for play and leisure?

Strongly Agree	Agree	Neither Agree or Disagree	Disagree	Strongly Disagree
	X			

Please provide details of any key impact areas which you think should be omitted

Within the action plan there is reference to the use of child friendly, accessible evaluation tools for measuring satisfaction levels. The Council would be keen to find out what they are and how the information will be useful for us.

One of the key actions within the action plan is to take forward an audit of unused/ vacant space within a council pilot area. An audit of all open space within the city was commissioned by the Council in recent years. There may be some transferable information within this report that could be relevant.

The action plan also mentions a professional bodies working group to develop design standards – this is something that the Parks and Leisure Department would be keen to get involved in.

Please provide details of any additional impact areas which you think should be included

Planning and design needs to promote play and leisure - The Northern Ireland Planning Service has a statutory duty to consult the relevant Council about every planning application it receives and to consult the Council during the preparation of a development plan. Councils have the potential for major influence in ensuring there is space allocated for children to play.

Public Spaces create a welcoming environment for all children and young people - BCC could support this through: Training for staff who plan playgrounds; development of partnerships with community groups; using staff to conduct consultations and evaluations with children; Play staff involved in projects in open spaces

Influencing professional practice in building and design - This should form part of the main work of the Play and Leisure Partnerships.

Promoting the conversion of unused land into viable play and leisure spaces - This would involve additional resources both for initial development and then for long-term maintenance. The Council would be seen as the main provider for this. Consideration would need to be made of alternative ways to use land through the Play and Leisure Partnerships.

General - Reference should be made to an action which looks at promoting play across boundaries within this area.

Under **Championing Play and Leisure** the following key impact areas have been identified:

- Implementation of Play and Leisure Policy across the NI Executive
- Engaging and involving children and young people
- Promote a greater recognition of the benefits to be gained from play and leisure with parents
- Strategic Planning
- Promote quality standards in registered provision
- Embedding of play and Leisure Policy within schools and youth provision



- Increase the extent to which all children and young people encounter challenge, stimulation and acceptable levels of risk in their experience of play and leisure

Question 3: Do you agree/disagree with the key impact areas outlined in the draft plan under championing play and leisure?

Strongly Agree	Agree	Neither Agree or Disagree	Disagree	Strongly Disagree
	X			

Please provide details of any key impact areas which you think should be omitted

While Council does not necessarily disagree with the actions proposed, it should be noted that many of the activities suggested are already performed by Council and we would not be keen to drop existing proven processes for an as yet unproven approach. Areas this might affect include:

- A lobbying role.
- consultation mechanisms
- Strategic plans to implement Play and Leisure.
- Reviewing existing quality.
- Reviewing service provision.
- Working with local community groups to promote greater recognition of the benefits from play and leisure with parents.

Please provide details of any additional impact areas which you think should be included in the plan

One of the actions relates to providing financial support to Councils to facilitate the development of strategic plans – the Council would welcome this type of support to ensure the principles of the play and implementation plan are embedded at council level and included in any future corporate and departmental strategies and plans. The action plan makes reference to researching and promoting existing quality standards, the Council would be keen to know which standards the action is referring to and it would be clearer if this was stipulated as part of the action.

Under **Access to Play and Leisure** the following key impact areas have been identified:

- Children and young people's rights
- Promote a greater recognition of the benefits of play and leisure with parents and the wider community
- Enable children and young people to travel to, and access their local play and leisure spaces safely

Question 4: Do you agree/disagree with the key impact areas outlined in the draft plan under access to play and leisure?

Strongly Agree	Agree	Neither Agree or Disagree	Disagree	Strongly Disagree
	X			

Please provide details of any key impact areas which you think should be omitted



Please provide details of any additional impact areas which you think should be included in the plan

The action plan area 3 makes reference to promoting the use of play services by an assessment of inclusive play – this is something the Council would be keen to build into future independent playground inspections as it is essential to improve the opportunities for disabled users across the city.

This aim will focus on undertaking an assessment of existing services to determine access and inclusion. A baseline would need to be established with agreed criteria. Accessibility will differ for children coming from different economic and cultural backgrounds; abilities; age and developmental stage; and area they live in. For children in Belfast a play facility in the next street may be inaccessible due to the political makeup of neighbourhoods or to a child’s background.

There is a recommendation to establish safe and accessible travel routes through 2 pilots. This could be obtainable through developing partnerships with organizations like Sustran.

Under **workforce development** the following key impact areas have been identified:

- Appropriate and accessible training/ qualification opportunities are available for those working with children and young people within the play & leisure sector
- Promote the aims and objectives of the play and leisure policy to those involved directly or indirectly with children and young people

Question 5: Do you agree/disagree with the key impact areas outlined in draft plan under workforce development?

Strongly Agree	Agree	Neither Agree or Disagree	Disagree	Strongly Disagree
	X			

Please provide details of any key impact areas which you think should be omitted

Again, while Council does not necessarily disagree with the actions proposed, it should be noted that many of the activities suggested are already performed by Council and we would not be keen to drop existing proven processes. For example, BCC currently ensures all Playstaff are trained to NVQ level III in Playwork. Additionally, short-term courses are offered through the play service for community groups, community development staff and summer scheme workers.

Please provide details of any additional impact areas which you think should be included in the plan



Actions in the plan

There are actions detailed in the draft plan which relate to both the action areas and impact areas.

Question 6: Do you agree/disagree with the actions outlined in draft plan?

Strongly Agree	Agree	Neither Agree or Disagree	Disagree	Strongly Disagree
	X			

Please provide details of any actions which you think should be omitted

Please provide details of any additional actions which you think should be included in the plan

Please provide any other comments you wish to make

In general the implementation plan may need to be tightened up. Although we appreciate that this is part of the purpose of consultation, the Council recommends that each action requires allocated resources and key performance measures need to be outlined for each of areas. The Council also suggests that each action has specific delivery partners assigned to them where appropriate to ensure accountability and continuity of delivery.

Confidentiality and Access to Information Legislation

Information provided in response to this consultation, including personal information, may be published or disclosed in accordance with access to information legislation: these are chiefly the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004 (EIR).

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