

18 November 2016

Draft Play Spaces Policy  
Parks, Sport and Recreation  
Wellington City Council  
P.O. Box 2199  
Wellington 6140  
playspaces@wcc.govt.nz

**Re: Draft Play Spaces Policy**



Margaret Mahy Playground, Christchurch

This submission is from the Architectural Centre, an incorporated society dating from 1946, which represents both professionals and non-professionals interested in the promotion of good design.

1. We strongly support the council's continued commitment to providing *"a network of dedicated, free outdoor play facilities across the city"* (p. 7). We consider that physical play has become even more important with the increased use of mobile technology by children.
2. We appreciate the draft policy's acknowledgement that play spaces need to be understood within the wider context of open and green spaces and the WCC's Open Spaces and Recreation Framework (p. 4).
3. We also support the sentiment from the panel survey recipient who stated that: *"Life is about accepting a bit of risk and diversity"* (p. 10), and note that safety is usually the concern of parents and seldom the concern of kids.



"Woods of Net" Pavilion, Hakone Open Air Museum, Japan, Toshiko Horiuchi MacAdam



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4. We endorse the draft policy supporting multifunctional spaces and the need to provide a range of play spaces (p. 7). We consider a play space to be pretty much anywhere that someone can enjoy themselves doing something. As an example, one of our members is currently designing a school in Christchurch which has no "playgrounds," but instead uses the surrounding streets as playgrounds/workshops/places to learn. Considering organised play areas alone limits the interpretation, and we support the policy's explicit statements acknowledging this broader understanding of play spaces including: "incidental play space" and "playable space" (e.g. pp. 7, 34).
5. We also appreciate the draft policy's identification of: cognitive, creative, social/dramatic and physical active play, acknowledging the relationship of play to human development and learning.



Crocheted Playgrounds, Toshiko Horiuchi MacAdam (left: Harmonic Motion, Museo d'Arte Contemporanea Roma, 2013; right: "Woods of Net" Pavilion, Hakone Open Air Museum, Japan)

6. While we acknowledge the appropriateness of the draft policy identifying that some "[s]hopping centres often have dedicated play spaces" (p. 7), we consider that because these are commercial spaces, and so ultimately not public in the fullest sense, they should not be considered to be fundamental to the play spaces network. In saying this we are not denying the potential for indoor spaces to also provide important playground spaces.
7. The draft policy's acknowledgment that children "*now lead more structured and supervised lives with less emphasis on spending time "mucking about"*" (p. 8) suggests to us the importance of, not only "incidental playable space" (p. 7), (which the policy provides as an example: "*the road reserve network - particularly on routes where children walk to school*" (p. 34)), but also the need for the council to pro-actively address parental anxiety about child safety, which has led to increased structure and supervision, as well as significant reductions in children walking, cycling or busing to school.
8. We note that the draft policy's Strategic Priority 4 (The city as a play space) states that "*All upgrades to public space should consider opportunities for incidental play space and celebrate the notion of the city as a play space*" (p. 34). We strongly support this intention but are disappointed that the draft policy translates this into a single action to explore opportunities for skateable "spots." Explicit guidance is needed to enable the more ambitious statement regarding upgrades to public spaces. In addition, a commitment not to degrade existing public space as play space is needed. An example is the recent Island Bay cycle way which conceived of existing footpaths and road reserves narrowly in terms of pedestrian transport reducing footpath width at points, further limiting any opportunities these footpaths have to facilitate play.

9. The draft policy notes that 45% of people drive to playgrounds, and only 41% walk and 10% bike/skateboard/scooter (p. 9). We encourage the council to directly address the high use of private cars as transportation to play areas. We also encourage the council to map the relationship between the playground network (including bike skills infrastructure (p 29)) and public transport routes and the cycle lane network, and better support an interconnection between these in order to facilitate greater use of active and sustainable modes.



10. Equally we discourage the council from investing land and funds on carparking that is located within playgrounds. In addition to the inclusion of carparks undermining progress on climate change, they are also probably the most dangerous item on playgrounds and are certainly the most de-humanising. Cars, especially when reversing, are lethal and very scary to children. We encourage the council to extend its Travel Demand Management (TDM) thinking to include transportation to play spaces, supporting work currently focussed at increasing the number of children walking or cycling to school. Strapped into car-seats, and being locked in cars, is a very limiting experience for children which does not promote spontaneous, free experiences, in contrast to active and sustainable transport modes.



Margaret Mahy Playground, Christchurch

11. We note the draft policy's assumption that there will be no need to provide any additional playgrounds over the next 20 years due to the small increase in children projected in Wellington (p. 25; also p. 26), and that the medium-density residential housing areas (MDRAs) are also *"unlikely to require new formal*

playgrounds" (p. 13). We stress the need for the council to at least retain the current park:residents and park:children ratios (1/1800 and 3.2/1000 respectively) (p. 17). The provision of open and green spaces must pre-empt increased residential density to ensure Wellington's attractiveness as a place to live. Clearly the Open Spaces and Recreation Framework will also be key to ensuring this.



Tezuka Architects, Fuji Kindergarten, Japan

12. We consider that "warm shade," dappled light via trees, and shelter provided by structures such as large verandahs are important to keep areas dry and reduce sun-burn, while supporting sufficient sun exposure for vitamin D. We also note that provision of more shade has been identified as a need for existing playgrounds (p. 9), but that the policy highlights the expense of providing shade structures (p. 10) and states that: *"there is currently no funding to provide the tree, a tree cage and to plant and maintain it for the first 5 years. Amenity planting often needs high maintenance, particularly if it is designed to be played in and amongst"* (p. 20). This must be rectified. We support the draft policy's acknowledgment of the value of trees that enable "seasonal shade," which will provide shade during summer and allow sun in the winter months (p. 10). We refer the council to the Cancer Society's Sunsmart Schools "Shade Structures" guide (<http://www.sunsmartschools.co.nz/shadestruc.pdf>), and consider that this document ought to be referenced in the policy.
13. In addition to pro-active provision of shade, we also point to the need for wind shelter, and the potential for wind to be a source of play. We consider that designing for these environmental aspects of sun and wind is more important than, for example, views and landscape features, which may be appealing for parents and caregivers but are often less interesting to children.
14. We also point to the recognised impact of climate change on climate variability, sea level rises and increased frequency of extreme weather. A number of playground sites appear to be in close proximity to coastal locations, and in exposed locations. There appears to be no climate change resilience inherent in the draft policy. In a related vein, how do the locations of playgrounds relate to the GWRC earthquake hazard map? We encourage the council to review playground on sites vulnerable to climate change, earthquake, tsunami or other natural or human-made hazards.


15. In closing we note that the most popular places for young UK children in 1969 were the sandpit and very shallow (non-drowning) paddling pool, or mud bath. We strongly suspect that the tactile appeal of mud, sand and water have declined little over the past half century and suggest that such rudimentary forms of play should not be overlooked.



Tezuka Architects, Fuji Kindergarten, Japan

Thank you for this opportunity to comment on the WCC's Draft Play Spaces Policy. If you have any questions please do not hesitate to contact me.

Yours faithfully

  
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