



Building a healthy  
Australia through play

## National Urban Policy Response to draft

*Play Australia welcomes the development of a National Urban Policy for Australia.*

*However, we are aware of critical omissions in the draft that contradict current national strategies, protocols and not consistent with international best practice.*

*In this submission we aim to identify those gaps and seek your support to have them addressed before the National Urban Policy is finalised.*

**About Our Organisation:** Play Australia [www.playaustralia.org.au](http://www.playaustralia.org.au)

### Organisation Profile:

Play Australia is the peak national advocacy organisation for PLAY in Australia, established 110 years ago in 1913.

Our mission is to build a healthy Australia through play.

We support the protection, promotion, and provision of play in Australia by way of advice, training, access to information and professional services.

We have a diverse support base via our membership, and we are the only cross sectoral membership organisation in Australia dedicated to play. Our membership is drawn from Local Government, Education and Care, Landscape designers and architects, urban planners, risk assessors and parents,

As the Australian branch of the International Play Association (IPA) we protect the human rights of all children to play, as recognised within Article 31 of the United Nations Convention on the Rights of the Child.

Play Australia (IPA Australia) is an incorporated not for profit organisation and is under the provisions of the Associations Incorporations Act 1981 Victoria.

Play Australia (IPA Australia) is registered as a charity with the **Australian Charities and Not-for-profits Commission (ACNC)**, which oversees the national regulatory framework for the not-for-profit sector, the Australian Charities and Not-for-profits Commission Act 2012 (the ACNC Act 2012).



[www.playaustralia.org.au](http://www.playaustralia.org.au)

## Our Response

We wish to comment specifically on omissions within the content of the following

**Part 3: Australian Government Goals .**

**Part 4: Australian Government Objectives.**

These omissions relate to children's play and the voice of the child in planning.

Internationally, these two elements are seen as critical in the development of urban policy. If Australia was to release a policy without these two elements it would be detrimental to our international standing.

It is important to note that the Australia Government as a signatory to the United National Convention on the Rights of the Child (UNCRC), has an obligation to uphold and respect the Convention. In particular, the National Urban Policy should ensure Article 31, Articles 12 and Article 4, are referenced and strategies identified to reflect the application of these article in the Policy. If the Australian Government fails to do so they are in breach of the Convention.

### *Article 31*

*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.*

### *Article 12*

*States Parties shall assure to the child who can form his or her own views the right to express those views freely in all matters affecting the child, the views of the child being given due weight in accordance with the age and maturity of the child.*

### *Article 4*

*States Parties shall undertake all appropriate legislative, administrative, and other measures for the implementation of the rights recognized in the present Convention. Regarding economic, social and cultural rights, States Parties shall undertake such measures to the maximum extent of their available resources and, where needed, within the framework of international co-operation.*

In addition, in 2016 the Australian Government 2016, endorsed the New Urban Agenda highlighting that public spaces should meet the needs of the vulnerable, including children and young people, and calling for inclusion and equal use of our cities.

**We believe the omission of children's play and voice from the National Urban Policy would disenfranchise 5.1 million of the Australian population and their carers.**

### 3. Australian Government Goals

To meet the **Liveable and Equitable** parameters outlined in the policy document, play and the associated rights of the child must be included.

Currently the document has no reference to play.

There may be some confusion by the authors that the term ‘recreation’ applies to play. However, this would be incorrect. Play and recreation are defined differently.

Play is intrinsically motivated, may have no perceived outcome and is fun and spontaneous, Recreation has more structure and intent (Coleman and Kohn 2013).

Play is a biological necessity, and research has identified it as critical to human development. It sits alongside adequate sleep, good nutrition and quality caregiving in that impact it has on a child’s development and long term health outcomes,

**We recommend inclusion of Play in the factors identified for Liveable and Equitable. It should sit within the text, wherever ‘recreation’ is referred to in the Government Goals.**

Access to Play is a key factor in determining a city’s liveability and quality of life, for both children and their caregivers.

The increasing urbanisation of Australia has resulted in a decrease in both places for children to play and accessible routes to play.

*We recommend inclusion in factors that determine a city’s liveability and quality of life of:*

- *Access to PLAY spaces and opportunities for children to engage in play throughout their community, through accessible walking routes that allow for incidental play to occur.*
- *Engagement with children in the planning and design of their cities*

Factors that determine a city’s **equity** should include children and carers access to accessible play spaces. We are aware through research undertaken during COVID, children in high rise or with no backyards were substantially more affected by lockdowns than children in areas where there was more green space and access to play.

A report<sup>1</sup>, released this year, which drew on work undertaken to write the principles and guidance of public spaces for children, identified eight case studies that directly or indirectly address children’s physical and mental health as a rationale for urban transformations and

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<sup>1</sup> Chatterjee, S., & Dutta, C. (2024). Healthy public spaces for children within neighbourhoods through urban transformations. *Cities & Health*, 1–16.  
<https://doi.org/10.1080/23748834.2024.2375857>

the development of public spaces using evidence-based health-promoting strategies. Its findings demonstrate it is possible to develop safe and vibrant public spaces within neighbourhoods through equity-focused planning to reduce health disparities for children and adolescents.

**We recommend inclusion of Play in the factors identified for Equitable:**  
*Access to play spaces through planned provision of accessible play spaces and staffed adventure playgrounds.*

#### **Part 4; Australian Government Objectives.**

Play Australia supports the six objectives identified for the national Urban Plan with the following comments and inclusions on 4 of the 6 objectives, to address the identified gaps of play and children's voice:

We offer the following commentary and suggestions for inclusion:

##### **Objective 1: No-one and Place left behind**

The explanation of this objective should include reference to play spaces.

Access to safe places to play promotes not just healthy child development but promotes social cohesion and reduces loneliness. It is an essential service and should be referred to in the objectives, as it is fundamental for human development,

Schools do not only provide education, but time for children to engage in play. Play supports and enhances learning and prepares the brain for new information. Reference to schools in new urban developments should also include provision for schools to have adequate outdoor play spaces for the school population.

It should be noted that Children often claim a diverse range of public spaces for play across a range of geographies, cultures and backgrounds. Most of these public spaces are not categorised as traditional playgrounds but occur only as liminal spaces within the built and natural environments of cities, they may be streets, footpaths, bus stops, art installations, quirks in a geography or landscape. Providing access to liminal spaces allows children to claim their 'right to the city', and particularly for disadvantaged children, which supports and protects play territories in liminal spaces fulfills many of their rights. To foster cities that are respectful of children's rights, we need to protect, preserve and enhance liminal spaces as children's places (Chatterjee, 2023).

Play Australia, partnering with Local Government, has supported the development of over 350 play streets through our 1000 Play Streets model. We also see through use of art in communal spaces, play being encouraged, such as the Adelaide City Council playscapes in Rundle Mall during.

It is acknowledged that well-designed built environments contribute to our health and wellbeing. In a Play Australia Advisory note “ Planning and Design for Play in the built environment”.<sup>2</sup> we ask planners and designers to adopt a principles-based approach to guide the design of developments of all scales. These principles place emphasis on supporting community engagement in the design and development process; creating places that are inclusive, where we feel a sense of belonging, that are engaging, where we can thrive and where our wellbeing is supported. We attach this document to our submission for your reference.

#### ***Additional Key urban challenges for inclusion***

- Loss of public play spaces
- Reduction in outdoor play space in new and existing schools.
- Lack of safe play corridors for children to gain independence by walking to school and activities.

#### ***Additional Actions for inclusion***

- Investment in public play spaces and staffed adventure playgrounds.
- Support development of new initiatives to support community access to play
- Undertake an analysis of inter- and intra-urban disparities to capture child well-being across various sectors and spatial locations using geographically disaggregated data.
- Include in planning considerations how liminal spaces may be a catalyst for play.
- Requirements to safeguard outdoor play space in schools.

#### **Objective 2: All people belong and are welcome**

This objective should include reference to equitable access to play spaces.

In noting the discussion on this objective regarding Australian Government commitments, we note that this commitment should also include their commitment to the UNCRC referenced earlier.

Independent Play is the building block for successful engagement in community, teaching children to navigate complex social interactions, experience negotiation and problem solving and the building block for successful participation in sport.

The discussion and key urban challenges fail to address this important starting point for achievement of the goals set, and initiatives must be undertaken to support, promote and develop an infrastructure for play that is bilaterally supported.

Internationally, play has been identified as significant enough to warrant national play agendas and play sufficiency measures, Significant investment has been undertaken by countries in play infrastructure including New Zealand, Wales, Canada, Scotland, Ireland and

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<sup>2</sup> <https://www.playaustralia.org.au/resource/planning-and-design-play-built-environment-advisory-note>

England. One of these initiatives includes Play Sufficiency measures for local in Wales<sup>3</sup> and now Scotland.

#### ***Additional Key urban challenges for inclusion***

- Lack of Investment in infrastructure for play

#### ***Additional Actions for inclusion***

- Ensure guidelines for urban planning include a requirement to engage with a wide range of stakeholders to promote child-responsive urban planning and children’s participation in developing public spaces and community public facilities.
- Explore feasibility of Play Sufficiency measures for local government

#### **Objective 3: Our urban areas are safe**

A key element of addressing crime risks and engaging with marginalised groups is to ensure a dialogue is maintained and people feel a sense of ownership about the spaces they use. Consultation and dialogue are not referred to in this summary paragraph.

In additional children’s independent mobility impacts their development and opportunities for play. Reference to public spaces should always include play spaces as they are pivotal to many children and families and their access and engagement in community. Safe places to play are integral to a child’s sense of safety and wellbeing.

#### **Additional Key urban challenges for inclusion;**

- Access to safe places to play
- Opportunities for children to practice independent mobility, reliance on car for transport to school and play.

#### ***Additional Actions for inclusion***

- Incorporate the views of children and young people in what makes a place safe and initiatives that would support this.

#### **Objective 5: Our urban environments and communities promote health and wellbeing’**

This paragraph does not identify equitable access to play spaces and should be included.

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<sup>3</sup> <https://play.wales/play-policy-legislation/play-sufficiency/#:~:text=Every%20local%20authority%20in%20Wales%20has%20to%20complete%20a%20Play,year%2C%20along%20with%20progress%20reports.>

However, the possible actions do lend themselves to recognition of play initiatives that increase health and wellbeing so it would make sense to included play in explanation of the objective.

As an example, the 1000 *Play Streets* project was identified as supporting the development of physical literacy in children as well as developing psychological and social capabilities in children. <sup>4</sup> The 1000 Play Street project also undertook an analysis of adult participation in Play Streets and saw improvement in mental health and social cohesion.

### ***Additional Actions for inclusion***

- Use data on children’s vulnerability to better target different policies, programmes, infrastructure in urban planning.
- Collaborate with state, territory and local governments to;
  - Support the development of polices for development of public space for play
  - Measures that support initiatives for children’s independent mobility including play corridors around schools and play spaces,

### **Conclusion**

Play Australia supports the development of the Urban Planning Policy, and we will remain committed to consultation and engagement with Government to ensure that the policy is fit for purpose, We believe play and the voice of children are important elements for inclusion in any Urban Planning Policy and is consistent with International best practice.

### **Contact Information**

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<sup>4</sup> [https://www.playaustralia.org.au/sites/default/files/CSSI\\_PlayStreets-and-PL-Literacy-Framework\\_Report\\_June\\_2020.pdf](https://www.playaustralia.org.au/sites/default/files/CSSI_PlayStreets-and-PL-Literacy-Framework_Report_June_2020.pdf)