

# STATES OF JERSEY



## ISLAND PLAN 2022-25: APPROVAL (P.36/2021) – AMENDMENT PLAY AREA PROXIMITY

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Lodged au Greffe on 6th July 2021  
by Deputy I. Gardiner of St. Helier

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STATES GREFFE

**PAGE 2 –**

After the words “the draft Island Plan 2022-25” insert the words “except that –

- (a) within Policy CI 8, the words “within 10 minutes walking distance, or 1,000m from the site”, should be replaced with “within 5 minutes walking distance, or 500m from the site” each time that they appear;
- (b) within Policy CI 8, after paragraph 3, insert the words “If any such agreed, off-site contribution cannot be met within the specified distance, new play space must be provided elsewhere and evidence of options considered must be provided, together with a justification for the proposed location and an explanation as to how this will benefit the occupants of the development.”;
- (c) before Policy CI 8, insert the following new Proposal; “The Minister for the Environment will work with the Minister for Economic Development, Tourism, Sport and Culture, and the Minister for Children and Education , to develop a play strategy for the Island, with a specific focus on play area provision in St. Helier”; and
- (d) before Policy CI 8, insert the following new Proposal; “The Minister for the Environment will develop and publish supplementary planning guidance for developers in relation to the provision of play space”.

DEPUTY I. GARDINER OF ST. HELIER

**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) within Policy CI 8, the words “within 10 minutes walking distance, or 1,000m from the site”, should be replaced with “within 5 minutes walking distance, or 500m from the site” each time that they appear;**
- (b) within Policy CI 8, after paragraph 3, insert the words “If any such agreed, off-site contribution cannot be met within the specified distance, new play space must be provided elsewhere and evidence of options considered must be provided, together with a justification for the proposed location and an explanation as to how this will benefit the occupants of the development.”;**

- (c) before Policy CI 8, insert the following new Proposal; “The Minister for the Environment will work with the Minister for Economic Development, Tourism, Sport and Culture, and the Minister for Children and Education , to develop a play strategy for the Island, with a specific focus on play area provision in St. Helier”; and
- (d) before Policy CI 8, insert the following new Proposal; “The Minister for the Environment will develop and publish supplementary planning guidance for developers in relation to the provision of play space”.

## REPORT

*The importance of play and recreation in the life of every child has long been acknowledged by the international community, as evidenced by the proclamation in the 1959 Declaration of the Rights of the Child: “The child shall have full opportunity for play and recreation [...]; society and the public authorities shall endeavour to promote the enjoyment of this right” (art. 7). This proclamation was further strengthened in the Convention on the Rights of the Child (the Convention) of 1989 which explicitly states in article 31 that “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.”*

### [Committee on the Rights of the Child](#)

*Play is a critical and intrinsic part of healthy human life and development and a child’s ability to exercise the right to play should not be dependent on the environmental conditions where that child lives or the family they were born into.*

### [Children’s Right to Play and the Environment](#)

Adequate play space is not just something it would be good to have, not something that can be an afterthought. It is a right of children and it is something they need in order to grow into healthy rounded adults. Developmental benefits of playgrounds include the following: coordination and motor skills, cognitive skills, social acumen, language, and more. Doctors, scientists, and educators have all conducted research that proves this critical fact: without being able to play, children may develop the skills mentioned above at a severely stunted rate. Just like eating and sleeping each day, play is vital for a child to develop the necessary skills at a healthy pace

The focus of new housing inevitably lands in St. Helier and adjacent areas. The very areas that are lacking in play space. Play space in St. Helier was, in 2018, recorded at 39% of the requirement, based on benchmarks.

Summary of performance against St Helier benchmark standards (recorded 2018)				
Typology	benchmark standard (Ha/1,000 population)	Total space “expectation”	Actual availability of space	Status against benchmark at the time of audit (2018)
Parks	0.5	17.5ha	17.6ha	100%
Play space	0.1	3.5ha	1.38ha	39%
Outdoor sports facility	0.8	28ha	27ha	96%
Amenity greenspace	0.25	8.75ha	6.93ha	79%
Natural greenspace	1.0	35ha	24.62ha	70%

Table CI2: Town performance against benchmark standards (as at 2018)

The bridging island plan does acknowledge this – and set out proposed extensions to Millennium Town Park, development of Warwick Farm and creation of access to Grands Vaux Reservoir. But this does not fully incorporate the proximity calculations which are also detailed within the draft plan:

Adopted benchmark standards for open space in Town		
Typology	Quantity standard	
	Ha/1,000 popn (Vergee/1,000 popn)	Access standard (metres)
Parks	0.5 (2.8)	500
Play space	0.1 (0.55)	500
Outdoor sports facility	0.8 (4.44)	3,000
Amenity greenspace	0.25 (1.40)	500
Natural greenspace	1.0 (5.50)	500

Table C12::Town open space benchmark

The access to play space benchmark standard is that play space should be available within 500m. However, within Policy CI 8 this has been proposed as 1,000m. No reason for this discrepancy is included in the plan.

This amendment re-aligns Policy CI 8 with the benchmark standards, whilst also accepting, in clause c) that there may be instances where developers can prove that better, new facilities can be provided within 1,000m – which would be reviewed to assure they were of greater value than the potential enhancement of closer play facilities.

This amendment then takes the bridging island plan one step further, inserting new proposals that request Ministers to develop and bring forward a specific play strategy for the island, to ensure that children receive the best possible start in life, and further requesting the Minister for Environment to provide supplementary planning guidance in relation to play space, which will help developers to have a clear definition of what play space constitutes “enhanced” play space, and provide specifications for the new builds

The [draft bridging island plan 2022-2025](#) acknowledges the historic lack of focus on the play needs of children – this amendment merely seeks to take this a step further and to really put children first.

### **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 of 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 – and that children in St. Helier should have no less right to access to play space than children in rural parishes.