

PLAYFUL COMMUNITIES
UNIVERSALLY CO-DESIGNED PLAYFUL SPACES:
REIMAGINING PUBLIC SPACES WITH
CHILDREN AND COMMUNITIES

CONSULTATION RESPONSE TO NPPF

**Co-produced by University of Gloucestershire and
University of Worcester, Play Worcester CIO**

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Glossary of Terms

A–H

Active Travel for Children (ATC)

Walking, cycling, scooting and other forms of non-motorised movement.

In PLAYFUL COMMUNITIES, active travel routes double as **safe, playful corridors** that support children's independent mobility.

Aligned with sustainable transport goals (Chapter 15).

Amenity Space (AS)

Outdoor space that contributes to residents' quality of life.

Reframed through PLAYFUL COMMUNITIES as **multifunctional, playable environments** rather than passive landscaping.

Biodiversity Net Gain (BNG)

A requirement for development to leave nature in a measurably better state.

Playful communities use BNG to create **wild play zones, sensory landscapes and child-nature encounters**.

Child Impact Assessment (CIA)

A structured assessment of how policies or developments affect children.

Not currently mandated in the NPPF, but a key reform opportunity to embed **child-centred decision-making**.

Climate Resilience (CR)

The ability of places to withstand climate impacts.

Playful communities integrate **nature-based play**, shade, water and adaptable landscapes that teach children about resilience.

Child-Friendly Planning (CFP)

Designing spaces, routes and policies around children's independent mobility, safety and social interaction.

Co-Design (CD)

A collaborative design process where communities—including children—shape public spaces to reflect collective needs and aspirations.

D–H

Design Codes (DC)

Local rules guiding the form and appearance of development.

A major lever for embedding child-friendly and playful design standards (e.g., visibility, gradients, materials, micro-play).

Development Management (DM)

The process of assessing planning applications.

Reframed through PLAYFUL COMMUNITIES as a process that considers children's freedoms, safety and access to play as material factors.

Green Belt (GB)

Land is protected to prevent urban sprawl.

A resource for natural play, exploration and child-nature connection, not just visual openness.

Green Infrastructure (GI)

Networks of natural and semi-natural spaces.

In playful communities, GI becomes play infrastructure—woodlands, meadows, SuDS and parks designed for children's curiosity.

Grey Belt (GB)

A clarified category for land that can support growth more flexibly while still acknowledging constraints.

Healthy Communities (HC)

Places that support physical, mental and social well-being.

Play is recognised as a health determinant, essential for movement, belonging and emotional development.



Independent Mobility (IM)

Children's ability to move around their neighbourhoods without adult supervision.

A core principle of PLAYFUL COMMUNITIES, supported by **safe streets, crossings, low-traffic areas and playful routes**.

Local Plan (LP)

A statutory document setting out local planning policies.

A key site for embedding **child-inclusive engagement** and mapping play needs across neighbourhoods.

Mixed-Use Development

Areas combining homes, shops, services and public spaces.

Playful communities use mixed-use layouts to create **lively, intergenerational environments** where play is part of everyday life.

Nature-Based Play (NBP)

Play that uses natural materials, landscapes and ecological features.

Central to biodiversity objective, climate-aligned, sensory-rich PLAYFUL COMMUNITIES in the draft NPPF (Chapters 5 & 19)

National Decision-Making Policies (NDMP-style policies)

Non-statutory national policies that apply directly to development decisions and must not be duplicated in Local Plans

National Planning Policy Framework (NPPF)

The national policy document guiding plan-making and decision-making in England. The December 2025 draft restructures the framework and introduces major policy reforms.

Plan-Making Policies (PMPs)

Policies that guide the preparation of Local Plans and spatial development strategies. Now formally separated from decision-making policies in the 2025 draft.

Play Infrastructure (PI)

Spaces, routes and features that support play.

A proposed NPPF reform: recognising play infrastructure alongside transport, schools and utilities.

Participatory Planning (PP)

Planning processes involving communities in shaping decisions.

Extended to include children and young people as co-designers, not passive consultees.

Playful Communities (PC)

A concept describing universally co-designed neighbourhoods in which play is integrated into streets, nature, heritage, mobility routes, and civic spaces. (Interpretive planning term).

Play-Responsive Design (PRD)

Design that embeds opportunities for unstructured, social, nature-rich or movement-based play into everyday public spaces.

Playable Public Realm (PPR)

Streets, squares, paths, and parks are intentionally designed to encourage playful interaction across all ages and civic spaces accessible to all.

In PLAYFUL COMMUNITIES, the public realm becomes playable, inclusive and socially connective.

Presumption in Favour of Suitably Located Development (PFSLD)

A strengthened, rules-based presumption supporting development in appropriate locations—replacing a conditional “tilted balance.”

Q–Z

Resilient Play Spaces (RPS)

Play areas are designed to adapt to climate risks such as heat or flooding.

A key opportunity in Chapters 5 and 18 of the NPPF.

Social Infrastructure (SI)

Facilities that support community life (schools, libraries, health centres).

Playful communities expand this to include spaces for intergenerational interaction and informal play.

Sustainable Transport (ST)

Transport that reduces emissions and supports active travel.

Reframed as enabling children’s freedom to roam, not just modal shift.

Tactical Urbanism (TU)

Low-cost, temporary interventions to test ideas.

Used to pilot play streets, pop-up parks and child-led design experiments.

Universal Design (UD)

Design that works for all ages and abilities.

In PLAYFUL COMMUNITIES, universal design includes affordances for play, sensory diversity and child-scale environments.

INTRODUCTION

Why make a response to the NPPF consultation?

While the NPPF 2025 provides a comprehensive framework for planning policy in England, evidence of children and youth-based outcomes is lacking.

Although the NPPF sits alongside primary equality legislation such as the Equality Act 2010, it falls short in recognising the importance of children to the planning process in five key areas.

These key areas are:

- Lack of any specific reference to the inclusion of children in the planning process, especially from an early age. The NPPF has not made a step change (as other societies, such as Finland, have) towards the proactive involvement of children in the policy-making and development process.

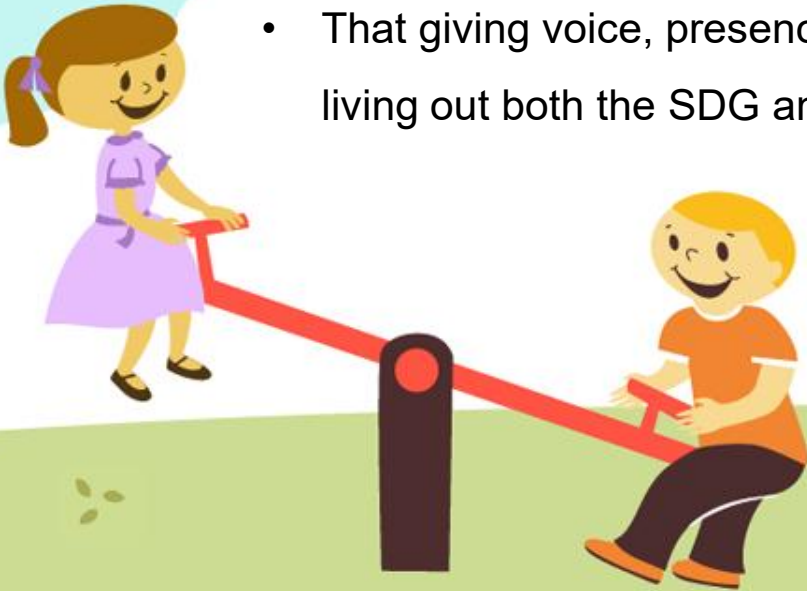
INTRODUCTION

- Defining youth and children's interest mainly in the form of play provision and community facilities rather than the wider scope of informal play and child-friendly design – including the provision of 'meantime' or 'oasis' spaces for communities to use as development is happening around them.
- Developing the wider concept of playability of towns, cities, villages and neighbourhoods as a civic value – enhancing places and sense of belonging and connectivity for people of all ages.
- Lack of children's voice and ways to positively stimulate involvement of children of all ages, not only relating to co-design of spaces catering especially for children, but making development generally child-friendly as a natural matter of course. Linked to this the provisions of the Equality Act 2010 (and especially the protected characteristic of age) needs to be built on in the NPPF, enabling advocacy and the proactive engagement of children in the planning process.
- Lack of recognition of the pivotal requirements of the UN Convention on Rights of the Child and the UN Sustainable Development Goals.

We delve into these issues in more detail as we go through the document

SDGS AND UN CONVENTION RIGHTS OF THE CHILD

- Both the UN Sustainable Development Goals (2012) and the UN Convention on Rights of the Child (1992) are overarching, global principles that need to be captured in the NPPF.
- We expand on this point specifically in the next 2 pages but this also underpin the approach we have taken in our overall response i.e:
 - To ensure that we do leave our planet and environment in a better condition for future generations.
 - That we listen to the ‘future generation’ now as they are very much present.
 - That giving voice, presence and agency to be heard in the planning process is one way of explicitly living out both the SDG and UNCRC principles.



PIVOTAL GLOBAL PRINCIPLES: UN SGSs

- All of the 17 SDGs impact on children, their environment wellbeing and context in some way
- Developing a proactive town planning policy framework that enables children's voice in forward planning policy and site specific decisions demonstrates strong commitment to SGS 3, 10 and 11.
- The ability for children to access play but also live in playful spaces aligns fully with the SDG objectives.
- **We must not forget that to create healthy and sustainable communities it is essential that adults also have the ability to be playful, imaginative and visionary about their local communities.**

Living out global responsibility locally

<https://sdgs.un.org/goals>

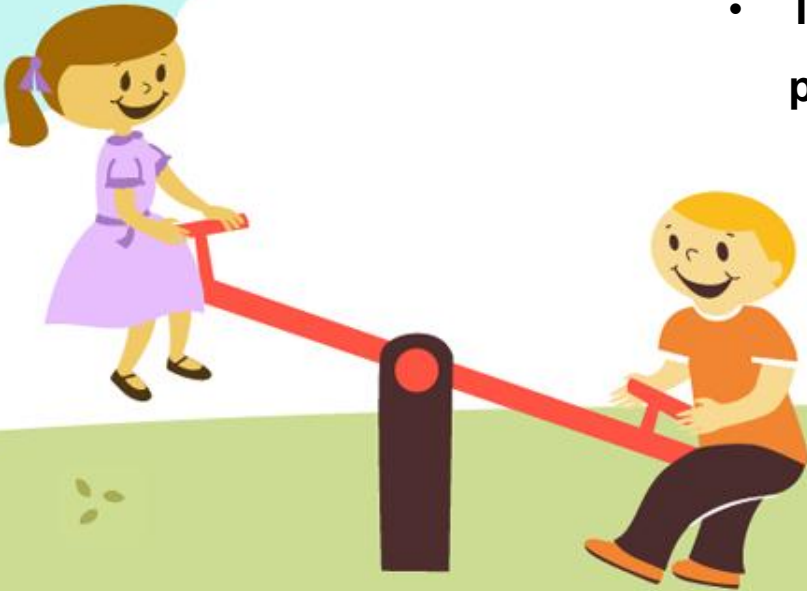


PIVOTAL GLOBAL PRINCIPLES: UN CRC

- The Convention has 54 articles that cover all aspects of a child's life and set out their civil, political, economic, social and cultural rights.
- The convention is universal—these rights apply to every child and the convention entitles every child to claim them.
- Whilst the rights are of equal importance to every child, two of the articles are important in terms of planning and the NPPF.
- These cover:
 - The right to Relax and play (Article 31)
 - The right to Freedom of expression (Article 13)
- **There is a key opportunity provided to advance children's voice and the creation of more accessible and playful communities through further amendments to the NPPF – which we outline in detail later**

AIMS OF OUR RESPONSE

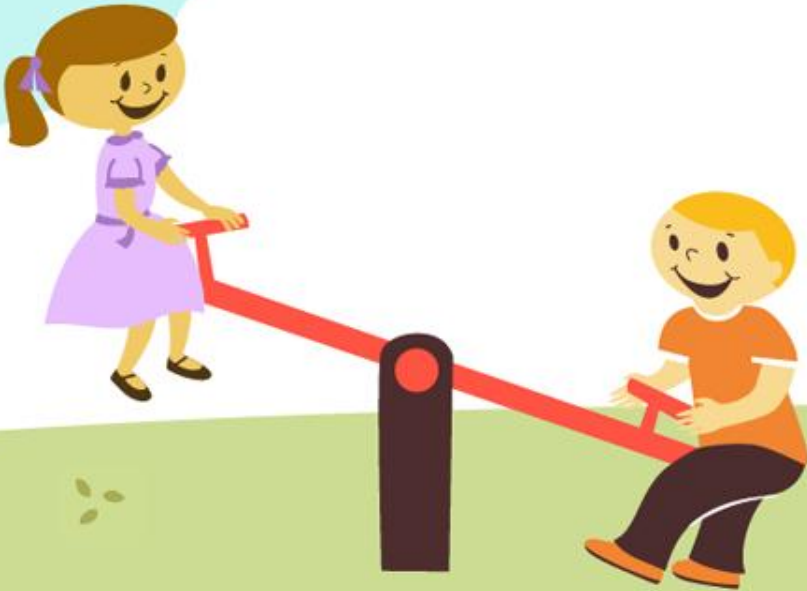
- To embed play as a societal structure and necessity through the planning process....through the adoption of Universal Design principles
- To make play visible and child's voices heard at all stages of the planning process – from policy to concept to accessible design to build to use...
- To make play actionable and accountable within the national planning framework – at policy and development site levels



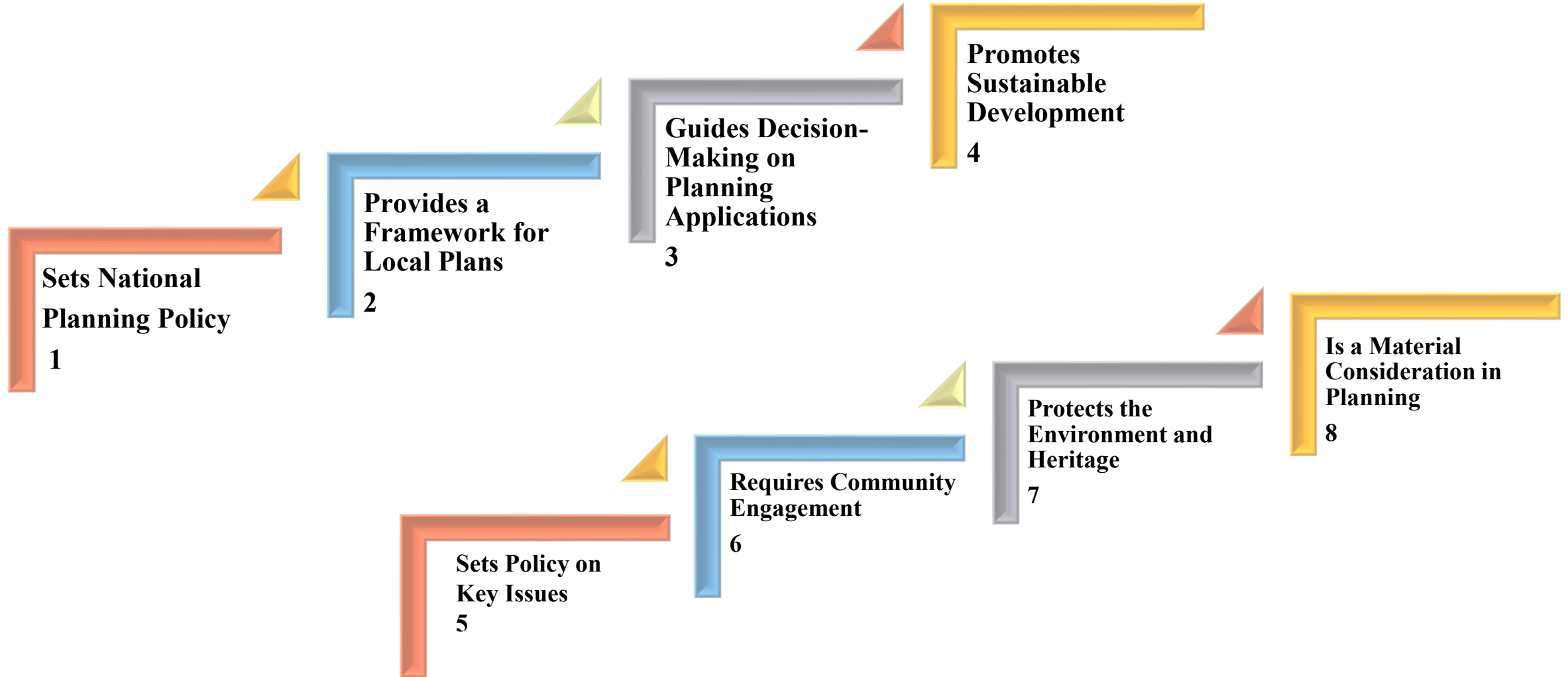
DEFINING THE NPPF

The National Planning Policy Framework (NPPF) is the central document that sets out the planning policies for England and explains how they must be applied by local planning authorities, inspectors, and developers. It does not replace local plans, but it guides and constrains them.

It also help **planners make decision about larger (major) planning applications** and provides a set of baseline principles and policies that should be adhered to – especially if there is no local plan in place or is ‘out of date’



WHAT DOES THE NPPF DO?



📍 Exploring The National Planning Policy Framework Revised Chapters (2025)

Ch2 · Plan-making policies 📄

Ch3 · Decision-making policies ⚖️

Ch4 · Achieving Sustainable Development 🌍

Ch5 · Meeting the challenge of climate change 🌞🔥

Ch6 · Delivering a sufficient supply of homes 🏠

Ch7 · Building a strong, effective economy 🏭

Ch8 · Ensuring the vitality of town centres 🛍️

Ch9 · Supporting high-quality communication 📡

Ch10 · Securing clean energy and water 💧⚡

Ch11 · Facilitating the sustainable use of minerals ⚒️

Ch12 · Making effective use of land 📐

Ch13 · Protecting green belt land 🌳

Ch14 · Achieving well-designed places 🏡

Ch15 · Promoting sustainable transport 🚲

Ch16 · Promoting healthy communities ❤️

Ch17 · Pollution, public protection and security 🛡️

Ch18 · Managing flood risk and coastal change 🌊

Ch19 · Conserving and enhancing the natural environment 🌿

Ch20 · Conserving and enhancing the historic(al) environment 🏰



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WHY PLAY MATTERS

- If **play, co-design, and child-friendly environments** are not clearly set out in the NPPF, they become **harder to justify** in **local plans** and in **development decisions**.
- The NPPF's **rules-based structure** (especially in the December 2025 draft) means that what is **omitted is effectively excluded** from **mainstream planning practice**.
- Arguably, **reimagining public spaces with children and communities** requires **national policy recognition**—and the NPPF is the place to start.

Core Elements of the NPPF

Element	Function in the Planning System
National Policy Authority	Provides a unified framework for planning decisions across England.
Presumption in Favour of Sustainable Development	Planning should promote economic, social, and environmental sustainability.
Decision-Making Standards	Provides grounds for approving or refusing planning applications, including appeals.
Plan-Making Framework	Influence how Local Plans are formulated, including housing targets, land use, and infrastructure.
Certainty and Consistency	Offers a rules-based structure to reduce ambiguity and improve delivery across local authorities.
Monitoring and Delivery Focus	Encourages measurable outcomes, housing delivery tests, and plan reviews.
Policy Integration	Merges (binding glue) together housing, transport, environment, design, heritage, and economic development.
Material Consideration	A legal document recognised in planning decisions often dominates local policies.

The NPPF's “Presumption in Favour of Sustainable Development”

This statement represents the most robust expression of the National Planning Policy Framework (NPPF) as a national policy authority, indicating that all local plans and decisions **must conform to its directives**.

What It Means

- It **binds every local planning authority** to apply national policy when preparing Local Plans and when deciding planning applications.
- **Planning permission should be granted** unless a proposal clearly conflicts with the NPPF.
- Ensures that **local plans cannot contradict national policy**—they must be “consistent with the NPPF”.

Why Play is a Perfect Example

Because it shows how the NPPF overrides local discretion – which is exactly where the child's world starts

- Local Plan policy conflicts with the NPPF → the NPPF wins
- Planning application aligns with the NPPF → it should normally be approved.
- If a local authority wants to refuse something, it must show a clear conflict with national policy.

- **A key reminder is that under the UNCRC – children have right to be consulted and engage in the planning process.**

Considering the impact of the SDGs

The UN SDGs are helpful in defining what sustainable development actually is. With the proposed changes in wording to the NPPF - and in particular relating the presumption in favour of sustainable development – a clear definition of what sustainable development is will be critically important.

Making a clear link, at policy level, to the SDGs and ensuring that the key themes and paragraphs are expressly linked to the SDGs would make the NPPF more transparent.

Clear evidence from experts in play and place (Tim Gill, Alison Stenning and Wendy Russell) show the critical link between quality of place, livability and the voice of children in shaping their environment.

In additional recent research (Gloucestershire Community Rail Partnership) into child and youth inclusion shows that our current generation are significantly motivated by environmental responsibility and sustainability issues – with a deep care and sense of stewardship.

It is vital that the planning system captures the thinking and motivation of these agents of change – and lays down clear processes for actively hearing these voices.

The consequences of not being ‘play friendly’ in the NPPF

If children’s play, co-design, or the need for wider child-friendly environments are not written into the NPPF....then:

Planning decisions cannot give them weight

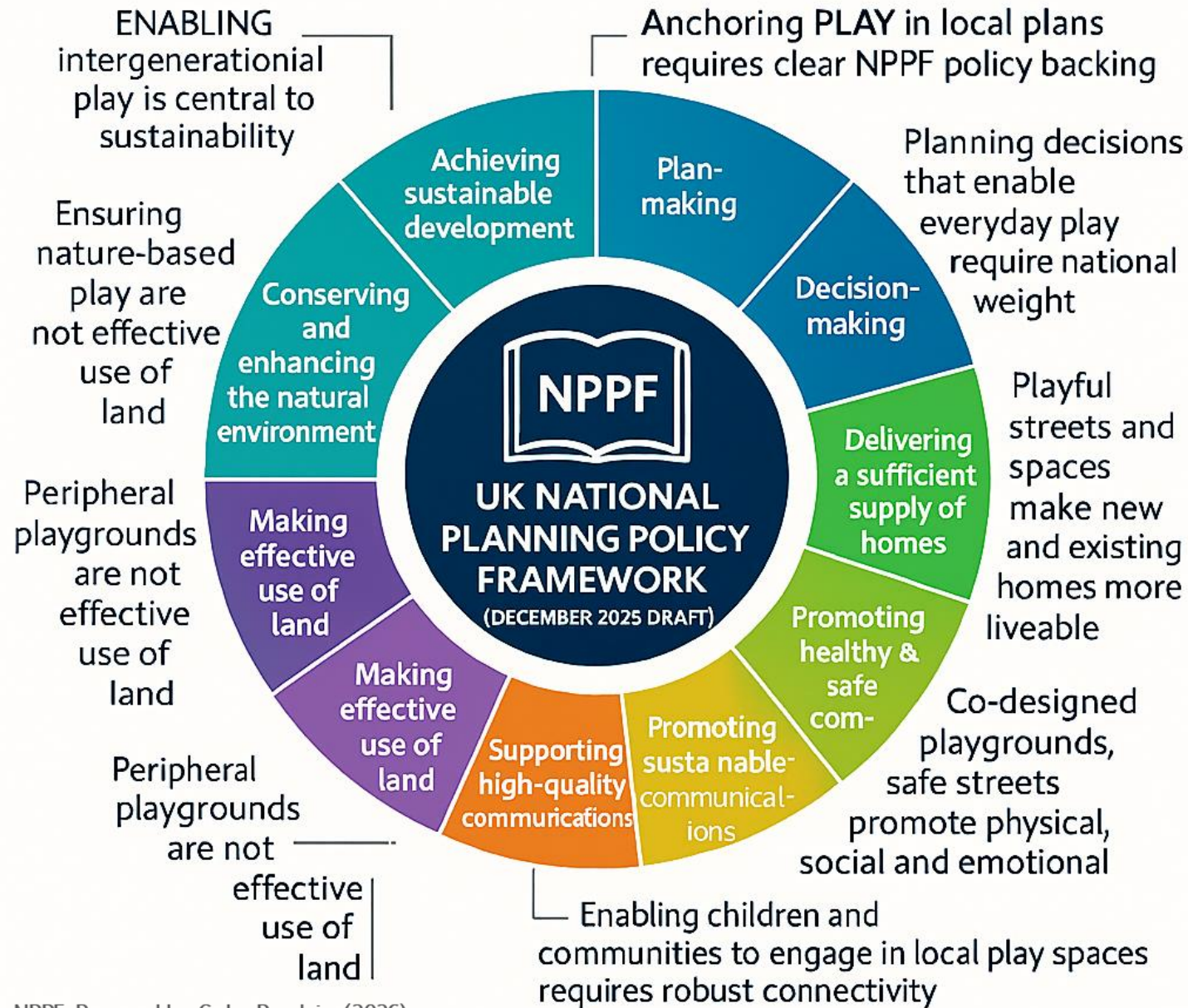
Inspectors cannot defend them at appeal

Developers cannot be compelled to provide them

- Linked to this, ensuring that there is proactive training and development of planning professional to be able to understand play and wider children's voice – is critical.
- People don’t know what they don’t know – so whilst there are pockets of progressive and fresh thinking in this area – core experience of child-centred engagement (as opposed to ‘consultation’) is not ubiquitous.
- There’s a need to consider developing a further NPPG covering Children's Voice and Playful Communities – and also embedding these messages within existing NPPGs.

Play must be recognised as integral social infrastructure as well as physical infrastructure at all layers of the planning process

UK NPPF AND PLAYFUL COMMUNITIES



National Planning Policy Framework Chapters

NPPF Chapters and potential links to creating Playful Communities



Implementation Levers: Stimulating PLAYFUL COMMUNITIES in the NPPF (2025)



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National model universal design code

Add a child-friendly / playful communities' section with a clear system of measurement and examples – based on sound principles of Universal Design and putting the Equality Act 2010 centre stage

Planning Practice Guidance (PPG)

Issue guidance on Child Impact Assessments, co-design methods, and play audits.

Monitoring and Reporting

Encourage authorities to report on access to play, independent mobility and child-friendly public realm as part of plan monitoring.

Additional Themes needed in the NPPF to support Playful Communities



Theme- Planning & Participation



Theme- Climate & Environment



Theme- Housing & Economy



Theme- Transport & Community



Key questions for planners:

- How can play and playfulness be reimaged in the NPPF with children at the heart of the process?
- How can children be given full freedom to including with the full backing of the UNCRC and SDGs?
- How can implementing this approach benefit everyone?
- How do we build in helpful child-centred frameworks into planning practice (e.g. Nicholson, Brann)?

Chapter 18 Managing Flood Risk and Coastal Change

Designing adaptable play spaces in flood-prone areas promotes resilience and environmental awareness



Chapter 19 Conserving and Enhancing the Natural Environment

Natural play spaces foster environmental stewardship and sensory learning for children



Chapter 12 Making Effective Use of Land

Maximising land use includes integrating multifunctional, playful public spaces into urban design.



Theme- Heritage



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FACTUAL GAPS IN THE NPPF

Achieving Sustainable Development

Gap in Chapter 2, paras 7 - 14

What the NPPF says

The NPPF outlines a clear aspect of sustainable development through economic, social, and environmental objectives.

What is the gap?

Disparities exist in recognising children's right to play and child development in public space design, which are vital for social sustainability. Co-designing with communities, including children, is essential for sustainable development.

Why does this matter?

Playful public spaces are foundational to social sustainability, yet the NPPF frames sustainability in adult-centric, economic-productivity terms.



Achieving
Sustainable
Development
GAP 2

Counterargument

1. *Prioritising children's right to play might conflict with other community needs in public space design, such as housing or transportation.*
2. *The focus on child development overlooks the needs and rights of other demographic groups in the community.*
3. *Integration of child-friendly spaces could lead to increased maintenance costs and resource allocation issues for local governments.*



Delivering a Sufficient Supply of Homes

Gap in Chapter 5, paras 60 – 73

What the NPPF says

Major priority focuses on **housing delivery**, **density**, and **land supply**.

What is the gap?

There is no specification on how **child-friendly neighbourhood design** is in housing allocations.

No reference to **play provision**, **doorstep play**, or **safe movement networks** for children.

No expectation that new housing integrates **co-designed public spaces**.

Why does this matter?

Play deprivation often occurs in new housing estates where play areas are an afterthought. The NPPF does not address this issue.



Counterargument

1. *Focusing on housing delivery and density may be more critical for overall community development than supporting child-friendly design.*
2. *Allocating resources for play provision could lead to increased costs, which may deter developers from creating new housing.*
3. *The existing frameworks for public space design are sufficient and do not require integration for it to be effective.*



Promoting Healthy and Safe Communities

Gap in Chapter 8, paras 92 – 106

What the NPPF says

This section of the NPPF generally encourages safe, inclusive places, and references “opportunities for social interaction” and “healthy lifestyles”.

What is the gap?

This chapter **should** strongly support the diversity of approaches to child-friendly co-design and enabling their voice, but it does not. Children are significantly affected by public space design, yet their voices regarding play, playable environments, and child development are often overlooked.

Despite the chapter's emphasis on community needs, there is a requirement for co-design, standards, or expectations for the quantity, quality, or accessibility of play spaces, while recognising children as stakeholders in the planning process.

Their right to be heard, in line with the UN Rights of the Child and the UK Equalities Act 2010, needs to allow freedom of expression so that physical, mental and social and emotional wellbeing interests can be truly reflected. The design of spaces with children, not ‘for’ children is paramount, especially in the absence of local plan policy where an planning application avoids responsibility in this area

Why does this matter?

This chapter could have been a strong policy hook for playful communities, but it uses vague language that planners may overlook. It also means that local plan policy may also be weak in this area



Promoting
Healthy and
Safe Communities

CAP 9

Counterargument

1. *Including children's voices in co-design could lead to impractical or unrealistic planning outcomes.*
2. *The emphasis on social interaction and healthy lifestyles may distract from the specific design elements that truly impact children's play experiences.*



Promoting Sustainable Transport

Gap in Chapter 9, paras 104 – 113

What the NPPF says

This section covers active travel, sustainable transport, and safe movement for children.

Factual Gaps

No recognition of independent movement for children (cycling, walking and active travel)

No requirement for child-friendly street design (e.g., traffic calming, playable streets).

No expectation that transport planning should support playable neighbourhoods.

Linkage to schools and education provision is missing

The explicit role of green infrastructure, green connectivity, 'natural' blue and green routes to school and School Travel Plans in proudly 'playable opportunities' and wider wellbeing is overlooked

Why does this matter?

Children's ability to move independently is essential for playful communities, yet the NPPF emphasises mobility primarily in terms of adult commuting and travel behaviour



Promoting
Sustainable
Transport

CAR 12

Counterargument

1. *Adult commuting needs in transport planning are necessary for economic productivity and community growth.*
2. *Not all children may want or be able to engage in independent movement due to safety concerns.*
3. *Lead to increased costs and resources.*



Achieving Well-Designed Places

Gaps in Chapter 12, paras 126 – 136

What the NPPF says

The NPPF cares about high-quality, beautiful, inclusive design.

What is the gap?

No explicit reference to **play**, playful landscapes, or child-centred design

No obligation to any **co-design** or participatory design processes.

No guidance on designing **intergenerational public spaces**.

No play value, sensory engagement, or developmental needs is underrated.

Why does this matter?

This chapter represents the strongest design policy in the NPPF, yet it remains focused on adults and aesthetics rather than on experience or development.



Achieving
Well-Designed
Places

CAP 12

Counterargument

1. *High-quality aesthetics in design can lead to better long-term community investment and property standards.*
2. *Adult-focused spaces address most public needs effectively.*
3. *The play and sensory engagement might not be universally valued.*



Conserving and Enhancing the Natural Environment

Gaps in Chapter 15, paras 174 – 188

What the NPPF says

The attention is on biodiversity, landscape, and green infrastructure.

What is the gap?

There is no acknowledgement that natural play, informal play, or contact with nature for children are important priorities in planning.

No requirement for child-friendly green infrastructure.

There is no expectation that green spaces will be co-designed in partnership with local communities.

There is no consideration to the responsibility of developers to provide green space (even as meantime or oasis space) as interim spaces during long-term construction of schemes

Why does this matter?

Nature-based play is essential for playful communities, yet the NPPF sees green infrastructure primarily as ecological rather than social infrastructure.



Conserving
and Enhancing
the Natural

Counterargument

1. *Ecological considerations in green infrastructure should take precedence over social aspects, as they are vital for environmental health.*



Conserving and Enhancing the Historic Environment

Gaps in Chapter 16, paras 189 – 208

What the NPPF says

Heritage protection, significance, and harm tests.

What the gap is?

Heritage spaces are often not recognised as places that children and young people use.

There is a lack of guidance on how to offer playful interpretations of heritage and create child-friendly spaces in historic settings.

There is no recognition of how the above can support the wellbeing of both children and adults, and also support in memory recall such as supporting those living with dementia

Why does this matter?

Exciting activities in heritage-sensitive town centres often occur where vibrant playfulness intersects with historical architecture. However, the National Planning Policy Framework (NPPF) does not provide a comprehensive system to balance the enjoyment of play with the need for conservation, resulting in a gap in the management of these culturally significant areas.

Counterargument

1. *Conservation may sometimes outweigh the need for playful interactions in heritage spaces.*
2. *Some historical contexts may not be appropriate for playful reinterpretations, potentially undermining their educational value.*
3. *Existing heritage guidelines are adequate and do not require additional frameworks for child-friendly engagement.*



Potential Chapter-Specific Opportunities

Planning & Participation (Chapters 2–3)

Chapter 2 Plan-Making Policies

There should be an additional requirement that local plans **evidence engagement with children and young people**, including in site allocations and policies for open space, streets and centres.

Encourage local authorities to adopt **child-friendly or playful city strategies** as part of their evidence-based planning.

Chapter 3 Decision-Making Policies

Require decision-makers to consider **children's independent mobility, access to play, and safety** as material considerations.

A consideration of the use of **design review panels, including young people**, for major public realm and regeneration schemes.



Potential Chapter-Specific Opportunities

Sustainable Development, Climate and Environment

Chapters: 4–5, 10–11, 13, 18–19

Chapter 4: Achieving Sustainable Development

Explicitly include play, social connection and children's everyday freedoms within the social objective of sustainable development.

Encourage indicators such as access to playable space within walking distance for monitoring.

Chapter 5 Meeting the Challenge of Climate Change

Promote nature-based, climate-resilient play spaces (shade, water, planting) as part of adaptation strategies. Link school streets, green corridors and playable routes to heat, air quality and flood resilience.

Chapter 10: Securing Clean Energy and Water

Encourage dual-use infrastructure (e.g. SuDS, rain gardens, energy education features) that also function as safe, educational play environments.

Chapter 11: Facilitating the Sustainable Use of Minerals

Encourage restoration of mineral sites as accessible, biodiverse landscapes with natural play and learning opportunities.

Chapter 13 Protecting Green Belt Land

Recognise the role of the green belt in providing nearby natural play and exploration, not only visual openness. Encourage managed access and child-friendly routes where appropriate.



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Potential Chapter-Specific Opportunities

Heritage



Heritage (Chapter 20)

Conserving and enhancing the historic environment that encourages playful interpretation of heritage (interactive trails, playful connections, child-led storytelling) and supports co-designed heritage projects with schools and youth groups, making historic environments active, lived spaces rather than static backdrops.

WHERE THE NPPF FALLS SHORT - KEY ANALYSIS

Cross-Cutting Structural Gaps

1. Children are almost absent
2. Play and Playability is not recognised as a planning priority
3. Co-design and active engagement of children of all ages is not acknowledged
4. There is no requirement for playable streets, intergenerational design, or child-friendly neighbourhoods and community-led placemaking
5. No measurable outcomes on indicators, benchmarks, minimum standards, or monitoring requirements for child-friendly or playful environments.

Critical Argument

The National Planning Policy Framework's omission of children, play, and co-design is not a neutral oversight; it represents a significant policy gap that influences planning outcomes. By failing to articulate the spatial, playful and growth needs of children, the planning system tends to marginalise the voices of those who engage with public spaces most frequently but possess the least formal power.

These gaps create ambiguity in policy, resulting in a lack of national guidance for planners, leading to inconsistent local practices where the availability of play spaces varies widely. This inconsistency weakens the justification for refusals and limits the influence of communities seeking inclusive, playful environments.

It can be argued that universally co-designed playful spaces need a reimagining of national policy, recognising children as legitimate stakeholders and acknowledging play as essential social infrastructure.

So what needs to happen?

POLICY REFORM PROPOSAL

1. New core concept: **play as social infrastructure**

Add to Chapter 2 — Achieving sustainable development

New paragraph after current para 8

Playful and child-friendly environments are crucial for social sustainability. Planning policies should focus on creating safe neighbourhoods and public spaces that encourage play, movement, and community engagement, recognising play as vital for health, well-being, and social connections.

Major Significance

Elevate play from “nice-to-have” to essential sustainability infrastructure, giving planners a clear hook.

2. Housing and neighbourhoods: **child-friendly by design**

Amend Chapter 5 — Delivering a sufficient supply of homes

Amend para 69 (small sites/mix) to include

Local planning authorities should ensure that the allocation and design of housing sites contribute to **child-friendly neighbourhoods**, including safe, accessible routes to schools, parks and play spaces, and the integration of **informal and formal play opportunities** within walking distance of homes.

New policy box in Chapter 5: “Child-friendly neighbourhood principles”

- **Safe movement on streets** and routes designed for children’s independent mobility.
- **Proximity to everyday** play opportunities within a short walk of homes.
- **Visibility** play spaces integrated into the public realm, not hidden residual land.
- **Inclusion** accessible to all ages, abilities and backgrounds.

3. Healthy and safe communities: **open play and co-design**

Strengthen Chapter 8 — Promoting healthy and safe communities

Rewrite para 92 to name children and play plainly

Planning policies and decisions should aim to achieve healthy, inclusive and safe places which encourage children's play, independent movement and social interaction, cohesive, child-friendly communities, and support co-designed public spaces that reflect the needs of different ages, abilities and cultures.

New paragraph on co-design

Local planning authorities should support and give weight to co-design processes, including the meaningful participation of children and young people in shaping public spaces, streets and facilities. (material consideration).

New requirement for play strategies

Strategic policies should be enhanced by a local child-friendly public area strategy that improves the capacity, value, accessibility, and inclusivity of play opportunities in the area.

Making explicit links with Play Strategies and Plans ensuring that the local development plan cross-references and supports these child-centred tools.

4. Transport and streets: **independent mobility and playable movement**

Amend Chapter 9 — Promoting sustainable transport

Supplement to para 104 overall transport objectives

Planning policies should support independent, safe and enjoyable movement for children and young people, including through traffic-calmed streets, safe crossings, and routes that integrate opportunities for informal play and social interaction.

New paragraph on playable streets

Local planning authorities should promote **playable streets and child-friendly designs**, ensuring streets serve as shared social spaces while maintaining safety and accessibility for all users.

5. Design: **playful, inclusive, co-designed public**

realm

Strengthen Chapter 12 — Achieving well-designed places

Change para 130 good design criteria to include

Developments must include

playful, stimulating and inclusive places, integrate co-designed public spaces, where local communities—including children and young people—have shaped the design and ensure that public realm and open spaces are usable, legible and welcoming for all ages and abilities.

New paragraph on design codes

Design codes and master plans should **include clear standards for child-friendly and playful environments**, covering street design, public spaces, landscape, and the boundary between private and public areas. Should be advised by engagement with children and young people.

6. **Green infrastructure and nature-based play**

Improve Chapter 15 — Conserving and enhancing the natural environment

Add to para 174 multifunctional green infrastructure

Green infrastructure should be planned and designed to deliver social as well as environmental benefits, including nature-based play, outdoor learning and child-friendly access to natural spaces, while safeguarding biodiversity and landscape character.

New paragraph on child-friendly green spaces

Local planning authorities must ensure that green spaces are accessible and welcoming to children and young people, providing opportunities for casual play, adventure, and interaction with nature, while also being aligned with environmental goals.

7. Decision-making and material considerations

Evidence-led approach which recognises **child-friendly and playful design** as a material consideration

New cross-cutting paragraph (decision-taking section)

In this phase, it's important to consider how a proposal impacts the design of child-friendly, playful, and inclusive environments. This includes evaluating the quality, accessibility, and safety of play opportunities, as well as the involvement of children and communities in the design process.

Result

It provides officers and inspectors a clear legal basis to reject proposals that reduce play opportunities and child-friendliness, while also supporting those that enhance them.

7. Decision-making and material considerations

Ensure that there is clear guidance on the expectation at local plan and

development proposal levels for the **child's voice**

There should be evidence at both levels of planning that the enhancement

around children's needs, options and solutions is **child-centred and**

designed with children not for children

This means that any Statement of Community Involvement or 'consultation' has to show that the 'how' method was truly inclusive and utilised recognised child-friendly engagement techniques

Where children's voice has not been sought or generated in assumptive or 'on

behalf of' fashion, this should be a **material issue** in whether a policy goes forward for adoption, or a scheme is determined through the planning process

The above should be reinforced by the **age protected**

characteristic in the Equalities Act 2010

Result

It provides planning committees, officers and inspectors a clear way forward when approving local plans and applications and focuses their minds of ensuring truly child friendly proposals have been rigorously tested

KEY BENEFITS

Benefits that will arise from planning policy reform

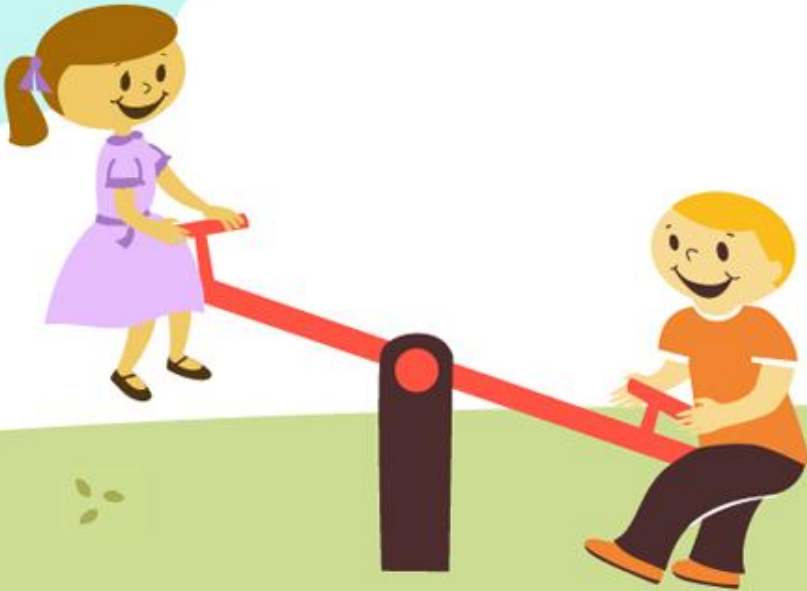
Aspect	Benefits
Recognition of children in planning	A firm, clear voice for children in the planning and development policy Strong policy backbone giving agency to children The UN Convention on Rights of the Child and the UN Sustainable Development Goals are firmly embedded and promoted
Policy on play	Robust thinking on play and playfulness embedded in policy Professional planners think beyond play provision to creating much more of a playfulness culture
Co-design and participation	Clear expectations laid out for co-design engagement and participation Traditional 'binary' methods of consultation are dispensed with, especially in relation to placemaking of open space, green/blue areas and public realm
Child-friendly public areas	Accessibility and inclusion for children and youth is embedded right from the outset in design rationale and approaches The principles of universal design are strongly upheld, building on Section 149a of the Equality Act
Mobility and independence	Children are given the right to explore and discover within spaces and places Accessibility at the pedestrian scale is fully respected and active travel principles strongly advocated

Comparative Table: UK vs Other Child-Friendly Planning Frameworks - 2026

Aspect	Benefits
Nature-based play and green space	<p>Playspace and opportunities for play are planned for more creatively, with more informal and flexible provision</p> <p>Playable and playful spaces are thought about early in the planning process and children are given freedom to design and shape their local environment</p>
Policy integration and delivery	<p>International policy and strategy is firmly reflected in the NPPF around participation rights and sustainability</p> <p>Policy links to the Equality Act 2010 are made much more specific – with ‘age’ focusing on younger people and children</p> <p>Local Plan have a clear policy on play - going beyond provision to consider how the environment can be made more ‘playful’ – for both children and adults</p>
Monitoring and accountability	<p>Measurement of success is not driven by quantum of public open space, green areas or play provision – but by the quality-of-life outcomes that are generated</p> <p>Children’s voice forms a strong part of the monitoring regime with local planning authorities accountable to children and youth forums and other ‘voice’ mechanisms</p>
Spatial justice and inclusion	<p>Children have the right to shape their own places and spaces, in the short, medium and long term</p> <p>Influence can be exerted at a 20 yr+ timescale (local plans) down to local scheme development</p> <p>A clear mechanism for including, vocalising, capturing and evaluating children's voice is reinforced by the NPPF</p>

HOW DO WE COMPARE TO OTHER COUNTRIES' CULTURES, SYSTEMS AND APPROACHES?

- This section of our response sets out how the UK planning system and the NPPF approach matches up against policy and best practice in other locations across the world.



The importance of benchmarking and understanding other countries' approaches

Compared to European and international frameworks, the December 2025 draft National Planning Policy Framework (NPPF) stands out for its lack of integration of children's rights, play, and co-design at the national policy level.

While other countries incorporate children's needs through statutory duties, national design standards, or rights-based frameworks, the NPPF treats children as invisible within planning policy.

The analysis on the following pages helps us understand where the UK planning system in benchmarked

How Other Countries Embed Children's Rights in National Planning Policy, Legislation and Professional Culture

1. ENGLAND (NPPF – December 2025 Draft)

! Children's rights are NOT embedded in national planning policy.

No reference to children, play, child-friendly environments, or co-design.

No requirement for child impact assessments, play strategies, or child-friendly design standards.

National policy is adult-centric, focusing on housing delivery, economic growth, and infrastructure.

Local authorities may choose to be child-friendly, but nothing in national policy requires it.

2 NETHERLANDS – National Spatial Strategy & Child-Friendly Planning Traditions

✓ Children’s rights embedded through National Planning Principles

National policy emphasises “living quality”, which explicitly includes children’s mobility and access to play.

Dutch planning requires safe routes to school, traffic calming, and neighbourhood playability.

The Netherlands pioneered “Woonerf” (home zones), now embedded in National Design Standards.

Children’s rights **are normalised** as part of national spatial quality—not optional.

3 DENMARK – National Planning Report & Design Culture

✓ National policy emphasises person-centred design, including children

National planning guidance requires municipalities to prioritise safe, accessible public spaces.

Children’s independent mobility is a national indicator of liveability.

Co-design with children is widely used and supported by national design institutions.

Denmark treats **children’s mobility as a national planning outcome**, not a local add-on.

4 NORWAY – Planning and Building Act (National Law)

✓ Children’s rights are legally protected in planning

The Act requires municipalities to appoint a Children’s Representative in planning processes.

All local plans must demonstrate how they protect children’s interests, including play and safety.

Child impact assessments are mandatory for major developments.

Norway embeds children’s rights at **the statutory level**, far stronger than the NPPF.

5 SWEDEN – National Policy on Child Rights & Planning

✓ National legislation incorporates the UNCRC

The Municipal planning must consider children’s rights, including play, participation, and safety.

National guidance requires child impact analyses for spatial plans.

Co-design with children is encouraged and widely practised.

Sweden integrates children’s rights into national law, not just planning guidance.

6 SPAIN – Barcelona’s Child-Friendly Urban Strategy (Nationally Influential)

✓ National urban agendas reference child-friendly principles

Barcelona’s model has influenced national urban policy on superblocks, play streets, and the public realm.

National guidance emphasises public space as social infrastructure, including for children.

Spain frames play as part of urban health and climate resilience, giving it national relevance.

7 GERMANY – Federal Building Code & “Spilleitplanung”

✓ National law requires provision for children

Federal law mandates adequate play space in residential development.

“Spilleitplanung” (play space planning) is a national framework used by municipalities.

Children must be consulted in the design of play spaces and neighbourhoods.

Germany embeds play in national building law, not discretionary guidance.

8 UNICEF Child Friendly Cities Initiative (Global)

✓ National governments partner with UNICEF to embed child rights

The framework includes indicators, participation standards, and play requirements.

Adopted nationally or municipally in Italy, Finland, Slovenia, South Korea, Canada, and many African countries, South Africa, Mozambique and Senegal.

UNICEF provides a rights-based national framework that the UK has not adopted.

PRECEDENT COMPARISON

Comparative Table: UK vs Other Child-Friendly Planning Frameworks – as at 2026

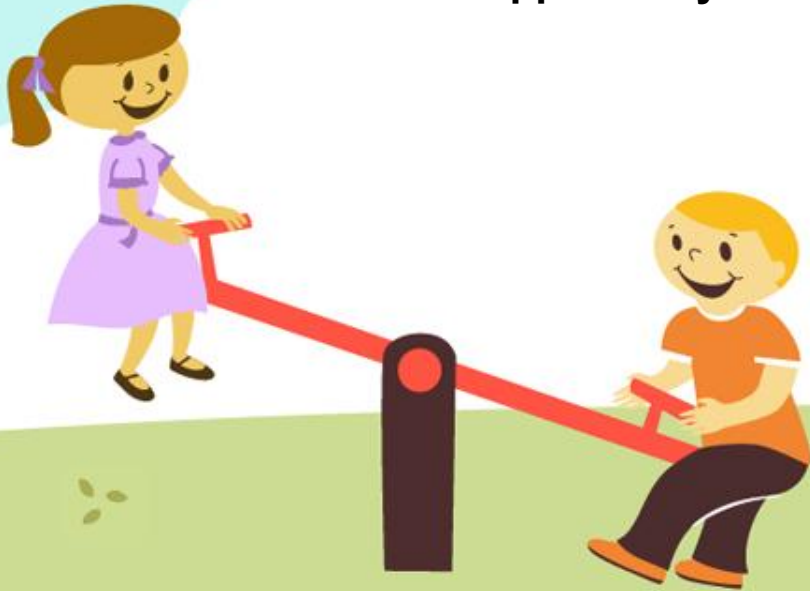
Dimension	UK – National Planning Policy Framework (NPPF)	African Precedents	Scandinavian Precedents (Norway & Sweden)	German Precedent	Netherlands Precedent
Recognition of children in planning	Children are not explicitly recognised as stakeholders in planning decisions.	Children are central to planning in initiatives like UNICEF Child Friendly Cities and Play Africa.	Children recognised as rights-holders; UNCRC embedded in law (Sweden); Norway mandates a <i>Children’s Representative</i> in every municipality.	Children are recognised in federal guidance; many cities adopt <i>Kinderfreundliche Kommune</i> (Child-Friendly Cities) certification.	Strong municipal recognition; children routinely included in spatial visions (e.g., Utrecht, Rotterdam).
Policy on play	No dedicated policy on play; play is not defined or treated as infrastructure.	Play is recognised as a right (UNCRC) and a planning priority in South African and pan-African programmes.	Play is defined as a right; municipalities must provide adequate play environments.	Play integrated into urban design standards; Berlin’s <i>Spielplatzgesetz</i> mandates provision of play areas.	Play embedded in neighbourhood design; “Woonerf” (home zones) prioritise children’s play and safety.
Co-design and participation	Engagement is encouraged, but co-design is not required or defined	Co-design with children is embedded in practice (e.g. Play Africa, UN-Habitat Future Cities Challenge).	Co-design is required in many processes; Norway mandates child participation reviews.	Strong culture of participatory planning; child workshops common in regeneration projects.	Co-design embedded in planning culture; children involved in street redesign and mobility planning.
Child-friendly public areas	No standards or expectations for child-friendly streets, parks, or public spaces.	Child-friendly design principles guide public space interventions (e.g. green play spaces, safe mobility).	National guidelines require safe, stimulating outdoor environments; informal play protected.	Cities like Freiburg and Hamburg implement child-friendly street design and green courtyards.vvvv	Public realm designed for playability; shared streets and low-traffic zones prioritise children.
Mobility and independence	Transport policy focuses on adult commuting; no mention of children’s independent mobility.	Independent movement and safe access for children are core to planning in UNICEF and UN-Habitat programmes.	Independent mobility is a core planning principle; safe walking/cycling routes mandated.	Safe routes to school programmes are widely implemented; traffic calming is prioritised.	World-leading cycling infrastructure enables high levels of child independent mobility.

Comparative Table: UK vs Other Child-Friendly Planning Frameworks – as at 2026

Dimension	UK – National Planning Policy Framework (NPPF)	African Precedents	Scandinavian Precedents (Norway & Sweden)	German Precedent	Netherlands Precedent
Nature-based play and green space	Green infrastructure is framed ecologically, not socially; no mention of nature-based play.	South African research links green space to child development and spatial justice.	Nature-based play integral to planning; outdoor learning embedded in policy.	Strong integration of green courtyards, forest schools, and natural play areas.	Green-blue infrastructure designed for play, climate resilience, and social use.
Policy integration and delivery	No statutory requirement for play strategies or child-friendly audits.	Some African cities integrate child-responsive planning into municipal strategies (e.g. Mozambique, Senegal).	Norway requires Child Impact Assessments; Sweden requires UNCRC compliance in planning.	Municipal play strategies common; legal requirements for play provision in some states.	Integrated neighbourhood planning includes play, mobility, and social infrastructure.
Monitoring and accountability	No indicators or benchmarks for child-friendly environments.	International frameworks use child-rights indicators and participatory monitoring (e.g. UNICEF toolkits).	Mandatory reporting on children’s wellbeing and participation (Sweden).	Certification schemes (e.g., Child-Friendly Cities) include monitoring frameworks.	Municipal dashboards track mobility, safety, and access to play.
Spatial justice and inclusion	Equity is referenced but not linked to children’s spatial experience or play deprivation.	African precedents explicitly link child-friendly planning to spatial justice and inclusive urban development.	Child rights embedded in welfare state; planning emphasises universal access.	Strong focus on social inclusion and equal access to green/play spaces.	Planning emphasises equitable access to mobility, green space, and public realm.

STEERING GROUP IMPACT STATEMENT

- In conclusion, the joint Steering Group (University of Worcester, University of Gloucestershire and Play Worcester) have provided a 'call to action' for further changes to the NPPF, fully grasping the opportunity to make this key national policy truly child friendly.



Steering Group Impact Statement

In summary, the Steering Group fully endorse the contents of this NPPF consultation response.

In particular the Steering Group calls for further changes to the NPPF to enable –

- Children to have true voice and engagement in the planning process. It is vital to empower those without voice and who are often marginalised
- The planning system to urgently reinforce and recognise international conventions and charters as well as UK national legislation – including the UN Convention on Rights of the Child, the UN Sustainable Development Goals and the Equality Act 2010. The UNCRC needs to be embedded in way local communities and town/places are shaped.
- Strengthening and advocating the key principle of universal design – especially from a child-centred perspective

Steering Group Impact Statement

The Steering Group also calls for further changes to the NPPF to enable –

- Meaningful and effective engagement with children and youth around planning policy and development proposals – this needs to adopt a truly participative and engagement approach and should not merely be ‘consultation’
- Enhanced intergenerational thinking and planning for places in a way that embraces the importance of intergenerational co-dependence, co-existence and mutual respect
- Effective development and delivery of professional training and learning to reflect international best practice – including refreshed content within planning degrees and continued visibility of playful communities and children’s voice within CPD programmes (Royal Town Planning Institute, Town and Country Planning Association and wider professional bodies dealing with the built environment).

STEERING GROUP MEMBERS

University of Worcester

- Michelle Malomo (MA Play and Playwork), Senior Lecturer
- Dr Emma V Richardson, (PhD Disability Studies), Senior Research Fellow Inclusive Sport
- Lisa Mauro- Bracken, (Masters in Public Health), Fellow HE, Principal Lecturer - Health and Wellbeing
- Dr Sean Bracken, PFHEA, Principal Lecturer, Coordinator of Inclusion by Design Group
- Stephanie Jones, The HIVE (joint Worcestershire County Council / University of Worcester initiative)
- Theresa Oakley, The HIVE (as above)

University of Gloucestershire

- Jon Harris, (MRTPI, FCILT, BA Geog, PG Dip TP), Senior Lecturer/Urban Planning Course Leader

Play Worcester

- Nicola Stobbs, Senior Honorary Research Fellow (UoW), Chair Play Worcester,
- Kate Collier, Worcester City Cllr, Children and Young People's Champion, Trustee Play Worcester

