

Written evidence submitted by Play England to The Children’s Wellbeing and Schools Bill Committee (CWSB254).

About Play England

Play England is the national organisation dedicated to championing every child’s right to play. We work collaboratively with local authorities, community groups, schools, and national policymakers to ensure that children and young people have access to high-quality play opportunities in both formal and informal settings. Our vision is for a child-friendly England where play is recognised as essential to children’s development, wellbeing, and happiness. Through advocacy, research, and policy engagement, we promote environments that allow children the freedom, time, space, and opportunity to play, ensuring that play is embedded in planning, design, and decision-making at all levels.

At the heart of our work is a commitment to advancing the United Nations Convention on the Rights of the Child (UNCRC), particularly Article 31 and General Comment No. 17, which affirm the fundamental right of every child to engage in play and recreation. We strive to ensure that this right is recognised, protected, and implemented across government, civil society, and industry through inclusive, sustainable, and equitable play opportunities. By fostering strong partnerships and advocating for policies that prioritise play, we aim to create a society where play is valued, supported, and accessible to all children, regardless of their background or circumstances.

Executive Summary

- Children’s opportunities for play have significantly declined since the 1980s, impacting their physical and mental wellbeing.
- Play is fundamental to children’s development, wellbeing, and resilience, yet current legislative and policy frameworks in England fail to protect or promote play opportunities.
- England lags behind Wales and Scotland, which have Play Sufficiency legislation ensuring children have access to time, space, and opportunities for play.
- There has been **no national play strategy in England since 2008**, which was developed by the last Labour government, together with Play England.

Government Actions Required

1. Introduce Play Sufficiency legislation in England:

- Amend the Children’s Wellbeing and Schools Bill to require local authorities to assess and secure sufficient play opportunities.
- Introduce Play Sufficiency regulations via a statutory instrument, similar to Wales (2012) and Scotland (2023).
- Align with the forthcoming Planning and Infrastructure Bill to ensure play sufficiency is fully integrated into national and local planning frameworks.

2. Develop and implement a new National Play Strategy:

- Establish a cross-departmental strategy involving DCMS, MHCLG, DfE, DHSC, and DfT.
- Engage key stakeholders—including local government, play professionals, parents, and children—to shape national play policies.

Why We Are Submitting Evidence

There is a growing crisis in children's play. Over recent decades, urbanisation, traffic-dominated neighbourhoods, inadequate planning policies, and reduced public space have severely limited children's freedom to play. This decline in play opportunities has had devastating consequences for children's health, wellbeing, and development.

This crisis was highlighted in **Play England's Open Letter to Government** (July 2024), which called for urgent action to reverse the decline in play opportunities.

The urgency of this issue was underscored during the Westminster Hall debate on the 8 January 2025, led by Tom Hayes MP. The debate expanded beyond playgrounds, recognising the importance of unstructured free play, adventure playgrounds, active play, and the essential role of Playworkers.

MPs raised serious concerns about how funding cuts have led to the deterioration of play spaces and a stark decline in play provision. The lack of a long-term National Play Strategy was identified as a major barrier preventing children from accessing quality play opportunities.

At the heart of the debate was **strong, cross-party support** for Play England's manifesto, calling for;

- **Play Sufficiency legislation** to ensure every child has access to safe and inclusive play spaces.
- **A new National Play Strategy**—a comprehensive framework to embed play sufficiency into national and local policy.

Based on this evidence, we urge the Government to introduce Play Sufficiency legislation in England and develop a new National Play Strategy, to ensure that the importance of play is recognised, valued, and protected across government and wider society.

Proposed new clause in the Bill

Play England is proposing a **new clause** to introduce a **Play Sufficiency duty** within local government responsibilities, aligning with the overarching aims of the Children's Wellbeing and Schools Bill.

Embedding play sufficiency within the Bill would enhance its focus on wellbeing while strengthening existing legislative and policy framework, including recent updates to the National Planning Policy Framework, which now provides protection for 'formal play spaces'.

Additionally, the provision for a new **National Play Strategy**, with the flexibility to introduce further regulations through statutory instruments, ensures that this provision remains adaptable to future needs while maintaining a clear statutory foundation.

The proposed clause has been drafted to be legally robust setting out a defined duty for local authorities to assess, secure, and enhance play opportunities while allowing for effective national oversight through guidance from the Secretary of State.

This approach ensures that children's wellbeing and right to play are properly recognised within local government decision-making, without imposing excessive or impractical burdens.

Proposed draft:

1. Promoting Children's Wellbeing Through Play Sufficiency

(1) Local authorities in England must, so far as reasonably practicable, secure and maintain sufficient play opportunities for all children in their areas.

(2) In fulfilling this duty, local authorities must—

- (a) assess the sufficiency of play opportunities at intervals specified by regulations;*
- (b) secure, enhance, and protect play opportunities where gaps are identified;*
- (c) publish and maintain a policy statement on improving children's wellbeing through play, including plans to address deficiencies in provision;*
- (d) embed play sufficiency considerations into local planning, development, and infrastructure policies;*
- (e) ensure all children have access to inclusive, accessible, high-quality, and sufficient play opportunities;*
- (f) consult regularly with children, families, and communities to inform decision-making on play sufficiency.*

(3) In this section—

- (a) “play” includes any recreational activity;*
- (b) “play opportunities” include spaces and places for play, the play workforce, supervised play provision, and the extent to which local authority policies secure, enhance, and protect play opportunities;*
- (c) “sufficient”, in relation to play opportunities, means sufficient having regard to quantity, quality, accessibility, and inclusivity.*

2. A National Play Strategy

(1) The Secretary of State may publish a National Play Strategy, providing guidance and setting out a framework for promoting play sufficiency and wellbeing.

(2) The Secretary of State may, by regulations, make further provisions to give effect to this section, including—

- (a) procedures for conducting and publishing Play Sufficiency Assessments;*
- (b) guidance for local authorities on fulfilling their play sufficiency duties;*
- (c) requirements for local authority policy statements and action plans;*
- (d) measures to secure, enhance, and protect formal and informal play spaces;*
- (e) integration of play sufficiency duties within planning and development frameworks.*

(3) Regulations under this section must be laid before Parliament and are subject to the affirmative resolution procedure.

Conclusion

England is falling behind in supporting children’s right to play, with Wales and Scotland leading the way in Play Sufficiency legislation.

Introducing Play Sufficiency legislation and developing a new National Play Strategy would ensure that children’s play is protected, valued, and embedded into national policy and local decision-making.

We, and sector partners, stand ready to support the Government in addressing the decline in children's play. This strategy would ensure that Play Sufficiency legislation is brought into meaningful practice, and that England becomes a child-friendly country where all children have the freedom to play—at home, at school, and in their communities.

Delivering these first steps will depend on bringing together government departments (MHCLG, DfE, DCMS, DHSC, and DfT) with national agencies, stakeholders, and children, as was done in 2008.

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