

16th July 2021

Mr S Reid
Chief Executive
Ards & North Down Borough Council
Town Hall
The Castle
BANGOR
BT20 4BT

Dear Stephen

Ards and North Down Play Strategy – 2021-2032

The Association welcomes the publication of the draft play strategy and, in particular, the recognition of the important role of play in each and every child's development. We do however have a number of key concerns which I have been asked to set out for consideration. These are:-

1. Consultation – We have a number of very serious concerns regarding the consultation.
 - a) The number of responses to the on-line survey totalled 298 but yet, NISRA latest population estimate puts the borough's population at over 162,000 and LPS report that there are over 71,000 domestic properties on the LPS register for the borough. This data forces us to conclude that the response rate is not sufficient to draw any robust conclusions. Donaghadee, in particular, only attracted 6 responses.
 - b) We note that the Donaghadee Town Advisory Group was not consulted - an alarming omission especially given its role.
 - c) Donaghadee residents had they known about it would have been lumped in with Bangor!!
 - d) Why were children and teenagers not consulted as to what sort of facilities they would want? I am quite confident that schools and youth groups would have welcomed the opportunity to be involved.

There is thus little evidence to support the assertion on page 36 that the strategy has been developed with "extensive consultation". While many of the conclusions drawn from the consultation may well be accurate they do need to be viewed with a high degree of caution.

2. While the strategy discusses forms of play other than at playparks there is little by way of conclusions or recommendations regarding this dimension. We note in particular the absence of any reference to the Council organised Summer Schemes currently operating from community centres in Bangor, Newtownards, Holywood, Ballygowan and Portavogie. An assessment of the value of such provision and the

possibility of expansion including the benefits of some form of mobile provision across the whole borough would have been helpful. Play can take many forms and a mobile unit could be provided offering a range of activities such as sports, arts and crafts etc etc. As it stands the document is more of a Playpark Strategy than a Play Strategy. Proposals to remove playparks are very firm yet the provision of facilities such as MUGA pitches, skateparks are prefaced by “potential”.

3. The assertion on page 80 that Donaghadee has an over provision needs the caveat “on the basis of the Fields in Trust guidelines”. However the footnote on page 6 of the guidelines states “*Quantity guidelines should not be interpreted as either a maximum or minimum level of provision; rather they are benchmark standards that can be adjusted to take account of local circumstances.*” We would also suggest that the authors have been quite selective in quoting from the Guidelines, in particular the omission of the Table 4 and provision of playing pitches etc.
4. We note the reference to the Strategic Planning Policy Statement and in particular PPS 7 and PPS 8 in Chapter 3 and paragraph 6.3. It would be useful if the document had then quoted some good examples of where developers have provided green space for play and/or a play facility subsequently passed to the Council. To what extent can the Planning Department force a developer to make such provision? If not, how does the regulatory framework compare to that elsewhere – should councils be pushing for stronger powers in this area?
5. We would contend that Donaghadee has an appropriate blend of provision as it has 6 playgrounds with 2 in each tier:-
 - Commons and Lemon’s Wharf – Tier 1
 - Beechfield and Northfield – Tier 2
 - Hunts Park and Pinks Green – Tier 3Tier 3 provision is particularly important for those children (possibly on the autistic spectrum) who have difficulty in the larger, busier, Tier 1 playgrounds. Thus in the case of Donaghadee the playgrounds at Hunts Park (a 2 child swing and a rocker) and Pinks Green (a 4 swing unit, a rocker and a chute) meet this need.
6. Given the importance that the authors attach to play, we are at a loss to understand why any playground should be closed. Even at that we would have thought, unless the land was needed for another purpose or was being disposed of, that a playground would have been allowed to see out its lifespan. We would also have expected to see a cost benefit analysis showing the cost of maintenance as against the cost of removal.
7. Turning now to the proposals in relation to playparks at Beechfield and Pinks Green we would make the following points:-
 - a) Beechfield – This playground is located in a ward which has fallen into the top 25% of deprived wards in Northern Ireland (NISRA MDM data). Children in this area need all the help and support that can be provided and taking a well-used play facility away runs counter to this. The playground is within sight of

many houses and children can play quite safely and happily. The proposal to close the playpark and force the children to walk a quarter of a mile, out of sight of their family and being required to cross a very busy road is quite frankly irresponsible.

- b) Pinks Green – Before its demise, the former Ards Borough Council floated the idea of closing this playground and selling the land for housing only to be met by stern local opposition. This area was passed to Donaghadee Urban Council by Samuel Pink (hence the name) and we understand that there is a restriction on possible resale. In any event, a proposal to dispose of this area will be met by strong local opposition. Setting that to the side we note that this is a very small playpark which, nevertheless, is well used. We assume it costs comparatively little to maintain the current level of provision and on that basis, assuming the land is to be retained, any savings from removal will be minimal.
8. We fully support the conclusions regarding the lack of provision for teenagers. Current provision across the borough does not in any shape reflect relative need and the Peace Programme in particular has been used by the Council to provide facilities for teenagers at Comber, Killinchy and Portavogie without any apparent analysis and prioritisation of needs elsewhere in the Borough
9. We have a number of other points which, while important, are less so when viewed against the foregoing:-
- a) Timespan – Is there any particular reason for an 11 year play strategy? On the face of it, eleven years seems quite long and at variation with most other Councils who appear to opt for a much shorter timeframe. Much better to have a shorter timeframe complete with an assessment of relative priorities set out in a deliverable Action Plan. A long timeframe just frustrates communities - they see their project listed only to see successive Councils simply acknowledge the need but use a lack of resources as the excuse for doing nothing (the non-delivery of the Donaghadee Masterplan 2015 is a case in point). Also given the popularity of the borough, new housing developments and the area plan being developed it will need to be updated on a regular basis.
 - b) Figures 1, 2 and 3 on pages 20-22 require further explanation regarding the boundaries being used, what is meant by tiers etc. Tiers are only explained on page 48. We would also point out that while meeting the needs of the resident population is a priority, so too is meeting the needs of visitors. Lemons Wharf in particular has attracted visitors to the town, bringing much needed additional footfall for local traders.
 - c) Table 2 is informative but very general. What would be helpful would be for each playpark location, what facilities it has, its tier, its condition, when last refurbished and maintenance cost in each of the last say 5 years ie the detail on page 86 expanded for each playpark. Such a level of detail may not be easily produced, in which case the costing system needs reviewed so that this information is readily available in the future.

- d) Table 3 helpfully sets out the cost of installation but some information on lifespan, annual maintenance would be useful
- e) The footnote on page 46 refers to mid-Ulster council (obviously a cut and paste!!)
- f) We note the proposal that the Council employ a Play Development Officer and a Councillor to be a "Play~Champion". We would support the former but would see little value in the latter. Local politics being what they are the role will inevitably fall foul of party politics and we would suggest that each councillor should be a play champion.
- g) The analysis on the basis of District Electoral Area is a blatant attempt at briefing Councillors on the proposals in relation to their electorate. DEAs are meaningless to everyone except elected representatives.

In conclusion, while we welcome the introduction of a Play Strategy we are concerned at the quality of this report. It has not been constructed following the extensive consultations it claims, is limited in terms of the various dimensions of play feeding through into the strategy, in many instances it lacks underpinning evidence and the rationale for removal of playgrounds in Donaghadee is fundamentally flawed. Having spent close on a half of the document outlining the importance of play and general policy considerations we are disappointed that taking account of the increased population in the borough, the report fails to identify a need for any new playparks across the borough relying instead on upgrades (welcome these are).

I apologise for the length of this response and for its negative tone but in truth there is little to commend.

Given the importance we attach to the issue I am copying this letter to the six councillors representing our DEA.

Yours sincerely

A handwritten signature in black ink, appearing to read 'John Caldwell', with a horizontal line underneath it.

JOHN CALDWELL
Hon Secretary