

21 September 2018

Mr Anthony Roberts MP Minister for Planning and Housing Department of Planning and Environment 320 Pitt Street SYDNEY NSW 2000

Dear Mr Roberts,

### RE: The AILA response to the Draft "Everyone Can Play" document as developed by the NSW Government

The Australian Institute of Landscape Architects NSW (AILA NSW) is the local chapter representing, the growing national advocacy body of just under 4,000 active and engaged landscape architects across the country. We are committed to creating a better Australia that acknowledges the benefits that natural systems can provide for our physical and mental health.

Landscape architects have the skills and expertise to resolve a diverse range of complex issues with innovative, integrated solutions demonstrated in many award-winning projects across Australia.

We can contribute leadership, creativity and innovation as landscape architects collaborate with many varied disciplines and stakeholders striving to achieve better, healthier environmental, social and economic outcomes for the built environment. Projects include varying scales from citywide strategies to the redesign of local parks. Landscape architects within government and in private practice work alongside other government and allied professionals in building stronger communities through making places and spaces more sustainable, productive and enjoyable for all.

We welcome the opportunity to provide comment on the Draft Everyone Can Play Guideline and thank you for considering our feedback.

This is a new design guide and tool, and hence of great importance to the NSW Landscape Architecture community. Currently it presents pleasantly, but if it is to be endorsed and referred to by the NSW design community, it must use recognisable design references, language, terminology and diagrams. This is essential, or it will become a well-intentioned document like the ones that precede it e.g. "The Good Play Space Guide: I can play too" (2007), which is placed on shelves, but not referred to by clients or designers. In order for this document to have the desired *gravitas*, uptake and usability, the language, diagrams and overall presentation must go beyond its current "chatty" and "funky" presentation, and sit in the realms of a credible, authentic document which will stand the test of time.

### **General Comments**

- Australian Standards should be mentioned and listed in the document e.g. Playground Standards, and Access & Mobility Standards.
- Definitions and Terms in the document should mirror those used in the Standards e.g. Fallzones are now "Impact Areas".
- Play providers will need some guidance or commentary about which playgrounds in their jurisdiction could be/should be inclusively designed. Lack of guidance will lead to varied interpretations, and lack of take up.

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- Some scaled plans in the document (examples) would be of great assistance to designers and play providers.
- More diagrams showing design principles would greatly assist.
- More photos illustrating points made in the document would further assist understanding e.g. a child with a disability playing a musical instrument.
- Emphasis to be placed on using known design language rather than "catch phrases" which lead to confusion. E.g. does "fit" mean fit for purpose, or the size of an element, or fit of an element in the overall space, or does it mean getting fit? (page 29).
- There should be a glossary of terms, a list of resources, and useful links (at back of document).
- Evidence-based design practice is not referred to, nor is any referencing of research outcomes. This is disappointing as it adds to the document's relevancy. An appendix would be useful.
- The overall philosophies of Inclusive Play are missing and belong after the definition for e.g. "Something for everybody not everything for everybody" as well as "side-by-side play" and "Intergenerational play" and "do what you can with what you've got" philosophy, along with a few others.
- Some more statistics, and the source and year of those statistics, would be helpful to play providers who need to argue the case for inclusive play e.g. 1:4 Australians are born overseas, 1:5 Australians have a disability etc. etc.
- The legislative and policy frameworks may be good to touch on e.g. Disability Discrimination Act, National Disability Strategy etc. Perhaps an Appendix?

## Sections

- a) Letters
  - More sophisticated language (less chatty and informal). Playgrounds are not "Storied" places, but perhaps "central"?
  - Acknowledge organisations involved in the Advisory Group (with permission). This gives the document credibility.
- b) "Inform" Section
  - "Introduction" as the title may be a more easily understood section heading than "inform".
  - Definition of a playspace needs to align with Australian Standards, and mention people of differing ages, gender, culture and ability (page 10). Another, differing definition is provided on page 12. Provide one all-encompassing definition.
  - Universal Design principles and goals need to be further clarified.
  - The Design Context of the guide needs more explanation. Discussion of the overall philosophy needs to be added, as well as the design approaches (e.g. Universal Design, Social Design, User-Centred Design, Observational Design).
  - The definition and types of play should be summarised, as it is a document about play. This is of paramount importance.



# c) "Consider" Section

- Title not clear. Perhaps Design Framework is more appropriate.
- Hierarchy of sub-sections not easy to follow. Consider numbering or changing font size.
- "Commitment" not clear as a heading in Page 19 not clear design/planning language.
- Page 22: "Design Process" as a heading needs to be added.
- The framework of Can I get there, Can I play and Can I stay should be followed by Design Principles. "I" could be more appropriately be "we".
- The 6 design principles are unclear, and need to use more direct, easily understood and commonly used design language.
- Bullet points need to explain the principles rather than ask questions.
- Red boxes not directly useful delete or add further explanation..
- Recommend a complete re-write of this section: it is not working and will not guide local government playground providers or designers as much as it could. Readers will be lost at this juncture.
- d) "Tools" Section
  - "Best Practice Design Recommendations" are not recommendations *per se*, but rather are 7 Best practice Inclusive Design Considerations.
  - The 6 columns with red spots do not add anything to the text (delete).
  - Number the headings to assist with legibility.
  - Wayfinding points to be further developed this section is very scant. Include cues for orientation and use throughout the playground e.g. colour luminance contrast.
  - Additional play types to be listed e.g. flying foxes, bouncing elements, monkey bars, crawling, see-saws, rocking, water play etc. The current list is limiting.
  - Explain concept of graduated play challenges, and side-by-side play experiences.
  - Discuss the importance of risk, and risk-benefit analysis (under "safety"). This is of fundamental importance to this form of design and play provision, and is linked to the Standards.
- e) Evaluation Checklist
  - Does not mirror the Best Practice Inclusive Design Considerations, and it must.
  - "Yes" or "no" is probably too categoric. There are also multiple questions in some points, which need to be separately listed. Consider a scale of 0-5.
- f) Appendices
  - Several appendices are required in this document, such as glossary, links, references, example projects in NSW.



### Conclusion:

Inclusive play is open to many interpretations by both clients and designers of public playspaces. We need this new document to give clear guidance on this complex and sophisticated topic, and to this end, the document needs further work.

AILA would value continuing the process of involvement in the next iteration of this valuable document.

Sincerely,

F. Robbé

Fiona Robbé AILA Representative – Registered Landscape Architect Australian Institute of Landscape Architects