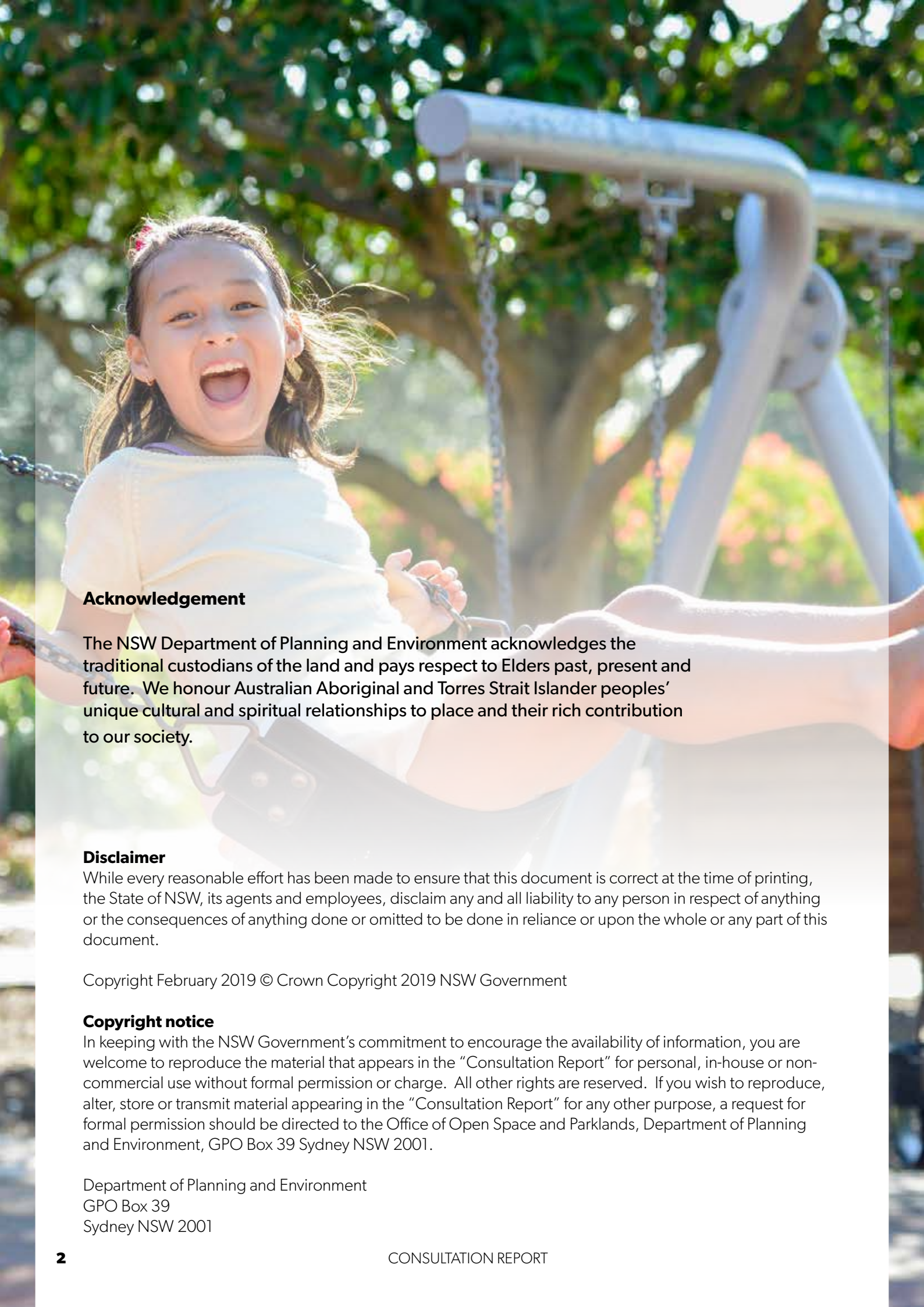


EVERYONE CAN PLAY

CONSULTATION REPORT





Acknowledgement

The NSW Department of Planning and Environment acknowledges the traditional custodians of the land and pays respect to Elders past, present and future. We honour Australian Aboriginal and Torres Strait Islander peoples' unique cultural and spiritual relationships to place and their rich contribution to our society.

Disclaimer

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Department of Planning and Environment
GPO Box 39
Sydney NSW 2001

INTRODUCTION

Inclusive playspaces are
for everyone



Background

In November 2017, the Minister for Planning launched the draft Everyone Can Play Guideline promoting the planning, design and delivery of inclusive playspaces that cater to people of all ages, abilities and cultural backgrounds.

The NSW Department of Planning and Environment developed the draft Everyone Can Play Guideline to support the NSW Government's commitment to encourage councils, designers and the playspace industry to create playspaces that are inclusive.

The purpose of the Guideline is to:

- Provide a playspace design guideline for councils, developers and designers to support them in incorporating inclusive design principles in the creation of playspaces.
- The Guideline provides tools to assist councils in reviewing existing or proposed playspaces and determining priorities when designing an inclusive playspace, which will improve the play experience for people of all ages, abilities and cultural backgrounds.



Purpose of this Report

This report is a summary of submissions received during public exhibition of the draft Guideline and feedback from workshops.

Furthermore, this report outlines how community and industry feedback has been implemented into the Everyone Can Play Guideline.


Everyone Can Play Guideline Process

The Everyone Can Play Guideline were developed through a collaborative process involving extensive stakeholder engagement with Advisory and Advocacy groups established to assist in the preparation of the Guideline.

At key points in its development, the Everyone Can Play draft Guideline was rigorously tested against sample playspaces. This included desktop reviews of playspaces currently in the design phase, as well as on-site assessments of existing playspaces.

The draft Guideline was exhibited to allow the public, playspace industry and councils the opportunity to submit feedback. The Office of Open Space and Parklands also held a series of workshops in 11 locations across NSW where councils and industry representatives were invited to participate and provide feedback on the draft Guideline. Comments were incorporated into the draft Guideline leading to the creation of the Everyone Can Play Guideline.

The Process

- 
- Establish a Vision
 - Understand Key Issues: Evaluate Existing Strategies, Standards and Processes
 - Workshop Key Ideas and Principles
 - Form Guiding Principles and Draft Strategy
 - Confirm Direction and Assess Principles
 - Prepare Everyone Can Play and Evaluation Criteria
 - Engagement and Feedback
 - Develop Everyone Can Play and Evaluations
 - Review and Advise
 - Refine Everyone Can Play and Test Criteria
 - Recommendations and Feedback
 - Everyone Can Play Draft Guideline
 - Exhibition
 - Everyone Can Play Guideline released

Everyone Can Play

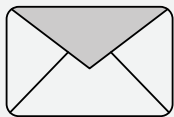
DETAILS

Details of consultation, engagement
activities and outcomes

Public Exhibition Draft Guideline

On 8 August 2018, the Minister for Planning announced the commencement of the public exhibition period for the draft Guideline.

The draft Guideline was placed on exhibition for a period of six weeks from 8 August 2018 to 21 September 2018. The document was made available via the following methods:



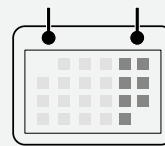
Hard copies were sent to:

- Mayors of all NSW councils
- General Managers of all NSW councils
- Open Space/ Playspace Managers of all NSW councils
- Members of the Everyone Can Play Advisory and Advocacy groups



129 councils received copies of the draft Guideline

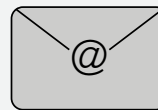
Exhibition Summary



Placed on public exhibition for 6 weeks



LinkedIn and Facebook outreach



Email notifications sent



Download available from Department of Planning website



11 Community workshop events across NSW



35 Formal submissions received

Workshops

During the public exhibition period, the Office of Open Space and Parklands held a series of workshops across Greater Sydney and regional NSW, as follows:

Date	Location	Attendees
22 August 2018	Western Sydney	20
24 August 2018	Sydney	20
27 August 2018	Wollongong	37
28 August 2018	Wagga Wagga	18
30 August 2018	Newcastle	23
31 August 2018	Batemans Bay	7
3 September 2018	Lismore	11
4 September 2018	Coffs Harbour	5
6 September 2018	Dubbo	10
7 September 2018	Tamworth	6
8 September 2018	Tathra	12

Snapshot



Newcastle Workshop

ISSUES AND RESPONSES

Summarised feedback from
community consultation
and our responses

Key issues and comments

During the public exhibition of the draft Everyone Can Play Guideline 35 submissions were received by the Office of Open Space and Parklands online and via email. Feedback was also received during the 11 workshops.

Key issues/comments from submissions and workshops were summarised into the following categories:

1. Background
2. The Inclusive Play Process
3. Tools
4. Can I Get There?
5. Can I Play?
6. Can I Stay?
7. General Comments

Background

Definitions

Comment	Response
Clarify “accessibility”, “inclusive”, “universal design”. “Accessibility” also needs to be broadened, as the current focus appears to be largely on physical disability.	The difference between accessibility and inclusivity has been explored in the section titled <i>Accessibility vs. Inclusivity</i> on page 10 of the Guideline.
The distinction between “access” and “inclusion” requires further clarification, and the word “participation” is currently missing from the definitions.	It is not the intention of the Everyone Can Play Guideline to explore all aspects of accessibility, but rather provide an insight of how it can be incorporated into playspace design. Universal design has been explored in the section titled <i>Universal Design</i> on page 28. In the <i>What is an Inclusive Playspace</i> section on page 10 it is noted that “access” is only one element of “inclusion”. Access has also been addressed within the <i>Playspace Evaluation Checklist</i> on pages 52 - 61. The <i>Importance of Inclusive Play</i> section on page 12 details why participation in play is important for all children and the associated benefits. The addition of a glossary has been considered for future program promotion on the Everyone Can Play website to provide further explanation on terms.

* Page numbers referenced refer to the Guideline

Definitions (continued)

Comment	Response
All definitions should mirror those used in the Australian Standards.	<p>It is not the intention of the Everyone Can Play Guideline to match the wording of Australian Standards.</p> <p>The addition of a glossary to provide clarity on terms has been considered for future program promotion on the Everyone Can Play website.</p>

"Can I" Framework

Comment	Response
The three "Can I" Principles should be introduced in the "Can I" Framework section of the Guideline.	The three "Can I" Principles have been introduced in the section titled "A New Way of Thinking" on page 7. The Principles are further explored on page 14 and on pages 52 - 61 in the <i>Playspace Evaluation Checklist</i> .

Inclusive Play for All

Comment	Response
The Guideline discusses inclusive play for all families, for all ages and all abilities, but there was a lack of references to inclusive play equipment and spaces for carers, adults and older adults to use.	<p>The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 encourages playspace designers to include play experiences and facilities, that caters for a range of users.</p> <p>The Guideline does not intend to prescribe the content of the playspace by informing on play equipment, but rather provide overall design principles for inclusive playspaces.</p>

The Inclusive Play Process

“Can I” Principle

Comment	Response
The “Can I” Framework gives the wrong impression that inclusive design is this simple.	The Guideline encourages designers to consider the three “Can I” principles when designing a playspace. The principles are an outline of inclusivity in playspaces and best practice design.

Case Studies

Comment	Response
Include more case studies and examples of smaller playspaces, and/or a range of smaller parks. Not all families can afford to go to the destination playspaces as discussed in the Guideline, especially those families with children or carers who have a disability.	Two additional case studies have been included within the Guideline that show smaller playspaces and what inclusive elements can be included with smaller budgets. A range of case studies will be available on the Everyone Can Play website.
The case studies are confusing and hard to read, with the call-outs making the pages appear too busy.	The case-study call-outs point directly to the inclusive elements within the playspace. The call-outs have been repositioned to provide better legibility.
Include scale drawings.	The Everyone Can Play website will have a range of information available on inclusive playspace design. The News and Story articles may incorporate scale drawings if available.

Design Principles

Comment	Response
The six Design Principles need to align with “known language” by the design community – the current meanings in the draft Guideline are unclear. The benefits of looking at these Design Principles need to be explored further.	The six Design Principles have been established through a review of current theory, research into playspace design and universal design. They are a new way of thinking and therefore differ from the “known language”.
Metrics should be included on how to achieve these Design Principles.	The <i>Design Principles</i> on pages 30 - 35 have been reworked and now explore the benefits of incorporating the design principles into playspace design. The <i>Design Principles Checklist</i> , on pages 62 - 74 in the <i>Tools</i> section of the Guideline, provides recommendations on how to achieve the six Design Principles when designing a playspace.

* Page numbers referenced refer to the Guideline

Design Considerations

Comment	Response
The words listed under Design Considerations are confusing and not helpful.	The text has been reworked to be consistent with the <i>Playspace Evaluation Checklist</i> and the <i>Design Principles Checklist</i> . The heading "Design Considerations" has been replaced with "Focus Areas".

Creating Inclusive Playspaces Diagram

Comment	Response
Provide clarification on circumstance/s when the 6 Stages to Creating Inclusive Playspaces may or may not apply to projects to ensure consistency state-wide.	The <i>Inclusive Play Process</i> section on page 20 states that not all stages will be needed for all projects.

Commitment Diagram

Comment	Response
The Commitment "map" is unclear and should be redrawn.	The Commitment "map" has been removed from the Guideline.

Plan

Comment	Response
Access to playspaces should be part of the project planning phase.	The <i>Strategic Planning</i> section on page 22 – 23 recommends playspace designers consider the distribution of existing playspaces and address gaps in provision of inclusive playspaces. The <i>Playspace Evaluation Checklist</i> on pages 52 – 61 includes recommendations on how access can be incorporated into playspace design.

Design

Comment	Response
Greater emphasis should be placed on involving children and young people in the design process of new playspaces.	The <i>Deliver</i> section on page 44 recommends consulting and collaborating with the local community, including children and young people.
The Guideline should recommend greater involvement from child learning and development experts in the design process.	The <i>Deliver</i> section on page 44 recommends undertaking community consultation and collaboration, and provides examples of who may assist in the consultation process. A range of resources will be available on the Everyone Can Play website including articles from subject matter experts.

* Page numbers referenced refer to the Guideline

Design (continued)

Comment	Response
Include recommendations to incorporate art in the design of playspaces.	The Collaroy Beach case study on page 36 - 37 includes an example of how art has been incorporated into the design of an inclusive playspace. The Guideline does not intend to prescribe the content of a playspace.
Include augmentative and alternative communication in playspaces, such as visual communication boards.	Recommendations for signage and wayfinding are included in sections <i>Playspace Evaluation Checklist</i> on pages 52 - 61 and <i>Application of Design Principles</i> on pages 62 - 74. The Guideline does not intend to prescribe the contents of a playspace, but rather provide overall design principles for inclusive playspaces.
Playspace design should incorporate comfortable and legible spaces for people of different religions and ethnic backgrounds.	The Guideline encourages designers to design playspaces in a way that caters for people of all ages, abilities and cultural backgrounds. The Guideline does not intend to prescribe the content of the playspace as this may limit design creativity.
The Guideline should encourage creation of nature play in playspaces as inclusion of natural elements is important. The Guideline provides an opportunity to advocate for environmental sustainability and include requirements that playspaces are built away from noise and pollution, provide access to recycling bins and provide access to natural features and elements.	The East Lake Playground case study on page 42 - 43 is an example of how a playspace can be incorporated into a natural setting by careful consideration of the positioning of elements in relation to natural features and the use of equipment and materials that are complementary.
Sensory and tactile elements are important in a playspace. The Guideline should recommend they are included in playspace design.	The <i>Design Principles Checklist</i> on pages 62 - 74 recommends playspaces include a variety of play experiences including sensory and imaginative play.
The Guideline needs more guidance and detail on design elements.	The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 and the <i>Design Principles Checklist</i> on pages 62 - 74 provide recommendations on design elements that should be incorporated into playspace design to make it as inclusive as possible. The Guideline does not intend to prescribe the content of the playspace as this may limit design creativity.

* Page numbers referenced refer to the Guideline

Design (continued)

Comment	Response
The Guideline should encourage designers to separate age-appropriate play equipment where possible for safety.	The Guideline encourages designers to design playspaces in a way that caters for people of all ages, abilities and cultural backgrounds. The Guideline does not intend to prescribe play equipment arrangement.
There should be an integration of green infrastructure in playspaces to facilitate active play, and for open spaces to be retained to experience a sense of freedom.	The <i>Application of Design Principles</i> on pages 62 - 74, recommends playspaces be located next to informal recreation spaces including kick-about spaces for unstructured play opportunities.

* Page numbers referenced refer to the Guideline

Tools

General

Comment	Response
The "Tools" section needs further review so that it is more concise and user friendly.	The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 has been reworked to remove questions with multiple parts and the "Yes / No" criteria has been replaced with criteria which identifies the opportunities for change. The <i>Design Principles Checklist</i> on pages 62 - 74 has been reworked to mirror the structure of the <i>Playspace Evaluation Checklist</i> for increased clarity. The criteria has also been reworked to now categorise priority.

Best Practice Design Recommendations

Comment	Response
The Best Practice Recommendations (red dots) are confusing, require explanation and context, and add no value to the Guideline. These should be deleted from the Guideline. They do not match with the Design Principles.	The <i>Design Recommendations</i> have been reworked to improve clarity. They are now titled <i>Design Principles Checklist</i> and can be found on pages 62 - 74.
The headings should be numbered for ease of reading.	The headings of the three main sections of the Guideline have been numbered. Heading titles have also been reworked to better reflect the information following them.
The idea of wayfinding needs to be further developed.	The idea of wayfinding is explored in the <i>Playspace Evaluation Checklist</i> on pages 52 - 61 and in the <i>Design Principles Checklist</i> on pages 62 - 74. The wayfinding points have been reworked for increased clarity.
The Guideline should provide further detail on different types of play.	The Guideline encourages playspace designers where possible to incorporate a range of play options into their playspaces. Section <i>Choose</i> on page 32 provides information on why it is important for children to be able to choose how they wish to play. The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 and the <i>Design Principles Checklist</i> on pages 62 - 74 encourages designers to consider providing a range of play opportunities. It is not the intent of the Guideline to prescribe what play activities should be included in each playspace.

* Page numbers referenced refer to the Guideline

Best Practice Design Recommendations (continued)

Comment	Response
Provide explanation of the concept of graduated play challenges and side by side experiences.	The Collaroy Beach Playground case study on pages 36 - 37 has been reworked to provide increased clarity regarding the meaning of "graduated play challenges". The concept of side by side experiences has been explored in the Fun for all ages article on page 21.
The Guideline should include recognition that barriers such as major roads, railway lines and rivers can impact access to facilities, not just focused on geographic proximity alone.	The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 and the <i>Design Principles Checklist</i> on pages 62 - 74 encourages the consideration of a range of potential barriers which may impact access to the playspace.
Shade provision is critical and there is little discussion about the provision of shade.	The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 and the <i>Design Principles Checklist</i> on pages 62 - 74 encourages consideration of shade within the playspace.
Referring to fencing requires rewording, as care needs to be employed to ensure that enclosure of playspaces is not confused as best practice for inclusivity.	The Guideline encourages consideration of potential hazards/ risks when designing a playspace. The Guideline recommends if there is a potential risk for the designer to consider minimising the risk through formal or informal barriers. The Collaroy Beach Playground case study on pages 36 - 37, the Westport Park Playground case study on pages 40 - 41, and both the <i>Playspace Evaluation Checklist</i> on pages 52 - 61 and the <i>Design Principles Checklist</i> on pages 62 - 74 encourage the designer to consider the context of the playspace when considering fencing.
The Guideline needs to state clearly that not every design recommendation will be in every playspace.	The Guideline encourages designers to do the best with what they have (i.e. budget, time, site constraints). This point is emphasised in the <i>About Everyone Can Play</i> section on page 14 where it specifically states the intent of the Guideline is to "help designers to do the best with what they can, within the budget and the site constraints they are faced with". This point is further emphasised within both the introduction paragraphs of the <i>Playspace Evaluation Checklist</i> on page 52 and the <i>Design Principles Checklist</i> on page 62.

* Page numbers referenced refer to the Guideline

Playspace Evaluation Checklist

Comment	Response
The Playspace Evaluation Checklist is a good starting point for conversations and to get people to think about the elements that need to be incorporated into playspaces.	The intent of the <i>Playspace Evaluation Checklist</i> is to provide designers with a tool for reviewing existing playspaces or playspace designs and encouraging designers to think of how inclusive elements can be incorporated into playspaces.
The “Yes / No” answers are too categoric and too rigid, a sliding scale would be more appropriate for this checklist.	The <i>Playspace Evaluation Checklist</i> answers have been reworked. Responses are now categorised as follows: <ol style="list-style-type: none">1. No change2. Potential change3. Change required
Many of the questions within the Playspace Evaluation Checklist have multiple parts. The checklist should be reworked so that all questions yield a single response.	Questions within the <i>Playspace Evaluation Checklist</i> which previously had multiple parts have been revised to yield a single response.
While it is understood not every design recommendation / item will be in every playspace, this point needs to be made clearer. Further clarification should be made so that if the answer is “no”, does this mean design should be halted until the answer becomes “yes”? It would be useful if there was a weighting to show that an inclusive playspace is still achievable without this element.	The <i>Playspace Evaluation Checklist</i> notes on page 52 that each playspace is unique and not all playspaces will meet every criteria of the checklist. It is about doing the best you can with the resources available. The “Yes / No” answers have been reworked. Responses are now categorised as follows: <ol style="list-style-type: none">1. No change2. Potential change3. Change required
The Guideline should include separate checklists for different sized playspaces.	The <i>Playspace Evaluation Checklist</i> has been developed to allow it to be used for playspaces of varying size. The checklist notes on page 52 that each playspace is unique and not all playspaces will meet every criteria of the checklist. It is about doing the best you can with the resources available.
The Guideline should include separate checklists for different sized playspaces.	The <i>Playspace Evaluation Checklist</i> has been developed to allow it to be used for playspaces of varying size. The checklist notes on page 52 that each playspace is unique and not all playspaces will meet every criteria of the checklist. It is about doing the best you can with the resources available.
Provide the Playspace Evaluation checklist in a smaller format (e.g. handbook, one page “cheat sheet”) for ease of use.	The Everyone Can Play Guideline, including the <i>Playspace Evaluation Checklist</i> , will be available for download on the Everyone Can Play website. Users will be able to print the checklist smaller if they wish.

Can I get there?



Access/Transport

Comment	Response
<p>Access to the playspace should be part of the project planning phase.</p> <p>The Guideline should highlight the need to link playspaces with active and integrated transport routes suitable for wheelchairs, bicycles, pedestrians and public transport.</p>	<p>The Guideline recommends considering access when undertaking renewal/ upgrades to an existing playspace or when considering the location of a new playspace. Access and site context recommendations, including potential transport linkages, can be found within the <i>Design</i> section on page 26 and throughout both the <i>Playspace Evaluation Checklist</i> on pages 52 - 61 and the <i>Design Principles Checklist</i> on pages 62 - 74.</p>

Signage

Comment	Response
<p>The following changes should be made to the Signage section within the Playspace Evaluation Checklist:</p> <ul style="list-style-type: none">• retract the requirement for Braille. It is a big expense and likely only larger Council's will be able to install it.• include requirements for informative signage including a list of user expectations.• recommend use of clear language and symbols.	<p>The <i>Playspace Evaluation Checklist</i> includes recommendations for playspace signage including ensuring signage is easy to read, uses simple language and graphics and has a high colour contrast.</p> <p>The <i>Playspace Evaluation Checklist</i> encourages consideration of pictographs and braille for playspaces. The checklist notes that each playspace is unique and not all playspaces will meet every criteria.</p>

Wayfinding/Layout

Comment	Response
<p>Wayfinding should be logical, connected, and leading to a location.</p> <p>Paths should include points of interest, unobstructed views between points of interest.</p>	<p>The Guideline does not intend to prescribe how a playspace is navigated nor what elements a path should include, but rather provide overall design principles for inclusive playspaces.</p>

* Page numbers referenced refer to the Guideline

Can I play?



Play Experience

Comment	Response
<p>It is important that there is diversity in play opportunities across playspaces (i.e. not all playspaces contain the same elements).</p>	<p>The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 includes recommendations for designers to consider when designing playspaces. The recommendations are a guide to assist designers in creating inclusive playspaces without stifling creativity. The recommendations enable designers to create unique and exciting inclusive playspaces.</p>
<p>Playspaces should include opportunities for inter-generational play. Social inclusion, engaging people of different ages, abilities and cognitive functions are all important features of playspace design.</p> <p>Playspaces should include quiet areas, memory games for all ages and cognitive abilities.</p>	<p>The <i>Design Principles</i> on pages 29 - 35 outline the importance and benefits of inclusive play, including creating a sense of belonging and promoting skill development. The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 and the <i>Design Principles Checklist</i> on pages 62 - 74 provide recommendations on how to include these elements within playspace design.</p>
<p>Open spaces should be retained to experience a sense of freedom.</p>	<p>The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 includes recommendations for playspace designers to consider unprogrammed spaces for imaginative play. The <i>Design Principles Checklist</i> on pages 62 - 74 includes recommendations for playspaces to be located next to informal recreation spaces including kick-about spaces for unstructured play opportunities.</p>
<p>The Guideline should include comments on water play, specifically:</p> <ul style="list-style-type: none">• Water play features to be turned off in the winter / colder months.• Recommend playspaces include free water play features as more families live in apartments and want access to water play.	<p>Maintenance of playspaces (including timing of water play) is determined by the governing authority e.g. council.</p> <p>The <i>Design Principles Checklist</i> on pages 62 - 74 includes recommendations for designers to consider when designing playspaces including the consideration of water play to stimulate the senses.</p>

* Page numbers referenced refer to the Guideline

Equipment

Comment	Response
The checklist should include requirements of sensory equipment, play equipment, exercise equipment for all ages.	The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 includes recommendations for playspace designers to consider sensory play and provide play opportunities for a range of ages, abilities and cultural backgrounds. The Guideline does not intend to prescribe the content of the playspace, but rather provide a tool to assist designers in creating inclusive playspaces.
Exercise equipment for teens, elderly, and disabled, should be installed in areas separate to the playspace.	The Guideline encourages playspace designers to consider the context in which the playspace is located. This could include considerations such as nearby exercise equipment.
Designs should separate age-appropriate playspaces / equipment where possible for safety.	Safety has been addressed in <i>Design Principles Checklist</i> on pages 62 - 74 where it recommend playspace equipment, fall zones and surfacing comply with relevant Australian Standards. The Guideline does not intend to prescribe the layout of playspaces.

Surfacing

Comment	Response
The Guideline lacks information / discussion around the different types of surfacing, colour contrasts, etc.	The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 includes recommendations for appropriate colour contrast between paths and play surfaces. The case studies on pages 36 - 43 provide visual examples of path and playspace surfacing, including how surfacing colour has been used to differentiate between activity and circulation spaces.
The Guideline needs further definition and distinction between access path surfaced and playspace surfacing.	The case studies on pages 36 - 43 provide visual examples of path and playspace surfacing. The addition of a glossary has been considered for future program promotion on the Everyone Can Play website to provide further explanation on terms.
Bark or loose floor material should not be used as softfall surfacing.	The <i>Design Principles Checklist</i> on pages 62 - 74 recommends playspace equipment, fall zones and surfacing complies with relevant Australian Standards. The Guideline does not intend to prescribe what type of softfall surfacing should be used within playspaces.

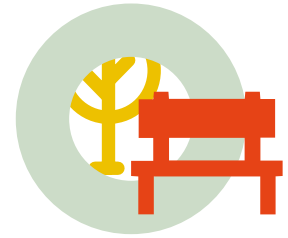
* Page numbers referenced refer to the Guideline

Surfacing (continued)

Comment	Response
<p>The Guideline should recommend there be more playspaces with AstroTurf for people with sensory issues.</p>	<p>The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 recommendations including accessible surface treatments or accessible path to the equipment's entry and exit points to enable ease of use. The <i>Design Principles Checklist</i> on pages 62 - 74 recommends playspace equipment, fall zones and surfacing complies with relevant Australian Standards. The Guideline does not intend to prescribe what type of softfall surfacing should be used within playspaces.</p>

* Page numbers referenced refer to the Guideline

Can I stay?



Equipment

Comment	Response
<p>The Guideline should revisit how it refers to fencing:</p> <ul style="list-style-type: none">• The wording needs to be reworked and care needs to be employed to ensure that enclosure of playspaces is not confused as best practice for inclusivity.• Playspaces should not be fully fenced.• More playspaces should be fenced and provide gated access. For carers and parents who care for multiple kids, there is a need to be able to safely “contain” the children in a playspace. Soft boundary fences such as hedges and rocks do not offer safety.	<p>The Guideline encourages consideration of potential hazards/ risks when designing a playspace. The Guideline recommends if there is a potential risk for the designer to consider minimising the risk through formal or informal barriers. The Collaroy Beach Playground case study on pages 36 - 37, the Westport Park Playground case study on pages 40 - 41, and both the <i>Playspace Evaluation Checklist</i> on pages 52 - 61 and the <i>Design Principles Checklist</i> on pages 62 - 74 encourage the designer to consider the context of the playspace when considering fencing.</p>

Safety

Comment	Response
<p>Paths and stairs should be slip resistant, railings should be included for stairs, paving should have a clear edge and paths should have a colour contrast to define transitions (i.e. levels, activity zones).</p>	<p>The <i>Playspace Evaluation Checklist</i> on pages 52 – 61 and the <i>Design Principles Checklist</i> on pages 62 – 74 encourage designers to consider the comfort of surfacing and ease of use for all, including those with limited mobility. The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 includes recommendations for appropriate colour contrast between paths and play surfaces. The case studies on pages 36 - 43 provide visual examples of path and playspace surfacing, including how surfacing colour has been used to differentiate between activity and circulation spaces.</p>

* Page numbers referenced refer to the Guideline

Amenities

Comment	Response
The word "Amenities" is incorrectly used ("Amenities" = toilets and changing places), and it should be changed to "Facilities" to include BBQs, parking, etc.	The word "Amenities" has been reconsidered and changed to "Facilities".
The Guideline should encourage the inclusion of changing facilities within or nearby playspaces.	The <i>Playspace Evaluation Checklist</i> on pages 52 – 61 and the <i>Design Principles Checklist</i> on pages 62 – 74 encourage designers to consider including accessible toilet/s which feature change facilities for babies, children and adults, near the playspace.

Seating

Comment	Response
Seating is an important feature in playspaces, especially seating with arms and backs.	The <i>Playspace Evaluation Checklist</i> on pages 52 – 61 and the <i>Design Principles Checklist</i> on pages 62 - 74 recommends different types of seating be considered in the design of playspaces, to achieve inclusivity in a playspace.

Water

Comment	Response
There needs to be a greater emphasis on the installation of drinking fountains in all playspaces to facilitate easy access to drinking water. The provision of public drinking water reduces the consumption of sugar sweetened drinks as well as litter.	The <i>Playspace Evaluation Checklist</i> on pages 52 – 61 and the <i>Design Principles Checklist</i> on pages 62 – 74 recommends including access to drinking fountains and encourages designers to consider the location of drinking fountains to allow ease of access for all, including those with limited mobility.

Rubbish Bins

Comment	Response
The Guideline should provide recommendations for more rubbish bins to be installed in playspaces, both for landfill and for recycling.	The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 and <i>Design Principles Checklist</i> on pages 62 – 74 recommend access to bins be considered in the design of playspaces. The Westport Park Playground case study on pages 40 - 41 provides a visual example of how a rubbish bin has successfully been incorporated within the playspace.

* Page numbers referenced refer to the Guideline

Shade

Comment	Response
Shade provision is critical, and there is little discussion in the Guideline about the provision of shade. Emphasis should also be placed on including more trees in playspaces.	The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 and the <i>Design Principles Checklist</i> 62 – 74 recommends shade be considered in the design of playspaces. The playspace case studies on pages 36 – 43 provides examples of how shade has been applied in the design of playspaces including through the use of sail shades, trees and picnic tables. The Muston Park Playspace case study on page 25 provides an example of how playspaces utilise existing trees to provide shade to the playspace.
The Cancer Council NSW supported more emphasis be placed on the vital role of shade in the prevention of skin cancer, and suggestion to include rationale and evidence supporting skin cancer prevention in the Guideline.	The Everyone Can Play Grant Program requires successful applicants within Greater Sydney to provide shade to the playspace and immediate surrounds at a rate of one tree for every \$5,000 of funding and register the trees as part of the Five Million Trees for Greater Sydney program.

Environment

Comment	Response
Natural elements should be included in playspaces. The Guideline provides an opportunity to advocate for environmental sustainability and include specifications to ensure playspaces are built away from noise and pollution, provide access to recycling bins and provide access to natural features.	The <i>Playspace Evaluation Checklist</i> on pages 52 – 61 and the <i>Design Principles Checklist</i> 62 – 74 recommends considering the landscape the playspace sits within and providing connections (e.g. visual or physical). Both checklists also recommend including sensory focused and natural elements to stimulate the senses and including bins. The Guideline does not intend to specify the type of bins. Section <i>Design</i> on page 26 recommends using the design principles within the Guideline to determine a suitable location within the park for the playspace.

General comments

Shade

Comment	Response
The Guideline should include or make reference to current Australian Standards (equipment, safety, etc).	The <i>Playspace Evaluation Checklist</i> on pages 52 - 61 and the <i>Design Principles Checklist</i> on pages 62 - 74 recommends playspace equipment, fall zones and surfacing complies with relevant Australian Standards. The addition of a resource to provide a list of all relevant Australian Standards and clarity on terms has been considered for future program promotion on the Everyone Can Play website.

Language

Comment	Response
The language is too informal, too emotive and needed to be more sophisticated. The language needs to be more concise and succinct.	<p>The Guideline provides a range information including case studies and stories from individuals who use playspaces or are involved in the design and delivery of playspaces. The Guideline is not a statutory policy document, but a tool which playspace users and designers can use to advocate for more inclusive playspaces.</p> <p>Language which reflects the nature of the Guideline has been used throughout the document.</p>

Culture

Comment	Response
The Guideline needs to directly reference Aboriginal and Torres Strait Islander cultures and link these back to the Design Principles.	The <i>Playspace Evaluation Checklist</i> on pages 52 – 61 and the <i>Design Principles Checklist</i> on pages 62 – 74, recommends designers to consider inclusivity for people with different cultural backgrounds. The Guideline does not intend to prescribe the content of the playspace by specifying groups of people to cater for, as this may limit the inclusiveness and individuality of a playspace.

References to Young People

Comment	Response
Young people have been left out of the draft Guideline, and associated promotional material. The needs of young people should be considered.	The Guideline has been reworked and provides reference to young people.

Funding

Comment	Response
<p>Grant funding is important and needed to build new playspaces, improve existing playspaces, and maintain these playspaces.</p> <p>Concerns were raised around the allocation of grant funding. Submissions note that any funding allocation will need to be transparent, equitable and competitive, with a portion of the funding to be allocated to research and development purposes.</p> <p>One submission raised concerns around the grant program assessment criteria, where a council may be penalised for having a different approach or ideas or strategic plans that may not align completely with the Guideline.</p>	The Everyone Can Play Grants Program was announced on 12 November 2018. The grants program included funding for new and renewal/upgraded playspaces. Information on the grant program including funding allocation, eligibility and assessment criteria can be found on the Everyone Can Play website.

* Page numbers referenced refer to the Guideline

Council's Park Hierarchy

Comment	Response
The draft Guideline does not demonstrate a sound understanding of the different levels of service provision to maintain the hierarchy of playspaces. There is a need to address the different levels of service provision, as not all playspaces warrant facilities such as toilets and BBQs.	The Everyone Can Play Guideline is not intended to specify the content of a playspace. The Guideline is designed to provide a general outline of how to achieve inclusivity in playspaces. Not all recommendations will suit all playspaces. The Guideline encourages playspace designers do the best with what they can, within the budget and the site constraints they are faced with.

Strategic Framework

Comment	Response
The Guideline should be embedded and/or incorporated into State policy, local strategic plans, open space strategies, Development Control Plans, etc	The <i>Strategic Planning</i> section on pages 22 -23 recommends councils review their current planning documents that are relevant to playspaces and align them with the aims and principles of the Everyone Can Play Guideline. Step 2 in the <i>Strategic Planning</i> section provides examples of the planning documents that can be put under review.

Partnerships/Linkages

Comment	Response
The Department of Planning and Environment should partner with the Planning Institute of Australia (PIA) and the Australian Institute of Landscape Architects (AILA) to include "inclusivity" and "universal design" in their awards criteria for the Play Spaces category.	Partnering with institutes such as PIA and AILA has been considered for future program promotion.
The Disability Inclusion Action Plan (DIAP) should be linked to the Guideline.	Reference to the Disability Inclusion Action Plan has been included in the Champion section on pages 47 - 49 of the Guideline.
Greater emphasis to be placed on the health benefits of active play and its contribution towards meeting Australia's Physical Activity and Sedentary Behaviour Guidelines.	The importance of inclusive play is outlined in The Importance of Inclusive Play section, on page 12 of the Guideline. The health benefits of inclusive play have been included within the Design Principles section on pages 29 - 35.

* Page numbers referenced refer to the Guideline

Expectations

Comment	Response
The Guideline may create unrealistic expectations in the community, and create a series of unnecessary challenges for councils as the Guideline tries to address too many things.	The Guideline encourages designers to do the best with what they have (i.e. budget, time, site constraints). This point is emphasised in the <i>About Everyone Can Play</i> section on page 14 where it states the intent of the Guideline is to help designers do the best with what they can, within the budget and the site constraints they are faced with. This point is further emphasised within both the introduction paragraphs of the <i>Playspace Evaluation Checklist</i> on page 52 and the <i>Design Principles Checklist</i> on page 62.
The prescriptive nature of the Guideline may inform strict adherence, which may sterilise creativity and innovative design, resulting in all playspaces becoming the same and communities losing the variety of designs.	The Guideline has been designed to provide a guide on how to implement inclusivity in playspaces. The Guideline does not specify what contents each playspace should include to ensure creativity or innovation of playspace designs is not limited. The Guideline is a toolkit to assist playspace designers to create spaces which are as inclusive as possible.
The Guideline should be restructured into sections to suit targeted audiences and address specific issues.	The Guideline is not intended to be specific, but aims to provide an overall idea on ways to consider inclusivity when designing inclusive playspaces.

Imagery/Photographs

Comment	Response
Some of the photographs used in the Guideline do not correlate to the information on the page. If the photos are used to illustrate a point, they should be in context.	Images have been reworked to ensure they correlate to the information on the applicable pages.

Role of Private Sector

Comment	Response
There is a lack of guidance on the role of the private sector. There is a need to establish a way to encourage and facilitate how the private sector can participate in the delivery of inclusive playspaces, and how collaboration can be strengthened with the private sector.	The <i>Strategic Planning</i> section on pages 22 – 23 encourages collaboration and partnership opportunities with other industries and professionals to achieve best practice inclusive decision making when planning for inclusive play.

* Page numbers referenced refer to the Guideline

Local Infrastructure Priorities

Comment	Response
Guidance on how to elevate the Guideline and its objectives to a higher priority would be good as councils have competing local infrastructure priorities.	The <i>Strategic Planning</i> section on pages 22 -23 recommends councils review their current planning documents that are relevant to playspaces and align them with the aims and principles of the Everyone Can Play Guideline. Step 2 in the <i>Strategic Planning</i> section provides examples of the planning documents that can be put under review.

Schools and Early Childhood Centres

Comment	Response
There is no mention of inclusive play in schools and early childhood centres. With children spending more waking hours in these settings, it is important that the Guideline addresses the playspaces in these settings.	The Department of Planning and Environment encourages all playspace designers (including in schools and early childhood centres) to use the Guideline to assist in the design and delivery of inclusive playspaces. The Guideline is available to download on the Everyone Can Play website.

Education

Comment	Response
More education and training should be provided by the Department, in the form of a series of practical workshops for council staff and landscape architects that provide more in-depth training on the framework.	This is a feature in the Grants Program. Workshops on the Everyone Can Play Program and Grant Program will be considered for future program promotion.

Standard Equipment

Comment	Response
Installation of wheelchair rockers, platform swings and wheelchair accessible trampolines in every inclusive playspace should be considered.	The Guideline is not intended to prescribe the contents of each playspace, but encourages designers to use the Guideline as a tool to direct their creativity in a way that provides inclusivity in NSW's playspaces.

* Page numbers referenced refer to the Guideline

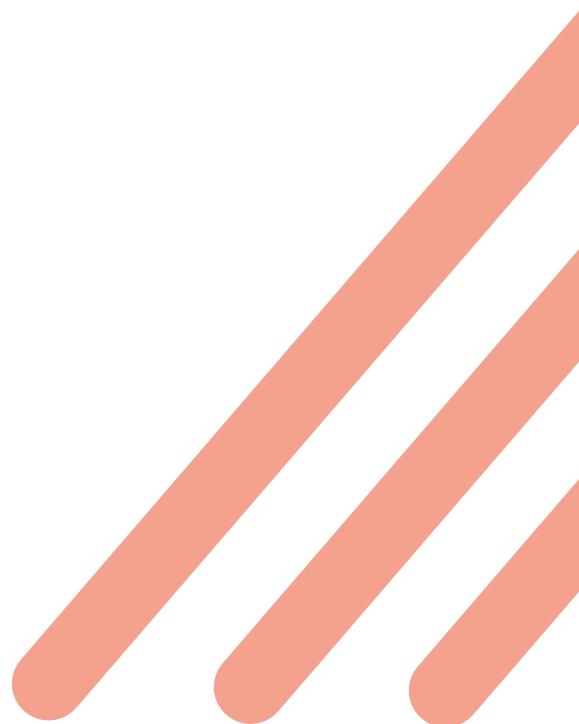
Design Community Support

Comment	Response
Support from the design community is important and should be outlined in the Guideline.	The Guideline was created and developed with the help of advisory and advocacy groups. These groups consisted of people from multiple disciplines, including people involved in design.

Other

Comment	Response
Consider the creation of a website, glossary, links to resources, literature and a list of inclusive play equipment suppliers.	The Everyone Can Play website will provide news, stories and resources to assist in the creation of inclusive playspaces. The addition of a glossary to provide explanation on terms has been considered for future program promotion on the Everyone Can Play Website.
The Guideline should recommend more playspaces for young children (0-4 age group) are constructed.	The Everyone Can Play Guideline provides an outline on creating inclusive playspaces that cater to all ages, abilities and backgrounds, it does not intend to specify the content of playspaces.
Play providers will require guidance and commentary in relation to inclusive design.	The Guideline is available for download on the Everyone Can Play website and can be referred to when needed, during the planning, design or delivery of an inclusive playspaces.

* Page numbers referenced refer to the Guideline



Thank You!

The NSW Department of Planning and Environment would like to thank all contributors who provided feedback during the consultation period and to everyone who attended the workshops.

The final Everyone Can Play Guideline will be available for download at the Everyone Can Play website www.planning.nsw.gov.au/everyonecanplay

