

Cabinet –16 September 2009

Walsall Playbuilder Programme

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|----------------------|-------------------------------------------|
| Portfolio: | Councillor Sanders, Leisure and culture |
| Service: | Leisure and Culture – Greenspace Services |
| Wards: | All wards |
| Key decision: | Yes |
| Forward plan: | Yes |

1. Summary of report

- 1.1 Walsall has been designated a Play Builder Authority and awarded a grant of £1.1 million from the Department for Children, Schools and Families (DCSF) following the submission of a detailed project plan which was a pre-requisite to the award. The plan focused on the Council's aim to overcome the deficiencies and accessibility to play spaces creating approximately 22 new or substantially refurbished fixed play spaces over a two year period. The grant offer was accepted by the Director of Children's Services during March 2009.
- 1.2 A working group has been established to manage and deliver the programme and early work has been undertaken to identify, evaluate and prioritise potential play sites. A two stage consultation programme has also been developed and implemented which will initially engage children and young seeking the views and ideas for site design and identify specific needs. Further engagement will be carried out seeking wider community views on specific play sites and design proposals.
- 1.3 Following design guidance the proposed play sites will be developed using more natural features and materials and will be a move away from traditional fixed play equipped facilities however the creation of up to 22 new play sites will have on going revenue implications. Sustainability will be a key design feature to minimise maintenance costs.
- 1.4 Conditions requiring that the funding be spent within the specific financial years allocated has determined the procurement process to ensure that all works are tendered and completed within the allocated timescales and is also a key risk factor in the delivery of the programme as a whole.

This report is intended to:

- Inform Cabinet of the Playbuilder Programme
- Obtain Cabinet Member approval of the programme and endorsement of the approach taken

- Outline the intended procurement process for the capital works of the programme and seek delegated authority to award tenders,
- Outline the governance procedures in place
- Outline the ongoing financial commitment required in terms of revenue maintenance costs and request approval to include these in the 20010/11 budget.

2. Recommendations

Cabinet is asked to:

- (i) Approve the Walsall Playbuilder Programme (2009-11) and endorse the approach being taken to deliver new play spaces across the Borough in accordance with guidance set out by Play England in their 'Designing for Play: Creating successful play spaces' 2008 strategy and the Playbuilder Programme's aim to overcome areas of play deficiency for children and young people living in the Borough as set out in the Council's Play Strategy 'Live for Play, Play to Live' 2007.
- (ii) Approve in accordance Finance and Contract Rule 13.9.2 delegated authority to the Executive Director for Neighbourhood Services to award tenders for the works required to deliver the Playbuilder programme.
- (iii) Note and approve the inclusion of ongoing revenue costs in the region of £113k within the 2010/11 plus budget.

3. Background information

- 3.1 At Cabinet November 2006 the Green Space Strategy for Walsall's parks and green spaces was approved. The strategy was the culmination of a considerable amount of research and community consultation. The production of the strategy represented a milestone for the strategic delivery of the service setting the scene for the management and development of green spaces for the five year period of the plan (2006–11) and recognised the importance green space played in the Council's regeneration framework and its contribution to the health and well being of the community.
- 3.2 The strategy recognised that there was considerable variation in the distribution of children's play facilities throughout the Borough and that there were significant areas of the Borough that do not have access to children's play provision at all. This applied to approximately three quarters of the residential households. Respondents of the residential household survey undertaken in the formulation strategy considered that there was insufficient provision for children and young people. This was identified as one of the top four concerns. In view of this a key action arising from the strategy and service objective is to provide equipped play areas across the Borough on parks and other green spaces that are safe and accessible to all.

- 3.3 During 2007 the Green Space Service led on the development of Walsall's Play Strategy 'Live for Play, Play for Life' which was approved by the Cabinet in September 2007. This strategy was the first of its kind in Walsall and formed the basis of a successful £715,000 application to the Big Lottery Fund Children's Play Programme. The strategy outlined a three year action plan which began on the 1 of June 2008. The delivery of the action plan is being led by the Green Space Service in partnership with Children's Services and includes the procurement of a mobile truck and climbing frame, installation of truck stops at key green spaces and community sites throughout the Borough and the refurbishment of two fixed play areas within two of the premier parks (Willenhall Memorial Park and King George V Playing Fields). The deficiency and lack of accessible children's play provision concluded in the Green Space Strategy was also identified and reflected in Walsall Play Strategy. Under Strand Four of the action plan it was agreed to undertake action during 2009-10 towards the continued improvement of local fixed play and young persons' facilities as identified at appropriate locations and at potential new sites.
- 3.4 The Government's "Children's' Plan" highlighted the importance of play and better play environments particularly in tackling childhood obesity and supporting child health and wellbeing. It was recognised that local authorities play a key role towards this agenda in delivering safe and sustainable play areas. Stemming from the Children's Plan, the Department of Children, Schools and Families (DCSF), under the Pathfinder and Playbuilder programmes, has awarded the members of the Black Country Play Partnership (which includes Wolverhampton, Dudley, Sandwell and Walsall) funding to create additional play spaces and environments in accordance with new design guidance ('Designing for Play: Creating successful play spaces' 2008) being overseen and administered by Play England. The guide sets out design principles for creating high quality play spaces, which can be affordably maintained, which give children and young people the freedom to play creatively, and yet still allow them to experience risk, challenge and excitement. This suggests a move away from traditional fixed play equipped facilities. Each play area will be different and designed in relation to its location and local need. Use will be made of natural elements such as mounds and tunnels, offer a range of play experiences and will be accessible to children of differing ages and abilities.
- 3.5. Walsall has been designated a Playbuilder Authority and has been awarded a grant of £1.1million following the submission of a detailed project plan. The project plan set out the Council's aim to overcome the deficiencies and accessibility to play spaces as identified through the development of the two guiding strategies, and thus creates approximately 22 new or substantially refurbished fixed play spaces for children aged between 8 and 13. The funding is required to be spent between 2009/10 – 2010/11 and it is likely that there will be a requirement to deliver a minimum number of play space opportunities / improvements in 2009/10 (namely 11-12 new play spaces). The decision of the DCSF to allocate funding has been based on their own guidance and how Walsall Council is considered to be able to deliver against the Playbuilder project plan to achieve the outcomes set out in its adopted Green Space Strategy and the Play Strategy. The project plan was a pre-requisite of the Playbuilder award and its primary focus was on providing new play areas in those areas recognised as play deficient. Walsall's Playbuilder Programme will be complementary to the

Children's Play Fund Project and intrinsically linked to the delivery of Walsall's Play Strategy.

- 3.6 The overall programme and the work of the Playbuilder working group (see paragraph 4.3.1) will be governed by the recently re-established Walsall Play Partnership who held its first meeting on 28 July 2009. A play partnership of this nature is deemed to be good working practice by Play England and they are very encouraging of the role that Walsall's partnership may have in the delivery of the Play Strategy agenda and overall Children and Young Peoples Plan 2009-10 to 2011-12. The Play Partnership will report to the CHEG - Children's Trust Board and will ensure that all partner agencies for children are engaged and have full ownership of the programme and its outcomes. The CHEG board agrees all projects that benefit young people in Walsall and includes a range of internal Council and external partners such as NHS Walsall and Education Walsall (who delivers Walsall's education services). The membership of the Walsall Play Partnership has therefore aimed to be reflective of the CHEG board membership. The Children's Trust Board approved the Playbuilder project plan and the Playbuilder application at their meeting on 25 February 2009.
- 3.7 The Council was granted its Playbuilder Programme allocation in March 2009 and therefore in anticipation of the grant being awarded and in order to achieve the necessary head start in the implementation of the programme during 2009/10, the Playbuilder Working Group was established and began a process of formulating the evaluation criteria that would assist in the rationalisation and selection of sites from a list in excess of thirty locations. The evaluation used a weighting system to assess the suitability of the individual sites and prioritise them identifying those proposed to be established in the first year and second years of the programme. As a result of the evaluation process a number of potential sites were reduced to 26 sites. The criteria used to evaluate the sites can be found within **Appendix A**.
- 3.8 On 2 July 2009 a letter was sent to forty eight elected members in whose wards there were proposed new play spaces within the Playbuilder Programme. The letter explained in detail the Playbuilder Programme and identified the proposed play area locations in their particular wards. Councillors were invited to present their views and suggest alternative sites by 10 July 2009. Three responses were received concerning specific site details and which are now being considered within the programme using the same evaluation criteria. The information provided by members has been helpful in obtaining the local knowledge of sites and may pre-empt some community comments when the site selection and design proposals are taken out to wider community consultation (see paragraph 10). The proposed sites are detailed in **Appendix B**.

4. Resource considerations

- 4.1 **Financial:** The grant offer from the DCSF was made to the Council's Children's Services and was accepted by the Director of Children's Services on 18 March 2009. Under the terms of the grant funding has to be spent between the financial years 2009/10 and 2010/11 with specific funding allocated to each financial year. This has been the key factor in determining the procurement process for the programme to ensure that all works are tendered and completed within the

allocated timescales. The total grant awarded is £1,176,993 of which £1,131,098 is capital and £45,895 revenue. This funding has been divided by the DCSF between two financial years as set out below.

| | |
|----------------|--------------------|
| Year 1 2009/10 | £531,729 (Capital) |
| | £27,537 (Revenue) |
| Year 2 2010/11 | £599,369 (Capital) |
| | £18,358 (Revenue) |

The capital grant will be utilised to commission the physical works on site and contribute towards professional fees and consultation costs associated with the development of designs and implementation of works. The revenue funding will be used to provide assistance to project management fees and other staffing costs associated with the delivery of the programme. Whilst no other Council capital resources will be required to deliver the programme, other alternative external funding sources are being identified to help provide additional resources at individual sites where it may be possible to bring additional benefits. The capital budget available within the programme is finite and will need to be distributed amongst the approximate 22 beneficiary sites; as such the emphasis on natural play over fixed pieces of equipment will be a priority for the design of each play space as this will enable more improvements to be undertaken at lesser cost.

The creation of up to 22 new play areas will have on-going revenue implications associated with the repair and maintenance of play equipment, surfacing, barriers and other play features. A key consideration of the design of each individual play area will therefore be sustainability and reducing future maintenance implications. Existing maintenance budgets set aside for the repair, maintenance and improvement of children's fixed play areas is already limited and has been reduced over the past few years as a result of successive efficiency exercises. Existing budgets are not sufficient to meet existing maintenance requirements. The additional annual revenue implication will be in the region of £113k. It is anticipated that year 1 costs may be lower than this, however this cannot be guaranteed. The costs are not currently included within the councils financial planning outlook, therefore should cabinet approve the programme, then an ongoing financial commitment of c£113k will need to be built into the 2010/11 plus budget.

- 4.2 Legal:** The Council's legal and procurement teams were invited to be members of the Playbuilder working group and have therefore been able to provide all necessary advice to inform the procurement process and interpretation of the grant conditions. They have provided guidance on the interpretation of European Tendering and the Council's Financial & Contract Rules (FCRs) and an agreed procurement model has been developed. This procurement model in the first instance will see the individual sites being packaged into separate contracts consisting of four sites and a programme of tendering these schemes will commence in November 2009. The rationale for the packaging of sites in to separate contracts and tendering these as a rolling programme from November 2009 onwards was based upon the need to have spent 95% of the year 1 grant by March 2010. It was considered that to ask the design team to prepare detailed designs and tender documentation and then to seek a single contractor to deliver

eleven year 1 sites could mean that works would not be completed by March 2010 resulting in a potential claw back of grant.

The above procurement model assumes that contractors from the Council's select list will be invited to tender for these works (in accordance with the FCRs) and due to time pressures in the first instance this is likely to be the preferred procurement method, however a second procurement model is being evaluated following Senior Management and Members engagement in the Groundwork Black Country scheme. Further information on the benefits brought through the scheme are found in paragraph 5 but in the instance of the Playbuilder Programme it may look towards the Wolverhampton Pathfinder Programme where Groundwork's partnership with Wolverhampton City Council (CC) has delivered new play spaces through the work undertaken by the young people on the scheme. We are now in discussions with Groundwork Black Country and Wolverhampton CC to understand how their experience can be used and transferred into a potential procurement model for Walsall's Playbuilder programme year 2. This procurement model will be subject to a future Cabinet report.

- 4.3 Staffing:** The DCSF funding has been awarded to Walsall's Children's Services however a local arrangement has been agreed whereby the Playbuilder programme will be managed and delivered through Leisure, Culture and Lifelong Learning. As a clear line of reporting has been established to ensure that there is robust governance procedures are in place that oversee and advise the delivery partner. The Walsall Play Partnership with a direct reporting line to Children's Services Strategic Leadership Team and the CHEG within the Trust Board will therefore guide the project. Day-to-day implementation of the programme will be progressed through a working group which brings together a range of partnership agencies to ensure delivery at a working level. Membership of the Working Group includes the lead project manager, Head of Green Spaces, Green Space Improvements officers, Children's Trust Strategic Manager, Regeneration Landscape Design and Development Officers and representative from the authority's procurement team. It is also attended by a representative from Play England. The Playbuilder programme governance reporting lines are shown at **Appendix C**.

5. Citizen impact

- 5.1** Whilst there is a reasonable distribution of children's play provision across the Borough there are significant areas that do not have access to outdoor Children's Play provision when applying a buffer based on the guidance in the National Playing Fields Association standard. On a Borough wide level nearly 78% of residential households have no access to children's play provision based on an approximation of five minutes walking time. The project proposes to develop up to 22 new or substantially refurbished children's play area facilities in identified areas throughout the Borough which are deficient in play provision. This will considerably improve all children's unrestricted access to play contributing to their health, mental and social wellbeing. The design consultation process will ensure engagement with a number of stakeholder forums.

- 5.2 The procurement model that would seek to engage the Groundwork Black Country service may have a direct impact on young people from within the Borough. Currently of all the Black Country authority areas, Walsall has no young people participating in the programme. This innovative approach to the implementation of physical works on site utilises local young people who engage on a six month training programme to learn basic construction skills leading to vocational qualifications. The young people are identified for participation on the scheme through their schools, training providers or come forward as referrals from other organisations such as Connections as young people who are not successfully engaging in mainstream schooling and who without support may become another young person Not in Education, Employment or Training (NEET). This procurement model could offer real opportunities for young people in the Borough and would hopefully lead to other Council projects being delivered in a similar way if this model proved to be successful- helping to contribute to the Council's worklessness agenda.

6. Community safety

The engagement of children and young people is essential in not only seeking their opinions on the programme but also to engage them in creating the play spaces as a means of installing a sense of ownership in the facilities to reduce the level and incidences of potential vandalism. All sites will be designed to encourage natural surveillance and where materials are used they will be of a robust standard to 'stand up' to any damage. Site surveillance, accessibility and crime data have all formed part of the evaluation criteria as a way of weighting whether a site has good natural surveillance, good accessibility or has known serious problems with anti-social behaviour leading to a site scoring a lesser score.

7. Environmental impact

The creation of new play spaces on under utilised green spaces across the borough will enhance the visual appearance and raise the recreational value of these sites. The sites will be designed to a high standard with material and equipment choices been selected to improve the overall environmental quality of the green spaces sites. Also by addressing the deficiencies that exist around children and young people's access to play spaces, we are creating new play spaces within local neighbourhoods helping to reduce the distance travelled (by private car) to access such facilities.

8. Performance and risk management issues

The programme will be managed and monitored through the Walsall Project Approach enabling a full risk assessment and management plan to be developed. The project will be subject to monthly review that will be undertaken by both the Children's Services Strategic Leadership Team and the Neighbourhood Services Directorate performance board arrangements. An initial risk assessment has been undertaken and current risk to the project include

Risk 1: Funding is not spent within the financial years allocated leading to grant claw back and failure to deliver the scheme on sites. The procurement model outlined in paragraph 4.2 has been developed as a means of ensuring that the year 1 schemes can be delivered within the March 2010 deadline; this provides the ability to tender 'packages' of sites as and when consultation has been completed and detailed designs produced, and thus allowing us to award contracts as early as December 2009 to allow spend to be achieved on some sites as early as possible within the new calendar year. In the case of year 2, consultation will commence earlier in the year than it has been scheduled in year 1 enabling the whole programme to be brought forward and thus minimising any loss of grant in year 2.

Risk 2: Site selection and play spaces designs are not agreed by all stakeholders leading to delays in the delivery of the programme. As can be seen in paragraph 10 a detailed consultation methodology has been developed by the Playbuilder working group and endorsed by the Play Partnership Board. The consultation due to be undertaken will minimise the risk that stakeholders fail to agree the sites selected in years 1 and 2. The evaluation of sites (as detailed in paragraph 3.7) whilst initially undertaken by the working group will finally be agreed following the outcome of the community consultation and will only be decided once the Play Partnership Board have endorsed the process. Further to this where we have highlighted sites that might be delivered in year 1, if consultation should identify potential issues we will look to bring forward sites within year 2 that have greater potential to be delivered in the timescales available within year 1, and then look to undertake greater feasibility work around any sites placed into year 2.

9. Equality implications

The design of the individual play spaces will be tailored to individual local need, differing ages groups and cater for children with differing abilities and disabilities. A range of stakeholder focus groups will be consulted with as a means of ensuring that the considerations of possible minority groups in the borough are incorporated in to the selection and design of sites. These focus groups include Walsall Disability Forum and Youth Opinions Unite (both their BME groups plus Disability Young People's forum).

10. Consultation

- 10.1 The Playbuilder working group and Play Partnership Board have devised a consultation methodology for year 1 of the programme that importantly involves the engagement of children and young people but that will also take into consider the views of community stakeholders and local residents. Following completion a review will be undertaken and any lessons learnt used to improve the methodology for year 2.
- 10.2 A programme of consultation events has been set up for Summer 2009, which will involve using the Community Playbus visiting ten parks around the borough and engaging with young people to collect initial ideas for the design of the play spaces and secondly for the groups to make the design team aware of any

specific needs from their play space experience. (At this stage the consultation will not be site specific allowing greater time for the selection of year 1 sites). The focus groups are also currently being arranged; their aim will be seek the views and experiences of BME groups on play and play spaces.

- 10.3 After the initial stages of consultation with children and young people, further engagement will be carried out through the use of the First Stop Express information bus (and other community venues) that will seek the views of the wider community on the specific play sites and initial design proposals. At the same time the Local Neighbourhood Partnerships will be informed of the programmes progress site selection and designs. Staff with consultation expertise from the Walsall Children's Trust are also involved in supporting the delivery of the consultation methodology as a means of ensuring that the engagement of young people meets with the charter as set out in the Children and Young People's Plan where it states the Council's commitment to engaging with this sector of the community.

Background papers

Walsall Council Greenspace Strategy 2006 – 2011
Walsall Play Strategy Live to Play, Play to Live 2007
Appendix A

Author

Graham Hood

Head of Greenspaces

☎ 650340

✉ hoodg@walsall.gov.uk

Jamie Morris
Executive Director



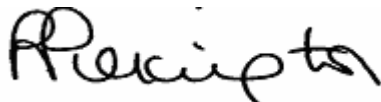
4 September 2009

Councillor Barry Sanders
Portfolio holder



4 September 2009

Pauline Pilkington
Executive Director



7 September 2009

Playbuilder Site Assessment Criteria

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|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| A. Surveillance - effects of fences, vegetation obscuring views into site, directness of sight lines into or across the site, shape of site boundaries which could reduce surveillance of some areas, level of existing use and lighting |
| B. Other Social Safety Issues - includes evidence of antisocial behaviour – graffiti, vandalism, crime reports and dog control issues |
| C. Accessibility - includes availability and ease of parking, busyness of roads and topography into and across the site affecting disabled access or the need for ramps etc. |
| D. Size - Adequacy of the size of the site or area allowing for buffering |
| E. Landscape - includes aspect/ orientation of the site to N,S,E,W; shelter, variation in topography, degree of enclosure, views from or within the site, natural features and the play value of the site |
| F. Ground Conditions - includes drainage issues (including slope, rainwater infiltration, soil type), brownfield issues, contamination issues and services issues |
| G. Equable Distribution and Evidence of Need - includes demographic of the locale and proximity of nearest play site or identification of gaps in play provision |
| H. Legal Issues - includes issues of ownership and planning requirements |
| J. Delivery - includes issues of procurement and ease of construction |
| K. Sustainability & Engagement - This includes issues of management (including maintenance of a functional facility) or community involvement (through friends groups, volunteers, other partnerships or staffing options) |

APPENDIX B

| YEAR ONE PROPOSED SITES | | | | | | | |
|--------------------------------|-------------------------------------------|-----------------|------------------|------------------------|-----------------|-----------------|----------------|
| Ref. No. | Site | Area | Ownership | Status | Proposal | Designer | COMMENT |
| 1 | Tyne Close | Brownhills West | Council | Grassed area | Play Area | | |
| 3 | White Horse Road | Newtown | Council | Grassed area | Play Area | | |
| 4 | Foley Road East, land west of CA car park | Streetly | Leased to CA? | Grassed area | Play Area | | |
| 8 | Anson Road | Bentley | Council | Former play site | Play Area | | |
| 12 | Poplar Avenue, off Rowlands Close | Bentley | Council | Existing old play site | Play Area | | |
| 23 | Sneyd Lane site opposite Appleby Gardens | New Invention | Council | Grassed area | Play Area | | |
| 26 | William Street | Butts | ? | Former NHO | Play Area | | |
| 28 | Dovedale Avenue | Willenhall | ? | Grassed site | Play Area | | |
| 30 | Druid's Walk | Walsall Wood | Council | Former play site | Play Area | | |
| 31 | Greaves Crescent | Willenhall | Council | Former play site | Play Area | | |
| 34 | Croft Street, Birchills | | Council | | | | |

| YEAR TWO PROPOSED SITES | | | | | | | |
|-------------------------|------------------------------------------------------|------------|-----------|---------------------------|-----------|----------|---------|
| Ref. No. | Site | Area | Ownership | Status | Proposal | Designer | COMMENT |
| 5 | Delves Common, south side Bell Lane, opposite school | Delves | Council | Grassed area | Play Area | | |
| 6 | Fullbrook , east side of West Bromwich Rd | Delves | ? | (old nursery School site) | Play Area | | |
| 7 | Cook Street | Darlaston | Council | Former play site | Play Area | | |
| 9 | Villiers Street | Willenhall | Council | Former play site | Play Area | | |
| 10 | Slater Street | Willenhall | ? | Grassed area | Play Area | | |
| 11 | Adj.Brackendale shops, Stroud Ave | Furzebank | ? | Grassed area | Play Area | | |
| 13 | Lister Close | Beechdale | BCHA | Former play site | Play Area | | |

| | | | | | | | |
|------------------|--------------------------------------|---------------------|----------|------------------------|-----------|--|--|
| 15 | Sneyd Hall Road | Dudley Fields | ? | Grassed area | Play Area | | |
| 16 | Oak Crescent | North Walsall | Council | Grassed Area | Play Area | | |
| Substitute 17 | Sunningdale Way | Bloxwich North | Council? | Grassed area | Play Area | | |
| 22 | Odell Road, off Odell Way | Leamore | Council | Grassed area | Play Area | | |
| 27 | Paddock Estate | Walsall | Watmos | Old play site | Play Area | | |
| 32 | Gorway Keeble Grove | Walsall | ? | Grassed site | Play Area | | |
| 21 | Westgate Chatsworth Crescent | Rushall | Council | Existing old play site | Play Area | | |
| 22 | Odell Road, off Odell Way | Leamore | Council | Grassed area | Play Area | | |
| 35 | Collingwood Centre Collingwood Drive | Pheasey and Paddock | Council | Grassed area | Play Area | | |

| POTENTIAL SITES REMOVED FROM THE PROGRAMME | | | | | | | |
|--------------------------------------------|----------------------------------------------------|----------------|-----------|-------------------------------|-----------|---------------|---------|
| Ref. No. | Site | Area | Ownership | Status | Proposal | CAD base plan | COMMENT |
| 2 | Lindon Road | Brownhills | ? | Grassed area | Play Area | yes | |
| 14 | Abbey (next to Abbey School), Glastonbury Crescent | Mossley | ? | Grassed area | Play Area | yes | |
| 17 | Turnberry Rd, | Bloxwich North | Council | Grassed area | Play Area | yes | |
| 18 | Harvesters Road | Manor Farm | ? | Former Play Site | Play Area | yes | |
| 19 | Thames Road | Blakenall | WHG? | Grassed area | Play Area | yes | |
| 20 | Heath End, Norton Rd Grove | Pelsall | Council | Grassed area | Play Area | yes | |
| 23 | Allen's Rough (Dorchester Rd/Hilton Rd?) | New Invention | Council | Grassed area on old pit mound | Play Area | yes | |
| 24 | Moreton Avenue | Pheasey | Council | Former play site | Play Area | | |
| 25 | Town Wharf | Walsall | ? | New development | Play Area | yes | |
| 29 | Whetstone Field | Aldridge | School | Playing Field | Play Area | | |
| 33 | Haley Street | Willenhall | Council | Former play site | Play Area | yes | |

PLAY BUILDER PROGRAMME
GOVERNANCE REPORTING LINES

