



19 February 2021

National Planning Framework 4: Position Statement

Children in Scotland

Giving all children in Scotland an equal chance to flourish is at the heart of everything we do.

By bringing together a network of people working with and for children, alongside children and young people themselves, we offer a broad, balanced, and independent voice. We create solutions, provide support, and develop positive change across all areas affecting children in Scotland.

We do this by listening, gathering evidence, and applying and sharing our learning, while always working to uphold children's rights. Our range of knowledge and expertise means we can provide trusted support on issues as diverse as the people we work with and the varied lives of children and families in Scotland.

Children in Scotland is increasingly taking a place-based approach to our work and recognise the importance of planning in ensuring that the places where children and young people grow up meet their needs. Our response is informed by our recent Health Inequalities: Participative Research project and our Manifesto for the 2021 Scottish Parliament election. It is also informed by our involvement in the Scottish Alliance for People and Places.

Our response to the Scottish Government's position statement on the National Planning Framework 4 will highlight areas in the position statement that we see as strengths as well as parts where improvements could be made. We have provided comment on some of the policy proposals made within the statement that we would support being brought forward. However, it is also worth noting that we have not commented on every policy proposal as we do not have the expertise in all policy areas covered.

In general, we believe that the position statement is aiming in the right direction and would support the development of a more people focussed planning system. However, it is clear that the position statement and the National Planning Framework

4 need to be backed up with tangible action and in particular funding to support policy to achieve meaningful change.

We also believe that the position statement would be strengthened by making more explicit reference to how people, in particular children and young people, will be supported to engage with planning process and to ensure that their needs are prioritised over those of developers and planners.

1. Do you agree with our current thinking on planning for net-zero emissions?

Children in Scotland is supportive of the Scottish Government's planning for net-zero emissions. We have called on all political parties to pursue net-zero emissions by 2045 in our 2021 Scottish Parliament election Manifesto¹. We are also aware of the importance that children and young people themselves place on tackling climate change.

'I have been striking from school every Friday morning for the last 61 weeks. The strikes are important because they are more radical than normal protests or rallies, mass civil disobedience is what we need right now. The strikes also approach the environmental crisis from a different perspective: those of children and the fact that our futures are being stolen. For a long time it was the same people with the same messages, but now the conversation has changed, largely because of the school climate strikes.' (Holly Gillibrand, Youth Climate Striker, Children in Scotland Magazine, April 2020)²

Friends of the Earth Scotland recently highlighted the need for urgency in tackling climate change in Scotland, suggesting that current activity will not be enough to make progress towards net-zero³.

It is beyond our expertise to conclude whether or not all the activity outlined in this section is appropriate and ambitious enough to achieve this goal. However, we are pleased to see that tackling the climate crisis will be central to future planning decisions and welcome the priority given to achieving net-zero within the position statement for the National Planning Framework 4.

This commitment must be considered as one part of a systemic change in climate and environment policy to make meaningful progress towards net-zero emissions. While planning has a key role to play in reducing emissions, it is only one area where action is required. Clearly making meaningful progress towards net-zero will also require change to wider economic, trade and investment policies.

Active Travel

It is positive that the position statement makes reference to the National Transport Strategy and in particular highlights the importance of active travel. Encouraging more sustainable methods of transport will be important in reducing emissions and

¹ https://childreninscotland.org.uk/wp-content/uploads/2020/12/Manifesto-2021-26-V2_Spreads.pdf

² <https://edition.pagesuite.com/html5/reader/production/default.aspx?pubname=&edid=6ac7bece-59e8-4731-8142-6338df6ab79e>

³ <https://www.bbc.co.uk/news/uk-scotland-scotland-politics-55966625>

active travel is a key part of this. The planning system has an important role to play in encouraging/incentivising people to take part in active travel.

Children in Scotland recently delivered the Changing Gears project with Cycling Scotland to explore children's views of road safety and active travel⁴. The project provided a range of evidence about the steps required to support children and young people to engage in active travel more frequently⁵. They highlighted that safety was a key barrier for them in participating in cycling and suggested that having cycle specific paths that are separate from cars would make them more likely to take part in cycling. Children also wanted opportunities to cycle side-by-side with friends and family to make cycling more fun and feel safer. Making provision for cycle specific paths in all communities across Scotland will be key if we wish to increase participation in active travel among children.

However, we are also aware that promoting cycling on its own does not necessarily take account of some of the wider barriers to participating in cycling, particularly cost. While financial barriers to participation in cycling sit outside the planning system, a joined approach to active travel means taking account of these barriers and ensuring government works to remove them.

If the National Planning Framework 4 is serious about increasing participation in active travel, we also believe that work needs to be done to disincentivise car use, particularly around the areas where children and young people are likely to be. It is worth considering how the National Planning Framework 4 can support improved air quality in these locations. In our 2021 Scottish Parliament manifesto we have called for the introduction of an air quality monitoring scheme in locations such as schools. Using the planning system to reduce access for non-essential cars around schools would be a potential route to support better air quality.

Technology and STEM

Children in Scotland welcomes the recognition within the position statement of the need to support children and young people to develop knowledge and skills in Science, Technology, Engineering and Maths. Supporting planning for net-zero will require development of new skills and knowledge for the labour market, and it is important that these are fostered through the Scottish education system.

We are aware that Young Scot are currently working with the Scottish Government on the Youth Guarantee which aims to make sure that all young people between 16-24 are in employment, education, volunteering or an apprenticeship⁶. It would be worth considering how development of skills and knowledge needed to support the aim of planning for net-zero can be embedded within the Youth Guarantee.

Specific Policy Proposals

⁴ <https://childreninscotland.org.uk/cycling-scotland/>

⁵ Report due to be published in Spring 2021.

⁶ <https://youngscot.net/news-database/ypguarantee#:~:text=The%20aim%20of%20the%20Guarantee,an%20apprenticeship%20or%20training%20programme>

Many of the specific policy proposals suggested in the document sit outside of Children in Scotland's remit. However, we wished to highlight areas where we agreed with proposals or that we felt should be prioritised or specific policies that we think should be brought forward.

We agree that Scottish Government should prioritise reusing buildings rather than starting developments from scratch. We would also support making it more difficult for developments with high emissions to be granted planning permission.

As we have already highlighted, we would like to see a firmer commitment to the development of cycle paths that are kept separate from roads used by cars. We know from our work with children and young people that these measures are essential to support them to get more involved in active travel.

It would also be worth considering how additional measures on top of the planned introduction of free bus travel for under 19s could be expanded to other aspects of public transport.

2. Do you agree with our current thinking on planning for resilient communities?

Children in Scotland is broadly supportive of the thinking on planning for resilient communities. Much of the proposal is inline with our organisational priorities and provides a positive direction for supporting communities to have access to the resources that they need.

In this section, we have suggested additions to the position statement that would compliment proposals and have identified areas where specific focus and attention could be give to the needs of children and young people.

Tackling Inequalities

We are pleased that the that position statement makes explicit reference to the inequalities between different communities and references how place affects the life experiences of children and young people. It is vital that all future work to plan for resilient communities understands the fact that these inequalities are a product of decision-making. Support from government and wider public bodies is required to ensure that they are tackled.

In 2020 we published the final report for our Health Inequalities: Participative Research project⁷. During the project we supported 15 young peer researchers living in areas of deprivation to explore how their neighbourhoods could impact on children and young people's health, wellbeing and contribute to inequalities.

Through the project the young researchers identified that local parks and green space were often not kept in good repair and felt unsafe⁸. We were pleased that the position statement made a clear reference to the links between play and green space. Our research suggests that in some areas of deprivation these green spaces are not viable areas for play. It is important that good quality, safe green spaces are

⁷ <https://childreninscotland.org.uk/health-inequalities-participative-research-project/>

⁸ <https://childreninscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

prioritised to ensure all children and young people can experience the benefits of outdoor play.

The young peer researchers also identified a high density of fast-food restaurants in their communities with few healthier options; these findings back up previous research into health inequalities⁹¹⁰. They articulated how this food environment affects their choices and perceptions of healthy food. It is clear that sustained efforts are required by the planning system to restrict the numbers of fast-food restaurants, particularly around schools or other areas where children and young people are likely to be. Tackling this should be prioritised as Scottish Government tries to deliver its strategy.

Furthermore, the young researchers also found many examples of vacant and derelict land in their local communities¹¹. They articulated how this could affect where they wanted to go and how they felt about where they lived. They also felt the land could be put to better use. We know from the work of the Vacant and Derelict Land Commission that this issue is more common in areas of deprivation and we firmly believe addressing vacant and derelict land should be a priority for planning going forward in order to promote positive outcomes for children and young people.

20 Minute Neighbourhoods

We believe a 20-minute neighbourhood approach could support the planning system to tackle the issues identified above and ensure the resources children and young people need to support their health and wellbeing are available to them in the areas that they live. In our 2021 Scottish Parliament election manifesto, we have called for consideration to be given to the UNICEF Child Friendly Cities Model¹². The approach aims to ensure that children and young peoples needs are at the heart of local decision-making and planning. This approach should be used to frame all thinking on 20-minute neighbourhoods, to ensure that the needs of children, young people and families are met.

It is also important that work on placemaking and building resilient communities does not just focus on the built environment and the planning system. Our Health Inequalities: Participative Research project identified that there were other factors that discouraged children and young people from feeling safe and belonging¹³. They told us about the negative impact of crime, substance misuse and littering on them and what they felt able to do in their neighbourhoods. This included for example, not feeling able to have friends to visit. It is important that all work that is focussed on building resilient communities does not only focus on the built environment. Planning must be linked with other policy directives including tackling addiction and substance misuse, reducing litter, and providing local services to provide alternative activities.

⁹ <https://childrenscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

¹⁰ <https://pubmed.ncbi.nlm.nih.gov/16242594/>

¹¹ <https://childrenscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

¹² https://childrenscotland.org.uk/wp-content/uploads/2020/12/Manifesto-2021-26-V2_Spreads.pdf

¹³ <https://childrenscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

Engagement in decision making.

We are pleased to see that there is referenced to engaging communities and people in decisions about planning locally. The duty to engage with local communities as part of the development of local place plans must be prioritised going forward. This means providing resource to support engagement and ensuring that practitioners who are skilled in engaging with communities are available to facilitate this work.

We are aware of some projects to engage children and young people in local planning, however as we go forward this must be fully embedded within the development of local place plans. Indeed, the Planning (Scotland) Act 2019 places a duty on planning authorities to ensure that children and young people are involved in the development of local place plans. This is particularly important as Scotland continues to progress towards incorporation of the United Nations Convention on the Rights of the Child (UNCRC). Article 12 of the convention articulates that children and young people have a right to be heard in decisions that affect them, this includes local decision-making processes such as local place plans.

We have provided further comments against question 5 which lay out specific projects and resources that could support Scottish Government and Planning Authorities to ensure they are supporting meaningful engagement in planning processes.

Other comments

We are pleased to see a broad and intersectional approach to the National Planning Framework position statement. Different demographics will have specific needs within their communities and it is important that all work to support more resilient communities takes account of this. It is important that the views of a variety of groups are actively sought within the engagement processes and that this work is conducted sensitively and appropriately. We know from our work with more seldom heard voices that it is important to work with organisations embedded within these communities who are fully aware of their background and needs.

We are also pleased to see reference to other key policy areas including Housing 2040. Children in Scotland responded to the previous Scottish Government consultation on the Housing 2040 strategy, highlighting that a rights-based approach to housing is required, that it should be affordable to all and should be situated in communities that meet peoples holistic needs¹⁴. The planning system will be particularly important for ensuring that high quality sustainable housing is provided, but also that this is set within a community where people have access to the resources and amenities they need to live.

As we have outlined previously in this submission, we are pleased to see commitment to providing sustainable travel opportunities within communities.

¹⁴ https://childreninScotland.org.uk/wp-content/uploads/2020/03/Housing2040_Final.pdf

However, as we have highlighted, it is important that work is done to tackle some of the key barriers to children and young people participating in active travel.

Specific Policy Proposals

Children in Scotland is supportive of many of the proposed policies under the building resilient community's theme.

As we have highlighted, we are supportive of a 20-minute neighbourhood's approach. We believe that this should fully incorporate the UNICEF Child Friendly Cities approach to ensure that it is prioritising the needs of children, young people, and families.

We would support an overarching policy that puts health and wellbeing at the heart of planning processes. Careful consideration will need to be given to how this actively becomes the central focus and to ensure positive words are translated into meaningful action. As we will comment on in more detail, Children in Scotland is a key partner in a project exploring the wellbeing economy. This project may provide guidance on how to put wellbeing at the heart of planning.

We would support specific guidance on what types of infrastructure should be developed in places. We would also support moves towards tighter regulation rather than just guidance that would actively restrict development of particular types of infrastructure. As we have highlighted, we would like to see the number of fast-food restaurants restricted in local communities. In our 2021 Scottish Parliament election manifesto, we have also called for tighter restrictions on the presence of off-licences and gambling shops¹⁵.

We would also support proposals to ensure that there are appropriate play spaces within all communities.

3. Do you agree with our current thinking on planning for a wellbeing economy?

Children in Scotland is very supportive of placing a wellbeing economy at the centre of the National Planning Framework position statement. We are a key partner in the Children's Wellbeing Budget for Scotland project being led by Katherine Trebeck¹⁶. We have also called on all political parties to pursue a wellbeing budget in our 2021 Scottish Parliament Manifesto¹⁷.

However, we are concerned that some language within the position statement articulates a wellbeing economy as a route to promote economic growth. A true commitment to a wellbeing economy places wellbeing as the central driver of the economy. This would include a commitment to removing inequalities and eradicating poverty, but would not necessarily consider economic growth as being a key focus. Indeed, when considering Scotland's ambitions to achieve net-zero emissions, it is questionable whether this can be achieved alongside an ambition for continued economic growth.

¹⁵ https://childreninscotland.org.uk/wp-content/uploads/2020/12/Manifesto-2021-26-V2_Spreads.pdf

¹⁶ <https://childreninscotland.org.uk/wp-content/uploads/2020/12/Childrens-Wellbeing-Budgets-Interim-Report-Dec2020-Gecko-2.2.pdf>

¹⁷ https://childreninscotland.org.uk/wp-content/uploads/2020/12/Manifesto-2021-26-V2_Spreads.pdf

We are pleased to see that the position statement makes a specific link between wellbeing and a green recovery. We are also pleased that the approach to the wellbeing economy is set firmly within the context of reducing inequalities. To achieve this requires systemic change and the scale of the challenge should not be underestimated.

Culture

We are particularly pleased to see a focus on culture and creative industries within the wellbeing economy section of the position statement. We are currently delivering our Living Museums project which aims to make museums and other cultural sites more reflective of the needs of children and young people. Ultimately, the aim is to increase engagement with museums among young people. This project may provide key learning about how the physical spaces of museums affect engagement which could have relevance for the planning system.

Children in Scotland has also recently begun work on an Emerging Minds special interest research group in partnership with Scottish Ensemble, Stirling University, and the Scottish Government¹⁸. The project will explore the impact of live music on the mental health of children and young people. The findings from this project may well be useful in shaping future discussions about how planning can support young people to access live music and wider cultural opportunities.

Digital Infrastructure

We are pleased to see that the position statement takes account of how to utilise digital technologies as a method of increasing opportunities for people to engage in placemaking. However, it is important to reflect on the experiences of the last 10 months and ensure that any digital engagement remains meaningful.

The coronavirus pandemic has meant Children in Scotland has moved all of our methods of engagement online. This provides many benefits including supporting people from more remote areas to engage in our work. It has also facilitated us working with more children and young people. However, it is important to remember that these methods bring their own challenges and limitations as well as opportunities.

In a post pandemic Scotland, digital methods of engagement should not be seen as a direct replacement for face-to-face work. It should be used to complement other engagement work where possible. It is also important that digital methods of engagement do not only rely on surveys as a way of gathering peoples views. We know these methods do not work for many children and young people, particularly younger children and those with additional support needs, and as such can limit who will be able to contribute.

“I think involving young people in the design of models to engage young people [is important], because a 40-year-old woman sitting in her bedroom designing a survey that she thinks teenagers are going to click on, is it going to be a survey that

¹⁸ <https://childreninscotland.org.uk/new-emerging-minds-project-will-look-at-how-live-music-could-boost-young-peoples-mental-health/>

teenagers are going to click on? Probably not.' (Ellie Roy, Member of Changing our World)¹⁹

It is also important to remember that the coronavirus pandemic has exposed the significant digital divide in Scotland. We know that many people struggle to access digital technology because of barriers such as cost and rural infrastructure. While these inequalities remain, digital methods of engagement will continue to exclude certain groups and communities.

Specific Policy Actions

Many of the specific policy actions sit outside of our area of expertise.

We would be broadly supportive of more place-based investment priorities as it is vital that children, young people, and families have a chance to contribute to identifying these priorities to ensure investment reflects their needs.

We would also be highly supportive of policy proposals that prioritise development that is good for wellbeing and also those which reflects the importance of cultural facilities.

4. Do you agree with our current thinking on planning for better, greener places?

Children in Scotland is supportive with much of the thinking on planning for better, greener places.

Place based outcomes.

We agree with proposals to take a place-based approach to outcomes. We believe that it is important this work emphasise the individual character of places across Scotland and should take a strengths-based approach. Our Health Inequalities: Participative Research Project and the findings from the CHANGE project have both highlighted the importance of looking at the strengths of places even when they face significant challenges²⁰²¹.

However, while taking a strengths-based approach, it is important to continue to recognise (as the position statement does) that some communities and places do face significant challenges and these requires support from local and national government to overcome. Taking a place-based approach to this will allow the individual strengths of places to be emphasised while also tackling the underlying issues that people who live there face. It is particularly important that much of this work will sit outside of the planning system and so clear links across policy directives are required. One key example is that poverty and inequality are key driver of place-based inequalities in health. As a result, we must continue to provide financial support for families for the benefits of planning reform to be fully realised by all.

¹⁹ Quote from a member of Changing our World – Children in Scotland's children and young peoples advisory group

²⁰ <https://childreninscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

²¹ https://childreninscotland.org.uk/wp-content/uploads/2021/02/CHANGE-Report_FINAL_3.1.pdf

Other comments

We are also supportive of measures to promote green spaces in the section on planning for better, greener spaces. In our response to question 2 on building more resilient communities we have outlined the issues with green spaces in some areas of deprivation and the impact this has on children's opportunities to play. Supporting high quality green space where children are empowered to play should be a priority for the planning system going forward.

In our response to question 2 we also highlighted our support for measures to reduce the density of vacant and derelict land. It is important that an inequalities approach is taken to this, with areas of deprivation with the highest levels of vacant and derelict land prioritised.

Specific Policy Actions

Children in Scotland would support further exploration of embedding the place principle and would be very supportive of wider use of the Place Standard Tool. We see this as a key way to engage children and young people in discussions about local planning.

As discussed previously, we would encourage measures to tackle vacant and derelict land and that the priority here should be given to tackling areas with the highest densities of these. Communities should also be involved in discussions about how this land can be put to better use.

As we have outlined above, it is important that policy to support development of local green space where children and young people can play is prioritised as this strategy is delivered.

5. Do you have further suggestions on how we can deliver our strategy?

Most of our comments and reflections on the National Planning Framework position statement have been clearly articulated throughout this response.

Meaningful resource and political will are required to deliver the strategy. The position statement outlines a range of positive policy suggestions that could support better places and, importantly, better outcomes for the people who live there. However, it is clear that this marks a shift in the approach to planning and will require ongoing political support to ensure that wellbeing and people are at the heart of planning processes, not developers and planners. Planning authorities will need a meaningful increase in resources to deliver on the aims of the strategy.

We have articulated throughout this response the need to ensure that children and young people are meaningfully involved in decisions about planning. We know from our project work that they have clear views about the places that they live and what could be changed. It is important for Scottish Government, Planning Authorities and others involved in planning locally to learn from projects like our Health Inequalities: Participative Research and also work done by Children's Parliament, Children's Neighbourhoods Scotland, and Planning Aid Scotland (PAS) that have

taken a place-based approach²²²³²⁴²⁵. These all provide examples of how to engage children and young people in discussion about places and planning.

We would also recommend the development of specific framework guidance on developing local place plans. This should build on work done by SCDC and Nick Wright Planning and Planning Aid Scotland's approach to local place plans²⁶²⁷. Children in Scotland has also conducted a range of place-based work that could be used to ensure any guidance for local place plans outlines how to meaningfully involve children and young people in these processes. Our own Principles and Guidelines for the Meaningful Participation of Children and Young People provide a basis for this²⁸.

Fundamentally it is important to remember that while some of the outcomes are 'place-based', many reflect wider systemic issues like poverty, inequality and discrimination. To tackle inequalities in health we need to tackle the underlying causes.

6. Do you have any comments on the Integrated Impact Assessment Update Report, published alongside this position statement?

No. We have no comments on the Impact Assessment Update Report

7. Do you have any other comments on the content of the Position Statement?

No. We have no further comments on the content of the position statement.

For more information, please contact Amy Woodhouse, Head of Policy, Projects, and Participation, awoodhouse@childreninScotland.org.uk

²² <https://childreninScotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

²³ <https://childrensneighbourhoods.scot/>

²⁴ <https://www.childrensparliament.org.uk/our-work/dunkeld-birnam/>

²⁵ <https://www.pas.org.uk/projects/>

²⁶ <https://nickwrightplanning.co.uk/lpps-scdc-sg-research.htm>

²⁷ <https://www.pas.org.uk/wp-content/uploads/2020/01/Local-Place-Plans-Guide-PAS-Approach.pdf>

²⁸ <https://childreninScotland.org.uk/wp-content/uploads/2019/09/CiS-Participation-2019.pdf>