



Open Space Strategies and Play Sufficiency Assessments

Children in Scotland Response

March 2022

About 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.

Background

Children in Scotland understands the impact that place and space have on children and young people's health, wellbeing and holistic development. Theme 6 of our 2021-26 Manifesto, created for the Scottish Parliament elections, focuses on Place, Space and Community, in which we call for a rights-based approach to community planning¹.

Alongside this consultation, we have responded to the current consultation on Scotland's fourth National Planning Framework. Previously, we submitted responses to the consultation on the Future of Scottish Planning and to the National Planning Framework 4 Position Statement²³.

Our ongoing engagement with the development of the Planning (Scotland) Act and the National Planning Framework 4, confirmed to us that the needs of children and young people are not always fully considered in decisions made about the places that they live. We see it as our role to champion their inclusion.

¹ https://childreninscotland.org.uk/wp-content/uploads/2021/03/Manifesto_V2.1_March-21.pdf

² https://childreninscotland.org.uk/wp-content/uploads/2018/02/Scottish-Government-Consultation-on-the-Future-of-Planning_Final.pdf

³ <https://childreninscotland.org.uk/wp-content/uploads/2021/02/National-Planning-Framework.pdf>

We also know from our own experience, and evidence from partners, that children and young people do not always have access to play spaces within their communities that meet their needs. Our health inequalities peer research project showed that this can be particularly problematic in areas of high deprivation⁴.

We are pleased to respond to the Scottish Government consultation on Open Space Strategies and Play Sufficiency Assessments. In particular we believe that Play Sufficiency Assessments could play a key role in supporting the work of Scotland's Fourth National Planning Framework and support better play opportunities for children and young people.

Open Space Strategies

Consultation Question 1

a) Do you agree with the idea of promoting an outcomes-based approach through the OSS Regulations? Yes/No/No View. Any Comments

Yes. Children in Scotland is strongly in favour of promoting an outcomes-based approach through the OSS regulations.

Since 2007, Scotland has had a wellbeing outcomes framework in the form of the National Performance Framework (NPF). The Scottish Government, all Scottish political parties, the Convention of Scottish Local Authorities (COSLA) and all public bodies have fully accepted the goals of the NPF.

In our 2021 Scottish Parliament election manifesto Children in Scotland called for the publication of a series of wellbeing outcomes specifically for children and young people. Over the last year, we have been working with Scottish Government to support the development of a set wellbeing outcomes for children and young people that will sit under the NPF. These are due to be published in April 2022. We recommend that the Scottish Government considers how these new outcomes can feature in the OSS regulations.

It is our view that a move towards outcomes focussed policy-making is a key way to promote change and drive improved outcomes for all. It is extremely positive to see this approach taken through the Open Space Strategies Regulations. We encourage Scottish Government to consider how an outcomes-based approach can be demonstrated across Scottish Government policy.

b) Do you agree with the suggested outcomes? Yes/No/No View. Any Comments

We believe that the suggested outcomes provide a positive starting point for considering how they could be used within open space strategies. However, they are very broad at present. Most actions could be identified as improving health and wellbeing in some way, but this will not necessarily provide evidence of improved outcomes for individuals. It would be worth considering more specific measures that will give greater focus to Open Space Strategies.

We appreciate that the Scottish Government wishes to use the outcomes as a set of principles rather than measures to be assessed against. However, we question if this

⁴ <https://childreninscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

amounts to an outcomes-based approach in practice. We would encourage the OSS Regulations team to engage with the work underway in Scottish Government to develop a series of wellbeing outcomes for children and young people and consider how these new outcomes can be embedded within the outcomes for the OSS regulations.

Consultation Question 4

a) Do you agree with suggested information to include about each open space (location, size and type)? Yes / No / No View Any Comments

b) Do you agree with Regulation 4(5) on the other information planning authorities may include in the audit? Yes / No / No View Any Comments

Children in Scotland believes that including location, size and type within open space audits feels appropriate. These should provide a useful guide for understanding what open space is available locally. We also believe having the types of space laid out in guidance will be of value. We were pleased to see play spaces given prominence within this and feel this will ensure they are considered during audits.

It is positive to see accessibility contained within the additional information for Open Space Audits and are clear about the essential need to consider adaptations for people with physical disabilities. We do, however, feel that it would also be beneficial to include additional information about quality within the audit. A place may have lots of open space, however we know from our experience it may not be used if children and young people do not feel a sense of ownership of it, struggle to access it due to lack of transport or because they do not feel safe there⁵. Questions relating to quality of open space could also be key to bring participation into open space audits as it would allow people to identify what open spaces they use, and why (or indeed, why they do not).

We appreciate that Scottish Government may feel that issues relating to quality of open space will be covered in regulation 4(5) on other information about 'the extent to which open spaces deliver those functions'. However, we would be strongly in favour of an approach that gives prominence to quality of open space and public perceptions of this. Whether people believe that the space is valuable will be key in whether people make use of the spaces that are available.

Consultation Question 5

a) Do you agree with suggested approach to require locality level place based information? Yes/No/No View Any Comments

**b) Do you agree with the three high level aspects that should be covered in these statements 'accessibility', 'quantity' and 'quality'?
Yes/No/No View Any Comments**

Yes, we can see value in having information down to locality level as there will likely be differences across a local area Our Health Inequalities: Peer Research project highlighted that often specific parks or streets are deemed less accessible than others due to litter or being unsafe⁶. Having more locality-based information as well

⁵ <https://childreninscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

⁶ <https://childreninscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

as broader local authority information may allow for more nuanced information and a better understanding of what communities need.

As we have highlighted above, we believe considerations of quality are particularly important for identifying whether people will use any open space in communities and should be threaded through the different levels of Open Space Strategies. We know from our work that issues of safety, cleanliness and state of repair can be central to whether or not children and young people access parks, green space or other local resources⁷.

We are also pleased to see that accessibility has been considered within the information required in relation to locality level place-based plans. It is essential that these considerations are given priority, not viewed as an add-on.

We know that many people have specific requirements which need to be met for them to access spaces locally, and that currently they often face barriers which prevent them from doing so. This goes beyond wheelchair accessible paths and play equipment, into considerations of disabled toilets and changing facilities for example. We strongly recommend the Scottish Government engages with organisations working with children and young people with additional support needs to ensure that their expert knowledge and understanding of what constitutes accessibility informs these statements.

As we have highlighted throughout this response, it would also be of value to consider how participation and engagement can be embedded within Open Space Strategies. This also applies to locality level place-based information. Information relating to accessibility and quality of open space will be enhanced by engagement with the communities who access it, hearing their perspectives on whether it meets their needs and how it could be improved.

It is worth noting that engagement with local communities (including children and young people) is now required for local place plans as articulated in the Planning (Scotland) Act. It would be worth considering how these regulations will interact with those duties to ensure they are aligned.

Consultation Question 6

Do you agree with the list of consultees for the open space audit?

Yes/No/No View Any Comments

We are pleased to see a list of groups that should be engaged with through an open space audit and that the needs of children and young people have been considered here.

We would encourage the Scottish Government to consider how an equalities focus can be embedded within the list of consultees for the open space audit and consider stating that there should be engagement with people with protected characteristics, for example. It is important that all groups within the community have an opportunity to contribute and to comment on whether local open space meets their needs or to highlight barriers.

⁷ <https://childreninscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

We would encourage the Scottish Government to consider expanding the key agencies included in point f). At present these miss many key groups that could support the engagement of children and young people or may already have relevant information to inform the audit. For example, this could include local Third Sector Interfaces, Community Planning Partnerships and others who may have been involved in developing Children's Services Plans. These groups and partnerships similarly could be used to support engagement with children and young people with protected characteristics by linking in with key local organisations who work with these groups.

We are pleased to see that the Scottish Government will not prescribe how engagement will be conducted but will encourage Planning Authorities to adapt their work to meet those they wish to engage with. We would encourage guidance for planning authorities to support them in this work and ensure they have the tools to conduct meaningful engagement. Children in Scotland conducts a range of participation and engagement work and could support Planning Authorities with the development of this. Our own Principles and Guidelines for the Meaningful Participation and Engagement of Children and Young People would also provide a helpful starting point for Planning Authorities to develop their thinking on how to engage with children and young people⁸.

Consultation Question 7

Do you agree with the Assessment of Current and Future Requirements should,

a) have regard to how open spaces and green networks in their area are contributing to the outcomes ? Yes/No/No View Any Comments

b) be informed by engagement with the groups set out?

Yes/No/No View Any Comments

Yes. We believe that the Assessment of Current and Future Requirements should have regard for how they contribute to the outcomes. In doing so it will mean that the approach is embedded and that these are considered at all stages. As we have highlighted previously, we believe the outcomes could be strengthened. Giving these more focus and weight would also be of benefit here, allowing for more considered thought about how future requirements can make specific improvements, rather than simply 'improving health and wellbeing'. Ultimately, we are concerned that almost any future requirements could be said to improve the outcomes in their current form.

We also believe that the Assessment of Current and Future Requirements should be informed by the engagement with the groups that are set out in the regulations, and the additional groups we have identified. Ultimately, if the engagement does not inform current thinking and future planning then it will be tokenistic. It is vital that if children and young people feed into the strategies, then they have an opportunity to meaningfully inform these.

Consultation Question 8

Do you agree Open Space Strategies should

a) include a statement setting out how they contribute to the outcomes?

Yes/No/No View Any Comments

⁸ <https://childreninscotland.org.uk/wp-content/uploads/2019/09/CiS-Participation-2019.pdf>

Yes. Similar to above, we believe that for an outcomes based approach to be fully embedded within the Open Space Strategies they need to be included at all stages. A statement which sets out how the strategy will contribute to the identified outcomes would support this. It would also be of value for this statement to specifically link to engagement work and show where the community have identified how specific actions would support them and ultimately improve their outcomes. This could utilise a mix of quantitative and qualitative evidence to show the impact the strategy will have.

Individual Open Space Strategies may wish to expand on the outcomes to provide more tailored local outcomes that the community have identified within them. This could be informed by engagement work and be a potential route for embedding participation within the strategies and their aims.

Consultation Question 9

Do you agree with the proposed consultation requirements on draft Open Space Strategies?

Yes/No/No View Any Comments

We are pleased that the Scottish Government has stated that 12 weeks should be set aside for the consultations. Participation work with children and young people takes time to conduct meaningfully, and an extended time period will support this.

It is also positive that the consultation requirements outline that the groups who were engaged with during earlier stages of the audit are engaged with on the draft Open Space Strategy. We know how important closing the feedback loop is for children and young people, so they know what has happened with the information they shared.

We would suggest that there is an additional requirement to reach out to local organisations working with children and young people to share information and to facilitate engagement. This type of outreach will facilitate a wider array of children and young people who can feed in and ensures that the strategy is representative.

We would also suggest guidance on how to provide the strategy in accessible language to ensure it is understandable to all. We would also encourage additional requirements on how the consultation on draft strategies are framed. It is important respondents have an opportunity to meaningfully inform the final version, not just a simple agree or disagree.

Consultation Question 10

Do you agree with the proposed publication requirements for the OSS?

Yes/No/No View Any Comments

We believe online publication of the final OSS is a sensible approach. We would also encourage a requirement to send the final version to all those who contributed to its development. The final strategy should also be published in accessible language. We would also encourage development of additional resources to support awareness of the strategy.

Play Sufficiency Assessments

Consultation Question 12

Do you agree with the proposed definitions?

“children” Yes/No/No View Any Comments

“localities” Yes/No/No View Any Comments

“open space” Yes/No/No View Any Comments

“play spaces” Yes/No/No View Any Comments

Yes, Children in Scotland broadly agrees with the proposed definitions. It is positive to have a definition of children that extends up to 18 years old as we know that different ages have different requirements for play space in their community. To support wider understanding of this, it may be beneficial to change the definition to 'children and young people', rather than just children.

We would encourage inclusion of indoor and outdoor within the definition of play spaces. We know the benefit that outdoor play has for children and their development. However, there are also a range of meaningful play opportunities that do take place inside and this should be recognised. We suggest exploring how people undertaking play sufficiency assessments for Local Development Plans can be supported to understand the different types of play and the different benefits they will have.

It is unclear whether children and young people have been consulted on these definitions to ensure the regulations reflect their views. Children may define a play space entirely differently and it would be of value to ensure this has been considered.

Consultation Question 13

Do you agree planning authorities should map the locations of the two categories of play spaces, and how they are described in draft Regulations 3(2)(a) and (b)?

Yes/No/No View

We would encourage the Scottish Government to reconsider whether only the two categories of play space should be mapped. While we appreciate that mapping all potential places in which children and young people play within an area may prove challenging, it would also add value to have a slightly broader view.

Given the level of responsibility for producing better health and wellbeing that will come as a result of Scotland's Fourth National Planning Framework, there is a risk that things which are not legal requirements could be missed. We know that the needs of children and young people are often not considered within planning decisions and are concerned that the chosen approach could mean the wide range of play spaces they use are not fully recognised and as such do not feature in local thinking about planning.

It may be helpful for Scottish Government to consider a hybrid approach to the mapping exercise that embeds participation and engagement of children and young people within the assessments. Planning authorities could engage with children to identify additional play spaces while not necessarily requiring a mapping of every single space children play in. This would allow for some evidence of other key spaces that fall outside the two definitions currently being considered.

Consultation Question 14

Do you agree with the proposed requirement to assess play opportunities in respect of their suitability by age groups? Yes/No/No View Any Comments

Yes. We know that children and young people have different requirements from play spaces. It is important that the different needs are considered to ensure that opportunities are available for all. We are aware from some of our project work and from recent discussions at our Voices Forum meetings that spaces for older young people to 'hang out' in are often lacking or do not take account of their needs. Having an age bracket approach may be helpful here.

However, it is important to remember that all children and young people are individuals and may not wish to access play spaces which are aimed at their age bracket. The consultation document somewhat engages with this and identifies that Scottish Government will continue to engage with stakeholders on what is 'appropriate' for different age groups. We would encourage Scottish Government to ensure the views of children and young people are sought here.

It is important for the Play Sufficiency Assessments to consider more than the physical availability of spaces. It is positive to see the indicative tool in the consultation document consider issues such as bullying or safety when considering what makes for a good play space. We know from our Health Inequalities: Peer Research project that safety can play a key role in whether people wish to access play spaces⁹. From discussions at our recent Voices Forum event, we know that for older young people, play may take place in youth centres or other places with staff that they 'hang out' in. We know that some groups of young people struggle to access these spaces if they have been excluded or banned from visiting them. This can limit what young people actually have access to, even if it is physically available.

We believe that developing the indicative tool within future guidance, as is suggested in the consultation would be beneficial as it would help the wide range of issues that affect access to play spaces to be considered. We would encourage work with children and young people to develop these to ensure that their views inform Scottish Government thinking on different types of play spaces and the specific benefits, or barriers, of access for children. It is also worth highlighting that consideration of the wider context in which play occurs may also mean solutions that sit beyond building or redeveloping play spaces. It is important that there is joined up thinking locally to support this and ensure better outcomes for children and young people.

Consultation Question 15

a) Do you agree with the proposed three aspects of assessment – 'accessibility', 'quantity' and 'quality'? Yes/No/No View Any Comments and ;

b) to provide them in written statements in respect of the totality of the local authority area and at each locality level? Yes/No/No View Any Comments

Yes. We agree with including 'accessibility', 'quantity' and 'quality' as proposed aspects of assessments. We are also pleased to see reference in the consultation to how children and young people can share their views on these. We believe there would be value in the Scottish Government considering developing future guidance

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

on participation of children and young people in planning and play sufficiency assessments to ensure this is done meaningfully.

The three identified aspects provide a broad overview of the suitability of play spaces and allow children and young people to feed in about why they use particular spaces or not. As we have highlighted previously, our Health Inequalities: Peer Research project found that issues such as fear of violence or substance misuse can impact whether people access parks and green space. We believe that the aspects of assessment that are included will allow these issues to be identified by going purely beyond quantity. However, it will be worth considering whether planners may need support to understand these broad range of issues that could affect access.

We would strongly encourage the Scottish Government to add 'Inclusion' to the aspects of assessment. The consultation document currently makes reference to this and highlights the importance of ensuring play spaces meet the needs of disabled children and young people and their families. This requires a holistic assessment of each play space, including travel options and access routes, accessible toilets and changing facilities, as well as play equipment. This required to be given a greater priority within the Play Sufficiency Assessments.

Doing so will ensure the needs of **all** children and young people are considered within the assessments and that a wider range of needs are met. It is positive that further detail on this will be provided in future guidance, however we believe there would be value in making detailed reference to accessibility at this stage.

Consultation Question 16

a) Do you agree to the requirement to consult as part of the process of carrying out the play sufficiency assessment? Yes/No/No View Any Comments

b) Do you agree with the proposed list of consultees on play sufficiency assessments? Yes/No/No View Any Comments

Yes. We believe that it is positive that there is a requirement to consult on the Play Sufficiency Assessments and that children and young people are included within this. As the document states, as outlined in Article 12 of the UNCRC, children and young people have a right to be heard in decisions that affect them. As the key stakeholders they must have a clear voice in the assessments.

As in relation to the Open Space Strategies, we would encourage the Scottish Government to expand the list of proposed consultees to make reference to organisations working with children and young people and also to make reference to engagement with people with protected characteristics. We believe working through local organisations may support more children and young people to engage with the process. Organisations working with children and young people may also have existing evidence that they can feed into the assessment.

Consultation Questions 18 and 19

18 Do you have or can you direct us to any additional information that would assist in finalising these assessments (BRIA, EQIA, CRWIA, ICIA)?

19 Please give us your views on the content of these assessments and how they have informed the draft provisions, or if you think changes are needed to the

Regulations to further respond to the issues.

Children in Scotland has not been able to comment on the assessments that have been conducted as these do not appear to have been made available by Scottish Government. It is positive that consideration has been given to an EQIA and a CRWIA. Children in Scotland would be interested to see how these have informed policy development.

For more information

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