



Scotland 2045: Scotland's Fourth National Planning Framework

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 has a growing interest in planning policy in Scotland. Staff within the organisation are not experts on planning or indeed planning policy. However, we know the impact that place and space has on children and young people's health, wellbeing and holistic development. In recognition of this, Theme 6 of our Manifesto for the 2021 Scottish Parliament election focused on Place, Space and Community.

We have contributed to the ongoing development of Scotland's fourth National Planning Framework including submitting responses to the consultation on the Future of Scottish Planning and to the National Planning Framework 4 Position Statement¹².

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 decision-making about the places that they live. We see it as our role to champion their inclusion.

Children in Scotland has also conducted a range of project work that intersects with planning policy. This includes our Being Bold report, written by Katherine Trebeck which lays out how the budget process can be used to develop a wellbeing budget

¹ https://childreninscotland.org.uk/wp-content/uploads/2018/02/Scottish-Government-Consultation-on-the-Future-of-Planning_Final.pdf

² <https://childreninscotland.org.uk/wp-content/uploads/2021/02/National-Planning-Framework.pdf>

³We also delivered the Health Inequalities: Peer Research into the Role of Communities project. This project explored how children and young people feel the places they live affect their health and wellbeing⁴. The report has subsequently been supported by an academic paper that shares the learning⁵.

Our response has also been informed by our recent Voices Forum event on planning, held in March 2022. This event for Children in Scotland members explored how we can support child-friendly spaces. The discussion has informed our response to the consultation. We can also provide further evidence and details of views from across the sector if helpful for the Planning Framework team.

The impact of the Covid-19 pandemic has emphasised the importance of place and space for children and young people; decisions to open play spaces early in the pandemic were taken in recognition of their importance for children and young people's health and wellbeing. As we recover from the pandemic, it will continue to be important that planning decisions work to support and enhance the needs and wellbeing of children, young people and families. The National Planning Framework therefore must have the needs of children, young people and families at its heart.

Overarching Comments

Children in Scotland appreciates the commitment to changing the aims and purpose of planning. Children in Scotland and its members who attended our recent Voices Forum believe it is positive that planning has been asked to deliver on health and wellbeing outcomes over growth. However, we also believe that at present the action contained within the framework does not go far enough to support the desired transformational change. This concern was also shared by many members at our Voices Forum event.

We recognise that wellbeing focused planning requires specific knowledge and understanding of public health approaches and we question whether the skills and knowledge required to achieve the change desired are included at present within the wider planning workforce that will be responsible for administering the framework. This will need to be addressed if planning decisions are to be effective in achieving health and wellbeing goals.

At our recent Voices Forum we also discussed the barriers that planning policy and implementation can face making sure the places children and young people grow up meet their needs. While the sector is supportive of changing the aims of planning, there is a lack of confidence that ultimately health and wellbeing will be prioritised over high value developments. It would be of value for Scottish Government to clearly demonstrate its commitment to health and wellbeing focused planning and to clearly articulate how this will be achieved locally, when other more financially lucrative options are available.

Children's Rights

³ <https://childreninscotland.org.uk/wp-content/uploads/2>

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

⁵ <https://www.sciencedirect.com/science/article/pii/S0277953621005189?via%3Dihub>

We believe more reference could be made to the specific needs of children and young people within NPF4. References to children and young people are mainly in relation to specific issues such as play spaces. However, this does not fully recognise the impact that the wider planning system has on their lives and the importance it has in providing a safe, healthy environment to grow up in. The National Planning Framework 4 would be strengthened by considering children and young people's needs throughout the document, rather than in relation to 'children and young people's issues'.

We believe this could be tackled by taking a child rights lens to NPF4. The Scottish Parliament unanimously passed a Bill to incorporate the UN Convention on the Rights of the Child (UNCRC) in June 2021. While the bill has been challenged in the Supreme Court, the Scottish Government has continued to affirm its commitment to incorporation. However, this commitment is not currently reflected within the NPF4, and we were surprised and disappointed that the UNCRC was not referred to in the document. This does not reflect the wide-ranging impact the planning system will have on the rights of children and young people, including their right to health, to take part in cultural activities, and to have a say in issues that are important to them.

The next draft of the NPF4 should be clearly articulated with a children's rights lens. While we appreciate an effort has been made to do this through the Child Rights and Wellbeing Impact Assessment contained in the integrated impact assessment, we do not feel this has been articulated in the framework itself. Doing so will allow the document to be articulated in terms of its impact on realising children's rights.

We also recommend that NPF4 adopt a 'child-friendly cities' approach, to further embed children's rights within the framework. UNICEF's child friendly cities model provides an opportunity for local authorities to work with children and young people to ensure the area they live in meets their needs. We would encourage the planning framework team to engage with UNICEF and consider how this approach could link to the National Planning Framework.

Participation

It would be helpful to revisit how participation in planning decisions is articulated within the document. At present the NPF4 does not articulate how the views of children and young people will be gathered on planning decisions nor identify what routes to engage there will be. Situating the NPF4 within the context of children's rights may support better and more consistent practice in this area. Article 12 of the UNCRC identifies that children and young people have a right to be heard in decisions that affect them.

While NPF4 makes reference to the duty contained within the Planning (Scotland) Act to engage with communities in the development of local place plans, little consideration is given to other avenues for participation and engagement throughout the whole system and it is not clear how this would work in practice.

Failing to articulate how participation would be embedded at all levels of the system undermines the desire for a transformation of planning in Scotland. By taking a child rights approach, NPF4 could consider how it supports participation at all levels from Local Plan Places up to national decision-making.

We appreciate that the supporting participation statement is intended to do this, we believe it would be better included within the final NPF4 and indeed would add more value than some of what is currently contained within the framework. Children in Scotland has a range of experience supporting participation and engagement and would be happy to support Scottish Government to develop its thinking in this area.

Wellbeing Economy and outcomes based approaches

We are pleased to see that NPF4 engages with the Scottish Government's ongoing work to develop a wellbeing economy. However, we believe that further work is required to ensure NPF achieves its potential in this area. A wellbeing economy is a defined approach that requires a significant recalibration of priorities, moving away from an economic growth model and towards one based on wellbeing outcomes. It is not simply a case of highlighting policies that we believe will contribute to wellbeing.

Within the context of planning, utilising a wellbeing economy approach would mean framing the entire NPF4 in terms of improving wellbeing outcomes. We would be highly supportive of such an approach but are not convinced this has been achieved within the current draft. The Being Bold report would provide guidance to the Planning Framework team on how policy can be directed towards wellbeing.

Children in Scotland is also involved in work with Scottish Government through the Children's Sector Strategic Forum to support the development a series of wellbeing outcomes for children and young people, that will sit under the National Performance Framework outcomes. Engagement with and reference to this work would be a positive within NPF4 as would reference to how it will deliver on the National Outcomes. We are also aware that Scottish Government is also currently consulting on Open Space Strategies, which explicitly looks at an outcomes based approach. It may be worth considering whether a similar approach can be used within NPF4.

Consultation Questions

National Spatial Strategy

Q1 -5

While we broadly agree with Sustainable Places, Livable Places, Productive Places and Distinctive Paces as 4 underpinning areas of a spatial strategy, we do not feel comfortable answering questions 1-5. The level of detail provided at this stage does not allow us to be confident in saying whether or not they will support 'future places, homes and neighbourhoods which will be better, healthier and more vibrant places to live'.

While all articulate a positive vision for planning and a spatial strategy, they do not in themselves amount to an 'approach' or a 'strategy'. It may be more helpful to present these as goals or intended outcomes. Ultimately, fully reforming the planning system will take time and work and we do not believe the spatial strategy fully reflects that at this stage.

Q6 - Do you agree that these spatial principles will enable the right choices to be made about where development should be located?

We believe there are a number of positive aspects of the spatial principles included within the National Planning Framework 4. In particular we are pleased to see local living included and the specific reference to 20-minute neighbourhoods. We believe this could be strengthened with specific reference to prioritising the needs of children and young people within this.

However, we also believe there are a number of ways the principles could be improved. Firstly, there may be some value in having a principle that relates directly to children and young people. One option may be to have a principle defined as 'child-friendly', such a principle could articulate the need to ensure spaces are reflective of the needs of children and young people and that their views have been considered. This may be an opportunity to learn from the UNICEF Child Friendly Cities Approach. While we appreciate that the principles cannot articulate how they will meet the needs of every group, we know that children and young people are particularly reliant on planning policy, and so it is a useful framing mechanism⁶.

The principles could also have *equalities* embedded more effectively within them.

We know that place can be a key determinant of health and wellbeing and that there are high levels of inequality between different places. Indeed, this is reflected and understood within the wider NPF4. However, the spatial principles do not take account of this. As such we would be keen to see the principles rewritten in some way to include a specific focus on reducing inequalities, particularly in health. Indeed, the spatial principles could specifically identify that planning and development will be targeted towards particular areas where outcomes are worst.

It would also be worth having reference to an equalities focus within the spatial principles. We know that certain groups (in addition to children and young people), such as women or people with disabilities have specific needs that are not always reflected within the planning system. We are aware that the Scottish Government has held a series of engagement events on this topic and would be keen to see this focus reflected within the spatial principles.

One approach for this would be to link in with work underway within Scottish Government about wellbeing outcomes and wellbeing budgeting. Children in Scotland has been an active partner in this work, which looks to identify a series of measures of children and young people's wellbeing. It may be worth linking spatial principles with these outcomes as well as Scotland's National Performance Framework

Q7 - Do you agree that these spatial strategy action areas provide a strong basis to take forward regional priority actions?

We are not going to comment on each specific action area as we do not know enough about the local context. To some extent we can see the rationale for regional priority actions to support development. However, it does not feel like their purpose has been fully articulated within the document nor how they will function. We have a number of comments based on our experience within the children's sector.

⁶ <https://childfriendlycities.org/why-build-a-child-friendly-city/>

The action areas do not appear to map onto any existing regional structure. This potentially adds an extra layer of complexity for people looking to engage with the system and for those involved in it. In 2019 Scottish Government introduced Regional Improvement Collaboratives (RICs) that were set up to support improvement in Scottish Education. We are aware there have been challenges in embedding these RICs within local areas and identifying a specific role for them. Similar challenges could face the action areas laid out within National Planning Framework 4.

We would also be interested to know more about how formalised the areas will be. Will there be regional oversight of each action area or is the approach less formal? This is not made clear within the document.

Ultimately, we remain unconvinced about the regional priority actions, but would be interested to know more. If they are to become formalised with a defined governance structure, then we would be interested to consider how participation could be embedded at this level.

National Planning Policy

We have not commented on all policies contained within the National Planning Policy Section. We have instead split our response up into the four national policy areas and considered policies of particular relevance to the needs of children and young people.

As we have highlighted within our overarching comments, there is a lack of detail about how policies will be implemented and the plans do not go far enough to identify routes for participation in decision-making. As such we are concerned that they will not achieve the intended change that is desired through NPF4. We have identified specific additions and changes to policies that we felt able to comment on to support the next steps for NPF4.

Children in Scotland identified a number of key national policies in our 2021 Scottish Parliament election manifesto that we believe should be prioritised within national planning policy and would help achieve the aims of NPF4⁷:

- Building rights-based communities around the things children and families need, using UNICEF Child Friendly Cities as a framework across small communities, towns and cities. They should ensure that local authorities have the guidance and financial resources to make this happen
- Increasing planning restrictions on off-licences and betting shops near to schools, playgrounds and other places where children gather
- Ensuring that all families are able to access high quality, affordable housing by improving the quantity, quality and environmental sustainability of the social housing supply in Scotland

⁷ https://childreninscotland.org.uk/wp-content/uploads/2021/03/Manifesto_V2.1_March-21.pdf

- Publishing a revised Climate Change Plan and taking the necessary steps to ensure legally binding targets on greenhouse gas emissions in Scotland are met. This includes a 75% reduction in emissions by 2030 and a clear pathway to net zero by 2045
- Improving air quality in locations where children live, learn and play. A school air quality monitoring and education scheme should be introduced to measure air quality, educate children and families about this issue, and reduce children's exposure to harmful pollutants
- Producing a comprehensive Wellbeing Budget by 2022. This will ensure that the annual Scottish budget is designed and implemented with the goal of improving the wellbeing of all citizens in Scotland, including children, young people and families.

We believe embedding all of these within national planning policy would improve NPF4 and support it to achieve its stated aims. We would be happy to discuss these in more detail with the National Planning Framework team.

Sustainable places

We are pleased to see Policy 2 gives consideration to the climate emergency. As the document rightly notes, any new development will naturally produce emissions and it is essential that plans take account of and try to minimise these. We know this is a vital issue for children and young people and that urgent action is required if Scotland is to achieve its net zero targets.

We believe that the policy is lacking in detail on how sustainability will be achieved. We also believe the policy could be strengthened by tighter language about when developments will be supported. It is positive to see reference to developments needing to demonstrate that they are being undertaken with the minimum emissions possible. However, it may also be worth considering whether upper limits on emissions should be considered. If we want to make progress towards net zero, then it may be that certain developments are not viable even if there is a 'public interest'.

We are also pleased to see that human rights and equalities have been considered in national policy for the NPF4 (Policy 4). However, we are concerned that there is a lack of detail in this section and as such do not feel fully confident at present that human rights and equalities will be prioritized. It would be of value for the Scottish Government to consider how it can include more detail on how this will work in practice. A first step would be to include a requirement for new developments to conduct Equality and Human Rights Impact Assessments and Child Rights and Wellbeing Impact Assessments. This would ensure that developments take account of the needs and rights of different groups. It would also be of value to articulate how participation will be embedded in the system, this will be a key route for identifying the needs and interests of different groups to ensure they are understood and accounted for.

Policy 6 relating to Design, Quality and Place is also of value and we believe that the inclusion of the 6 principles of a successful place may be helpful. However, there is

also potential for confusion with the Spatial Principles and the criteria for 20-minute neighbourhoods. We would also encourage the Scottish Government to consider how the qualities can take account of Public Health Scotland's existing Place and Wellbeing Outcomes.

Our members were broadly positive about the 6 qualities that are identified in the document and they were pleased to see lifelong health and wellbeing prioritised within these. However, members did highlight that the needs of children and young people are not fully considered. We would be strongly in favour of including specific reference to children and young people in these qualities, indeed it may be worth including a quality of 'child-friendly'.

Members also noted the importance of places being well connected for supporting children and young people to play, socialise or access employment opportunities later on.

However, Children in Scotland members were keen to see greater reference to co-design and participation within any qualities used to define a successful place. Our members felt this was central to ensuring places work for children and young people. Members highlighted for example that having green space in the area may not in itself be an indicator of success, if local people do not feel ownership of the space or have any say in how it is designed or used.

The qualities could also make explicit reference to accessibility. We cannot consider places successful if they do not take account of the wide range of needs and additional support that some people may need to access them.

We also wondered whether any engagement had been conducted with children and young people on these principles. We would encourage the planning team to explore such engagement to ensure that the principles take account of the views of children and young people.

Livable places

There are many aspects of the National Policy on Livable Places that we are supportive of. We are pleased to see that Policy 7 emphasises the importance of 20-minute neighborhoods and that the policy articulates that developments that promote this approach will be supported. As mentioned in the previous section, we believe that it would be of value to make an explicit link between 20-minute neighbourhoods and the 6 qualities of successful places.

We believe this section could be strengthened by making specific reference to participation locally relating to what communities want and need from their own 20-minute neighbourhoods. Our members were clear that a sense of ownership is important, and we believe that for such approaches to local living to work they need to be embedded within the needs of the local community.

We also feel some of the language contained within the policy could be strengthened. At present point b) under Policy 7 states '*Development proposals that are consistent with the principles of 20-minute neighbourhoods should be supported*'. The Scottish Government may wish to consider whether a follow-up statement which explicitly states that proposals that are inconsistent with a 20-minute neighbourhood

approach should not be supported. This would of course need to take account of the specific needs of different communities and also be tied to the 20-minute neighbourhood approach, not strictly to the 20-minute time frame which may not work for all areas.

We are also particularly pleased that within the section on local living there is a focus on prioritising play parks. We know how important these are to help children and young people to play, socialise and develop. We also know from our Health Inequalities project that not all play spaces meet the safety needs of children and young people (ref). This can be because of where play parks are situated, who uses them or how they are maintained. It is vital that any safety concerns are fully addressed so that children and young people can freely enjoy them,

Our members indicated that they wanted the NPF4 to focus on how play spaces could be adaptable so that children and young people could engage in more free play. They also felt opportunities for play and development needed to be threaded throughout communities, rather than be limited to specific play spaces. It would be of value to consider how policy on 20-minute neighbourhoods links with plans for Play Sufficiency Assessments so that they are clearly aligned.

Children in Scotland members also highlighted that they wanted to see safe and affordable housing added to the criteria on 20-minute neighbourhoods.

We were pleased to see high quality homes reflected within Policy 9. As highlighted above in relation to 20-minute neighborhoods, we know that many young people struggle to access safe and affordable housing. As such we are pleased to see within Policy 9 that developments that offer affordability will be 'supported', however we believe Scottish Government should go further to say that these will be 'prioritised'.

The National Planning Framework team should also explore what high quality homes look like for young people and how this intersects with Policy 7 on 20-minute neighbourhoods. We know from a range of our work including Beyond4Walls as well as through engagement with members that for young people the safety of the local area and access to the resources they need such as parks, transport and shops are key to housing feeling appropriate and safe⁸. Policy 9 would be strengthened by making stronger links between 'quality' of housing and the resources that are around it. We would be strongly in favour of clearer policy to support this in NPF4.

We would also like to see additions to this section that specifically focus on social housing. We highlighted the importance of this in our 2021 Scottish Parliament Election manifest⁹. We would encourage the Scottish Government to commit more firmly to increasing social housing stock in NPF4.

We are pleased to see the commitment to sustainable transport within Policy 10. It is positive to see specific reference in NPF to not supporting developments which increase reliance on private car use. It is also positive to see reference to ensuring transport links and we would be in favour of a specific focus on improved transport links between areas outside of main cities. At our recent Voices Forum, members

⁸ https://childreninscotland.org.uk/wp-content/uploads/2018/01/Beyond4Walls_Report.pdf

⁹ https://childreninscotland.org.uk/wp-content/uploads/2021/03/Manifesto_V2.1_March-21.pdf

highlighted how often young people have to travel to cities to then travel out again to socialise or access work and support. Greater clarity on policy to support sustainable travel in these situations would be of value in NPF4.

We would also be keen to see more specific reference to Active Travel in relation to Policy 10. We know that active travel will play a key role in sustainable modes of transport. It would also be worth NPF4 reflecting on the factors which impact on children and young people's participation in active travel. Our Health Inequalities research highlighted that safety can affect how much children and young people want to access parts of their community¹⁰. Our Changing Gears project highlighted the need to support children and young people financially to participate in active travel to reduce the personal costs¹¹. Taking account of these issues will help support the overall aims of NPF4.

We are also pleased to see prominence given within national policy for play and sport through Policy 12. We are particularly pleased that point b) of Policy 12 highlights that '*Local development plans should identify new, enhanced provision or improved access to play opportunities for children*'. We know that in many areas provision does not meet the needs of children and young people as they do not see it as high quality or indeed because it is unsafe¹².

We are however slightly concerned by some of the language in points e) & f) which talk about replacing sports and play facilities if there is a lack of ongoing or current demand. In such circumstances we would question whether 'lack of demand' for facilities is indeed that or facilities are not being used due to quality, access or cost issues.

A focus on participation locally to ensure young people can identify what they want and need from local play and sport spaces would be of value here, it could help increase demand by allowing young people to identify what they want development of play and sport facilities to prioritise.

We are also slightly concerned that children and young people's needs are only considered in relation to specific play spaces rather than considering how opportunities for play and development can be threaded throughout local areas. As is highlighted in the Scottish Government's current consultation on Play Sufficiency Assessments, play happens throughout communities, not just in designated play spaces. In line with this, Children in Scotland members highlighted through our recent Voices Forum event that there need to be adaptable spaces across whole communities that children and young people can use for play. This is not currently reflected in the document.

As such we believe point k) of Policy 12 should make reference to adaptability within the criteria of play spaces. We would also like to see these criteria make reference to participation of children and young people locally to ensure play spaces meet their needs and that they feel a sense of ownership.

¹⁰ <https://childreninscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

¹¹ <https://childreninscotland.org.uk/wp-content/uploads/2021/06/Changing-Gears-Final-Report.pdf>

¹² <https://childreninscotland.org.uk/wp-content/uploads/2020/02/Health-Inequalities-Report-Chris-Ross.pdf>

We would also encourage the National Planning Framework Team to engage with Play Scotland to explore how they feel policy relating to play can be further developed.

It is positive to see a focus on lifelong health and wellbeing through Policy 14. We are pleased to see NPF4 make reference to how the planning system can help tackle health inequalities. We are pleased to see a focus on developing health and social care facilities. We believe that policy could be considerably strengthened by taking a broader look at how planning can support health and wellbeing and reduce inequalities. Ultimately, health and social care facilities are only one determinant of health. Planning policy has the opportunity to affect a far wider range of determinants of health. We know that air quality, play space and housing are affected by planning policy as is referenced through NPF4. We would encourage Policy 14 to take account of this and take an explicitly social determinants of health approach to planning policy.

Productive Places

We are not as well placed to comment on the range of national policies included under the Productive Places heading. We do however feel that the Scottish Government will need to carefully navigate the tensions between Productive Places and Liveable Places. While they are not incompatible, we are concerned that without the appropriate policy (or indeed political will), issues like tourism and productivity which are very focused on supporting the economy could be prioritised over local living and ultimately the wellbeing of people. We would encourage the National Planning Framework team to explore the Being Bold report as a way to consider how wellbeing can be consistently prioritised.

We are however pleased to see the focus on culture and creativity through Policy 18 in the Productive Places section. We know through our work on projects such as the Living Museums and Heritage Hunters projects the value young people place on culture and heritage opportunities. However, we also know that these spaces do not always meet the needs of children and young people and often are not accessible enough¹³. We would strongly support additional policy which prioritises accessibility in cultural spaces to ensure everyone can access them. We would support further consideration of how children and young people can be involved about decisions about the types of cultural spaces available locally.

Distinctive Places

As with Productive Places, we have comparatively less to say about policy relating to Distinctive Places. However, our members were clear that having distinct unique places is important and this should be prioritised within planning decisions. This is another key area where participation and engagement of children and young people will be key. To ensure that places are distinct and unique, the people who live there need to have opportunities to shape them, so they have a sense of ownership.

Further Information

¹³ https://childreninscotland.org.uk/wp-content/uploads/2022/01/LM-Report_Final.pdf

If you would like further information about our response, please contact Amy Woodhouse, Head of Policy, Projects and Participation, awoodhouse@childreninscotland.org.uk