

Consultation on Open Space Strategies and Play Sufficiency Assessments Regulations

December 2021



Contents	Pages
Scottish Government Consultation Process	3-6
<ul style="list-style-type: none"> ○ Responding to this Consultation ○ Handling your response ○ Next steps in the process ○ Comments and complaints ○ Consultation to date, and planned 	
Introduction	7-8
Open Space Strategies	9-28
Benefits of Open Space, Green Infrastructure and Green Networks & Link to National Planning Framework 4	9-10
Purpose	10
Outcomes based approach	11
Scope of Open Space Strategies	12-13
Definitions	14
Open Space Audit	14-15
<ul style="list-style-type: none"> ○ size threshold ○ data collection ○ place-based information ○ engagement on the audit 	15-22
Assessment of current and future requirements	23-24
Open Space Strategy	25-28
<ul style="list-style-type: none"> ○ content ○ consultation on draft Open Space Strategy ○ publication ○ review 	
Play Sufficiency Assessments	29-38
Benefits of Play Opportunities & Link to National Planning Framework 4	29
Purpose – Link to Local Development Plans	29
Wider Statutory Context	29-30
Interpretation	30
Form and Content	30-36
Consultation	37
Publication	38
Impact Assessments	39
Full List of Consultation Questions	40-42
Draft Regulations	43-48
The Town and Country Planning (Open Space Strategies) (Scotland) Regulations 2022	43-46
The Town and Country Planning (Play Sufficiency Assessment) (Scotland) Regulations 2022	47-48
Thanks	49

Scottish Government Consultation Process

Consultation is an essential part of the policymaking process. It gives us the opportunity to consider your opinion and expertise on a proposed area of work.

You can find all our consultations online: <http://consult.gov.scot>. Each consultation details the issues under consideration, as well as a way for you to give us your views, either online, by email or by post.

Responses will be analysed and used as part of the decision making process, along with a range of other available information and evidence. We will publish a report of this analysis for every consultation. Depending on the nature of the consultation exercise the responses received may:

- indicate the need for policy development or review
- inform the development of a particular policy
- help decisions to be made between alternative policy proposals
- be used to finalise legislation before it is implemented

While details of particular circumstances described in a response to a consultation exercise may usefully inform the policy process, consultation exercises cannot address individual concerns and comments, which should be directed to the relevant public body.

Responding to this Consultation

We are inviting responses to this consultation by 31 March 2022. Please ensure that consultation responses are submitted before the closing date.

Please respond to this consultation using the Scottish Government's consultation hub, [Citizen Space](#). Access and respond to this consultation online [here](#).

You can save and return to your responses while the consultation is still open.

If you are unable to respond using our consultation hub, please complete the Respondent Information Form and send to: OSSPSAconsultation@gov.scot or

Planning and Architecture Division
Scottish Government
2F South Victoria Quay
Edinburgh
EH6 6QQ

Handling your response

All respondents should be aware that the Scottish Government is subject to the provisions of the Freedom of Information (Scotland) Act 2002 and would therefore have to consider any request made to it under the Act for information relating to responses made to this consultation exercise.

If you respond using the consultation hub, you will be directed to the About You page before submitting your response. Please indicate how you wish your response to be handled and, in particular, whether you are content for your response to be published. If you ask for your response not to be published, we will regard it as confidential, and we will treat it accordingly.

If you are unable to respond via Citizen Space, please complete and return the Respondent Information Form included in this document.

To find out how we handle your personal data, please see our [privacy policy](#).

Next steps in the process

Where respondents have given permission for their response to be made public, and after we have checked that they contain no potentially defamatory material, responses will be made available to the public at [Citizen Space](#). If you use the consultation hub to respond, you will receive a copy of your response via email.

Following the closing date, all responses will be analysed and considered along with any other available evidence to help us finalise the regulations. Responses will be published where we have been given permission to do so. An analysis report will also be made available.

Comments and complaints

If you have any comments about how this consultation exercise has been conducted, please send them to the contact address above or at chief.planner@gov.scot.

Consultation to date, and planned

In developing these proposals, the Scottish Government has engaged with stakeholders from across Scotland to understand their views, experiences and thoughts around open space and play opportunities. This collaborative, open stakeholder engagement has been used to shape the provisions in the Draft Regulations and also highlighted points stakeholders would like covered in future guidance.

Core group

In developing these draft proposals on Open Space Strategies (OSS) and Play Sufficiency Assessments (PSA), we have worked closely with a Core Group, consisting of representatives from Greenspace Scotland, Play Scotland, NatureScot and Public Health Scotland.

Working Group

A joint OSSPSA working group, with a range of stakeholders with interests in open space and play, has been convened as a sounding board in preparing the proposals for both sets of Regulations. Members of the Working Group have also taken part in further focussed sessions or breakout workshops to discuss and advise on particular aspects.



Local authorities

Local authorities and Heads of Planning Scotland (HOPS) are represented on the Working Group, via two nominated authorities, offering valuable insights. Additionally, working through the Improvement Service and HOPS, we contacted every local authority in Scotland - and presentations and interactive workshops sessions took place. To date 66 local authority contacts have been involved in our various discussions.

Children and young people

Alongside this public consultation, we intend to specifically engage to seek the views of children and young people from across Scotland. We have been working with Play Scotland and A Place in Childhood to develop an engagement plan. Tailored questionnaires suitable for children and young people will be used to engage either online or in facilitated workshop sessions. We want to gather feedback from a wide range of children and young people representative of those from different age groups, backgrounds, different parts of the country, as well as engaging with groups working with children and young people with additional support needs, and those who are refugees/asylum seekers, LGBTQ, and young carers

We are grateful to the inputs from all those we have spoken to, and thanks go to all those involved to-date.

Introduction

1. Open spaces, green infrastructure and other outdoor places to play are key components in successful placemaking, helping to create pleasant, liveable, healthy and resilient communities. Considering access to quality open space, green infrastructure, and play opportunities as a key part of placemaking can help realise our ambitions for delivering 20 minute neighbourhoods.
2. The new duties on planning authorities¹ to prepare and publish an Open Space Strategy, and to assess the sufficiency of play opportunities in their area for children, were introduced in the [Planning \(Scotland\) Act 2019](#)². It inserted new sections, 3G Open Space Strategy, and 16C Play Sufficiency Assessment into the [Town and Country Planning \(Scotland\) Act 1997](#)³ ("the Act"). Discharging the requirements under these new duties may also be a useful means for authorities to demonstrate how they are responding to the UNCRC⁴ and meeting their duties on Children's Rights.
3. The Act provides details about the purpose of Open Space Strategies (OSS) and Play Sufficiency Assessments (PSA), and gives Scottish Ministers powers to prepare regulations, concerning a range of detailed aspects. This Consultation Paper discusses the proposed provisions for the secondary legislation. The draft Town and Country Planning (Open Space Strategies) (Scotland) Regulations 2022, and draft Town and Country Planning (Play Sufficiency Assessment) (Scotland) Regulations 2022 (the draft Regulations) are set out at the end of this Consultation Paper.
4. Whilst these are two distinct duties, a holistic and integrated approach has been adopted in preparing the proposed provisions on OSS and PSA. It is widely recognised there are clear links and many overlaps between planning for open spaces and play spaces. Children and young people will play in different types of spaces - not just formal play parks - informal/spontaneous play happens in other types of open spaces, in civic space and in the wider public realm. Existing guidance and data, both [Planning Advice Note 65](#)⁵ and the [Ordnance Survey Greenspace Map](#)⁶ already make this link, by including play spaces as a type of open space.
5. This crossover between open space and play provided a strong basis for taking a joint approach in preparing the OSS and PSA draft regulations, and to seek where possible, to align requirements. We hope this aligned approach, will offer efficiency for authorities, in terms of undertaking their audits and assessments of spaces, and in fulfilling their responsibilities in terms of assessing spaces, consulting and publication. Crucially, it should also help to achieve wider

¹ The duty to prepare a play sufficiency assessment applies to all planning authorities. However national park authorities do not have to prepare an Open Space Strategy (the Act notes at 3G(6) that for the purpose of the open space strategy section of the Act, a national park authority is not a planning authority).

² [The Planning \(Scotland\) Act 2019](#)

³ [The Town and Country Planning \(Scotland\) Act 1997](#)

⁴ United Nations Convention on the Rights of the Child

⁵ [Planning Advice Note 65 \(Planning and Open Space\)](#)

⁶ [Greenspace Map](#), Ordnance Survey

benefits from taking a place-based approach when looking at the wider open space resource in an area.

6. There are some legal limits on the scope of what we can, and would want to prescribe in regulations. Therefore, we also intend to bring forward guidance with more details and examples. This Consultation Paper therefore also indicates some of the matters we expect to cover in the guidance.
7. The draft Regulations were prepared in respect of the requirements contained in the Planning Act and do not introduce additional requirements, therefore do not add to the costs previously estimated during the Bill process; ie, at £450,000 respectively across Scotland. [RTPI Scotland's Research Paper 'Financial Implications Of Implementing The Planning \(Scotland\) Act 2019'](#) (August 2019) confirmed that assessment in relation to the costs of preparing an Open Space Strategy and Play Sufficiency Assessment. Based on those average estimates:

$$\begin{aligned} &£450,000 \text{ (OSS)} + £450,000 \text{ (PSA)} = £900,000 \\ &\div 32 \text{ planning authorities} \\ &\div 10 \text{ (10 year review cycle)} \\ &= £2,812.50 \text{ per planning authority per annum to cover both new duties} \end{aligned}$$

Background on the figures and calculations is provided in the draft Business and Regulatory Impact Assessment (BRIA).

8. In addition to the supporting guidance, we can explore how potential digital tools can support planning authorities in undertaking their new duties.

Open Space Strategies

Benefits of Open Space, Green Infrastructure, and Green Networks

9. Our guidance [Green Infrastructure: Design & Placemaking](#)⁷ sets out the benefits of green infrastructure.

Placemaking	<ul style="list-style-type: none"> • reinforcing local landscape character • making places more beautiful, interesting and distinctive • giving places character and a strong identity
Economic	<ul style="list-style-type: none"> • improving the image of a place • helping developers get the most out of the site by combining uses, e.g. open space + SUDS, helping development viability • attracting businesses and inward investors by creating attractive settings • making it cheaper and easier to deal with surface water by keeping it on the surface • saving energy and money for residents and end users
Climate change	<ul style="list-style-type: none"> • reducing CO² emissions by providing non-vehicular travel routes encouraging walking and cycling • providing carbon storage and sequestration in vegetation • providing shelter and protection from extreme weather • managing flood risk: living roofs, large trees and soft landscape areas absorb heavy rainfall • providing for storage of surface water in times of peak flow in SUDS and other water features • cleaning and cooling the air, water and soil, countering the 'heat island' effect of urban areas • saving energy: through using natural rather than engineered solutions • saving energy: living roofs insulate buildings, and large trees provide shade, reducing the need for air conditioning in the summer and raising ambient temperatures in the winter, reduction in heating costs in the winter due to slowing of wind speeds in urban areas
Environmental	<ul style="list-style-type: none"> • reducing pollution through use of SUDS and buffer strips • providing new and linking existing habitats or natural features, to allow species movement • protecting aquatic species through appropriate management of waterside habitats • preventing fragmentation of habitats • allowing diverse habitats to be created which are rich in flora and fauna

⁷ [Green Infrastructure: Design & Placemaking](#)

Community and social	<ul style="list-style-type: none"> • creating green spaces for socialising, interaction and events • more opportunities and places for children to play • providing improved physical connections through green networks to get between places; and to communities, services, friends and family and wider green spaces • providing spaces for practising and promoting horticultural skills • creating opportunities for community participation and volunteering
Health and Well-being	<ul style="list-style-type: none"> • encouraging exercise and physical activity by providing quality green spaces for walking, cycling, sports and play • providing better opportunities for active travel and physical activity • improving mental well-being by providing access to nature and attractive green spaces and breathing spaces • providing opportunities for growing food locally and healthy eating

Link to National Planning Framework 4 (NPF4)

10. The [draft NPF4](#)⁸ sets out a placemaking approach to considering the provision and protection of blue green infrastructure, which covers open space and green networks. Blue and green infrastructure is reflected within the wider universal policy on design, quality and place, and the six qualities of successful places.

“We want our places to be greener, healthier, and more resilient to climate change by supporting and enhancing blue and green infrastructure and providing good quality local opportunities for play and sport.

Networks of blue and green infrastructure are an integral part of successful places. Blue and green infrastructure (such as green spaces, sustainable urban drainage systems, urban trees and green roofs and walls) can offer a wide range of benefits. They can support lifelong health and wellbeing, climate resilience, flood risk management, temperature regulation in urban areas, reduction of air and noise pollution, biodiversity and nature networks, while also supporting good, green jobs.

Accessible, high quality natural and civic spaces can be used by communities for many activities: exercise and recreation, play, sport and connecting with nature.”

(Draft NPF4)

⁸ [National Planning Framework | Transforming Planning](#)

Purpose

11. Section 3G (2) of the Act states “an open space strategy is to set out a strategic framework of the planning authority's policies and proposals as to the development, maintenance and use of green infrastructure in their district, including open spaces and green networks.”
12. As such, open space strategies should provide an effective, corporate means of coordinating the policies of the different council departments with responsibilities for ‘development, maintenance and use’ of green infrastructure including planning, regeneration, estates / property, parks, land services, environment, play, flooding, and active travel.
13. Section 3G (3) sets out an open space strategy must contain:
 - (a) an audit of existing open space provision,
 - (b) an assessment of current and future requirements, and
 - (c) any other matter which the planning authority consider appropriate.

Planning Act's Requirements on the content of Open Space Strategies

Audit of existing open space provision	Strategic framework
Assessment - Current requirements	Policies and Proposals - Development - Maintenance - Use of green infrastructure
Assessment - Future requirements	Any other matter the planning authority considers appropriate

Outcomes based approach

14. Through the OSSPSA Working Group, stakeholders proposed that the regulations should ensure authorities take an outcomes based approach for their open space strategies.

What is an “Outcomes-Based Approach”?

An outcomes-based approach means focusing on what the policy should achieve, rather than inputs and outputs, it encourages organisations to work across traditional boundaries, looking at the bigger picture. It is positive and forward-looking, thinking about what type of places we want in the future, and what they can help achieve.

15. In developing the proposed outcomes in the Draft OSS Regulations we considered other sets of existing outcomes/goals/approaches including:
- UN Sustainable Development Goals;
 - the National Performance Framework’s national outcomes and the the national indicator on access to green and blue space;
 - the 6 Outcomes for the National Planning Framework prescribed in the Planning Act; and
 - other planning policy principles.
16. We also considered equality data on access to quality open space (more details are set out in the accompanying Equalities Impact Assessment (EQIA)). The evidence reveals there are inequalities in access to quality open space:
- there is a marked difference by ethnicity in terms of living within a five 5 minute walk of the nearest greenspace, with just 45% of ethnic minorities reporting living within a 5 min walk, compared to 66% of those from the white ethnic group.
 - people living in the most deprived areas are less likely, than people in less deprived areas, to live within a 5 minute walk of their nearest greenspace.
 - access to outdoor space at home varies by tenure, with homeowners more likely to have access to private gardens.
 - respondents living in the 15% most deprived areas of Scotland were more likely to agree or agree strongly that the quality of their local greenspace has reduced in the past 5 years.
 - women and girls are likely to have greater concerns about their personal safety travelling to / from and within parks and green spaces. Evidence shows that women are under-represented in their use of green space, proportionate to their numbers in society, and that women’s use of urban green space may be influenced by the quality of the green space, and feeling safe, to a greater degree than men’s.
 - fewer people with a limiting long term health condition responded that they live within 5 minutes' walk of their nearest green or blue space compared to those without such a health condition. Evidence also reveals barriers to disabled people’s use and enjoyment of parks and greenspaces.
 - Christians or those having no religion were significantly more likely to live within 5 minutes of a greenspace compared to those belonging to another religion (63% of Christians, compared to 48% of those from other religions).

17. This has led to the development of 6 proposed outcomes which have been discussed with stakeholders, as set out in draft Regulation 3(2):
- (a) improving access to green infrastructure, open space and green networks,
 - (b) creating successful and sustainable places,
 - (c) improving health and wellbeing,
 - (d) advancing equality and eliminating discrimination,
 - (e) securing positive effects for biodiversity, and
 - (f) mitigation of and adaptation to climate change.⁹

improving access to green infrastructure, open space and green networks



creating successful and sustainable places



improving health and wellbeing



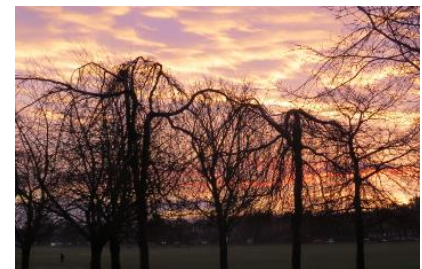
advancing equality and eliminating discrimination



securing positive effects for biodiversity



mitigation of and adaptation to climate change



18. We see the proposed outcomes as a series of principles to inform planning authorities' approach in carrying out the OSS to secure multiple benefits, rather than something they would be assessed against. To that effect, draft Regulation 3(1) requires planning authorities, in preparing their OSS, to take into consideration how the policies in the strategy contribute to the outcomes, and linked to that draft Regulation 3(3), requires planning authorities to include a statement about how their OSS contributes to the outcomes.

19. To support authorities taking a structured approach in considering the outcomes, we may explore how guidance on carrying out audits, and assessing quality, could be linked to the outcomes.

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

⁹ Photo sources / credits: Images 1,3,4 Scottish Government [Programme for Government 20-21](#), Images 2,5,6 Kristen Anderson (SG Planning & Architecture Division)

Scope of Open Space Strategies

20. The Act says that open space strategies are to cover green infrastructure in the planning authority's district, including open spaces and green networks.

Definitions

21. The Act provides definitions of 'green infrastructure', 'open space' and 'green networks', however some of those definitions differed from those included in Scottish Planning Policy. During the course of the Planning Bill an amendment was added to give Ministers the power, to add, amend, or delete any of these definitions.
22. We considered the definitions against various existing definitions from Scottish, UK and international organisations, including definitions from Scottish Planning Policy and considered work on definitions carried out by Glasgow Clyde Valley Green Network Partnership along with Northumbria University. Discussions were held with a sub-group, including representatives from NatureScot, Glasgow Clyde Valley Green Network Partnership and Northumbria University, and with planning authorities and the OSSPSA Working Group on the definitions. Following these discussions we propose in draft Regulation 2, amending the Act's definitions and adding definitions of 'green space' and 'ecosystem services'. The proposed amendments to section 3G(4) of the Act would see the terms defined as follows:

“open space” means space within and on the edge of settlements comprising green space or civic areas such as squares, market places and other paved or hard landscaped areas with a civic function.

“green space” means space which provides a recreational function, an amenity function, or aesthetic value to the public such as areas of -

- (a) grass,
- (b) trees,
- (c) other vegetation,
- (d) water,

but not including agricultural or horticultural land.”

“green infrastructure” means features or spaces within the natural and built environments that provide a range of ecosystem services.

“green networks” means connected areas of green infrastructure and open space, that together form an integrated and multi-functional network.

“ecosystem services” means the benefits people obtain from ecosystems.

Consultation Question 2

Do you agree with the proposed definition of

a) 'open space'	Yes/No/No View	Any Comments
b) 'green space'	Yes/No/No View	Any Comments
c) 'green infrastructure'	Yes/No/No View	Any Comments
d) 'green networks'	Yes/No/No View	Any Comments
e) 'ecosystem services'	Yes/No/No View	Any Comments

Open Space Audit – size threshold

23. The Act requires the OSS to contain an audit of existing open space provision. To provide a degree of consistency and avoid it being too onerous for planning authorities we think it would be useful to set a size threshold in the Regulations, as to the minimum size of spaces that have to be included in the audit. Draft Regulation 4(2) sets out that authorities must audit all open spaces in their area that are 0.2 hectares or greater, and any other smaller spaces that the planning authority considers appropriate to include.
24. The 0.2 ha threshold is proposed as that level is already used in many existing open space audits as well as the [Development Management Procedure \(Scotland\) Regulations 2013](#)¹⁰ (in defining Outdoor Sports Facilities). We also recognise there may be smaller spaces that authorities may wish to include, and so flexibility has been provided to allow these to also be included should the authority wish. This could be where a smaller space is recognised as being of particular value to the community, or makes a significant contribution to particular outcomes e.g. for flood water management purposes or habitat connection purposes, or where the authority has included it in previous audits and wishes the data to continue from its baseline.
25. It is worth emphasising the 0.2 ha threshold relates to 'open space', which is defined as being spaces 'within and on the edge of settlements' (see paragraph 22 on Definitions). We hope this will be helpful to rural and island authorities, by focussing the audit on the spaces that are most valued and accessible to communities.

Consultation Question 3

Do you agree with proposed thresholds for open space audits in Draft Regulation 4(2)?

Yes/No/No View Any comments

¹⁰ [The Town and Country Planning \(Development Management Procedure\) \(Scotland\) Regulations 2013 \(legislation.gov.uk\)](#)

– data collection

26. Existing guidance in [‘Planning and Open Space’ PAN 65](#) set out essential aspects to cover in an open space audit.

“The essential elements of an audit are to record the type, functions, size, condition, location and maintenance requirements of the spaces and to provide some insight on levels of use. The process should also identify community views on the value of open spaces and aspirations for their future role. It may sometimes be useful to record details such as ownership or any history of flooding. Qualitative indicators, for example ranking quality and condition of facilities, can help to establish fitness for purpose.”

(PAN 65 (para 24))

27. Draft Regulation 4(3) requires audits to, for each open space included in the audit, provide, information on its -
- location,
 - size (in hectares), and
 - type
- and Draft Regulation 4(4) requires that this is presented using GIS based digital mapping.

28. **Location and size** – these pieces of information are vital to see the levels of provision, and consider quantity and accessibility. Digital mapping systems (Geographic Information Systems) can show this information, which is available as part of the Ordnance Survey Greenspace dataset.

29. **Type** – we are also proposing open spaces should to be categorised by type. Information about the existing provision of different types of open space, can help in planning to ensure there is a mix of different types of spaces within an area to suit people’s different interests and to help in fulfilling different purposes, linked to the outcomes.

30. PAN 65 sets out a typology of open space types. Planning authorities are accustomed to using the PAN 65 types and providing information, identifying the type of open spaces in their area, as evidenced by the inclusion of type data in authorities previous and current non-statutory open space audits.

31. This typology was expanded as part of the development of the methodology for Scotland’s Greenspace Map, which is now used by Ordnance Survey in the Greenspace Map. Ordnance Survey provides detailed data on types for much of the country (settlements of 500 population or more¹¹).

32. At one of the OSSPSA Working Group workshops it was suggested it would be helpful to look to merge the PAN 65 and Ordnance Survey’s list of types. We are not intending to specify the list of types in the regulations themselves, but to set

¹¹ For the purposes of the Ordnance Survey data - a settlement is defined to be a group of high density postcodes whose combined population rounds to 500 people or more.

them out in guidance. We carried out a comparison exercise that builds on, and updates the PAN 65 types, reflecting the data that is available through Ordnance Survey. The proposed set of types, we intend to cover in guidance, covers the full spectrum of 'green', 'blue' and 'grey' spaces - including green spaces, blue spaces (linked to water), and grey spaces (man-made civic spaces).

Type	Description from PAN 65	Sub-types
Public parks and gardens	Areas of land normally enclosed, designed, constructed, managed and maintained as a public park or garden. These may be owned or managed by community groups.	
Playspace for children and teenagers	Areas providing safe and accessible opportunities for children's play, usually linked to housing areas.	Playspace for children and young people
Private gardens or grounds	Areas of land normally enclosed and associated with a house or institution and reserved for private use.	Private gardens School grounds Institutional grounds
Amenity greenspace	Landscaped areas providing visual amenity or separating different buildings or land uses for environmental, visual or safety reasons and used for a variety of informal or social activities such as sunbathing, picnics or for a kick-about.	Amenity - residential or business Amenity - transport
Sports areas	Large and generally flat areas of grassland or specially designed surfaces, used primarily for designated sports (including playing fields, golf courses, tennis courts and bowling greens) and which are generally bookable.	Playing fields Golf courses Tennis courts Bowling greens Other sports
Green corridors	Routes including canals, river corridors and old railway lines, linking different areas within a town or city as part of a designated and managed network and used for walking, cycling or horse riding, or linking towns and cities to their surrounding countryside or country parks. These may link green spaces together.	Green access routes Riparian routes Canals
Natural/semi-natural greenspaces	Areas of undeveloped or previously developed land with residual natural habitats or which have been planted or colonised by vegetation	Woodland Open semi-natural Inland water Beaches & foreshores

	and wildlife, including woodland and wetland areas.	
Allotments and community growing spaces	Areas of land for growing fruit, vegetables and other plants, either in individual allotments or as a community activity.	Allotments Community growing spaces (including community gardens and community orchards)
Civic space	Squares, streets and waterfront promenades, predominantly of hard landscaping that provide a focus for pedestrian activity and can make connections for people and for wildlife.	Squares Market places Manmade surface - other paved or hard landscaped areas with a civic function
Burial grounds	Includes churchyards and cemeteries.	Religious grounds Cemetery
Other functional greenspace	May be one or more types as required by local circumstances or priorities.	Camping or caravan park

33. By considering ‘type’ which may include natural / semi-natural greenspaces and woodland there is scope for planning authorities to make links between their Open Space Strategy and Forestry and Woodland Strategy (which are also now requirements of the Planning Act).

34. **Other information** – draft Regulation 4(5) sets out other aspects that planning authorities may include information on:

- accessibility to the public;
- functions of open spaces;
- the extent to which open spaces deliver those functions;
- presence of play opportunities; and
- condition.

This was drafted to reflect advice in PAN 65, reflecting established practice. It provides some flexibility for planning authorities, as to whether or not they provide information on these aspects; or prioritise it for particular types of open space.

35. **Accessibility** – we intend to cover in guidance aspects that planning authorities may wish to consider in relation to accessibility. This could cover aspects such as whether the space is well located within the neighbourhood, details of entry points, paths and their quality, transport links (where appropriate), and any barriers that could prevent ease of access and movement whether generally, or by specific groups including disabled people.

36. **Functions** – open spaces may offer different functions such as supporting health and well-being, whether keeping active or a quiet space, supporting active travel, flood prevention, aesthetic value, or for biodiversity. Planning authorities may wish to define functions in different ways, and so we are not intending to set out a prescribed list of functions. Guidance may offer further details about different functions of open spaces, and how these could support achieving the outcomes.

37. **Extent to which the open spaces delivers those functions** – this is essentially about whether the spaces are fit for purpose and in relation to quality. This recognises that the criteria to assess the quality of different types of open spaces eg play parks, compared to amenity space, sports areas, or market places could be quite different, and so it is about looking at how well the spaces delivers for its own particular functions.
38. **Play opportunities** – our discussions with stakeholders have indicated that all of PAN 65’s types of open spaces, could, depending on circumstances, offer opportunities for play. To help join up the open space audit and play sufficiency assessment we are suggesting that through the open space audit planning authorities should look at the presence of play opportunities in their open spaces. Guidance may provide more details about play opportunities and playability, and the sorts of things planning authorities might take into account when considering how play-friendly an open space is (see paragraphs 86-90 under Play Sufficiency Assessments).
39. **Condition** – details about the standard of condition can provide a key insight around the current quality of the space, and can help in re-appraising operational management practice and assessing need for additional/reduction to mowing, litter collection, shrub management, any equipment refurbishment, lighting, etc.
40. We intend to explore in future guidance good practice around **stewardship**. Where appropriate, planning authorities may wish to provide details of any maintenance programme, and identify who is involved in looking after the space whether the Council, residents groups, ‘Friends Of’, or other community groups.

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

– place-based information

41. As part of a place based approach, we believe that as well as the data on individual open spaces, it will be helpful for open space audits to provide information about the overall local authority area and at a locality scale, which is at a more neighbourhood level.

What are “Localities”?

Localities are

- electoral wards or
- areas the Council defines that are no greater than 30,000 population.

42. Draft Regulation 4(6) requires that audits include statements covering the accessibility, quality and quantity for the totality of open spaces and green networks in their area. This is intended to provide a high level picture as to the state of open space in each local authority area.

43. Similarly, draft Regulation 4(7) sets out open space audits are to include a statement, for each locality within their area, describing the open spaces and green networks in that locality’s quality, quantity and accessibility. We believe this localised approach will help support 20 minute neighbourhoods and feed through into place-based local development plans. Some authorities are already doing this in their open space audits, providing settlement statements or accounts.

44. We recognise that the appropriate neighbourhood basis is likely to vary from one planning authority to another and so it should be established locally, by planning authorities. We therefore intend to define in draft Regulation 4(11) that “locality” has the meaning given under section 9(2) of the Community Empowerment (Scotland) Act 2015. This is electoral wards or areas the Council defines that are no greater than 30,000 population – this would provide planning authorities with flexibility when defining localities to match these to their own established localities, which they may already use for community planning.

45. From the evidence in the Interim EQIA we are aware that people from different backgrounds, different groups, and living in different areas may experience different levels of quantity, quality and accessibility to open spaces and play spaces. Requiring planning authorities to consider the ‘quantity’, ‘quality’ and ‘accessibility’ of open space on a locality basis, should help ensure local authorities have information on the amount and quality of open space within local neighbourhoods. This will help authorities to put in place policies and proposals, and to take action to seek to ensure greater equity in access to quality open space.

46. Shared good practice and guidance may offer planning authorities more details about aspects they may wish to include in relation to quantity, quality and accessibility. This may cover points such as:

quantity	<ul style="list-style-type: none"> ○ using GIS to provide information on <ul style="list-style-type: none"> - overall amount of open space - splits by open space type - greenspace per 1000 people
quality	<ul style="list-style-type: none"> ○ We intend to work with partners to update guidance in the Greenspace Quality Guide. The update is likely to: <ol style="list-style-type: none"> a) focus on the outcomes that quality open space, green space and green networks can support, and how to assess whether spaces are contributing to the outcomes b) link to the 6 qualities of successful places set out in National Planning Framework 4 c) cover new issues such as playability and climate change which are not in the current guide d) emphasise the importance of quality in advancing equality and supporting inclusion for different groups including those on low income, women and girls, different race or religious backgrounds, and LGBTQI+.
accessibility	<ul style="list-style-type: none"> ○ link to the national indicator on access to green and blue space within 5 mins walk ○ getting there, <ul style="list-style-type: none"> - the proximity of open spaces to homes - open spaces' location within neighbourhoods - spatial / network analysis - describing any main physical barriers (such as busy roads) or cultural or religious belief barriers that limit access or use by particular groups ○ accessibility within the spaces once there, e.g. <ul style="list-style-type: none"> - in terms of the path network, places to sit and rest - the accessibility and inclusiveness of any facilities and equipment provided within spaces ○ whether open spaces are accessible to all groups, including disabled people, and feel safe and pleasant

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

– engagement on the audit

47. We believe meaningful engagement should be an integral part of the audit. Draft Regulation 4(8) requires that in assessing the criteria in draft Regulations 4(5), 4(6) and 4(7) that planning authorities are to seek the views of, and have regard to, any views expressed by:
- (a) children and young people, as defined by section 16B(14) of the Act,¹²
 - (b) older people,
 - (c) disabled people, as defined by section 16B(14) of the Act,¹³
 - (d) community councils, established under Part 4 of the Local Government (Scotland) Act 1973,
 - (e) the public,
 - (f) key agencies, and
 - (g) any other person or community body which the planning authority considers to be appropriate.
48. Draft Regulation 4(9) provides that where a planning authority's area (whether in full or partially) falls within the boundary of the Central Scotland Green Network national development, the planning authority are to consult the Green Action Trust. The boundary map is available [here](#).
49. Key agencies are defined in draft Regulation 4(10) as meaning,
- (a) Historic Environment Scotland,
 - (b) NatureScot (meaning Scottish Natural Heritage),
 - (c) Sportscotland (meaning the Scottish Sports Council),
 - (d) The Scottish Environment Protection Agency,
 - (e) Scottish Water,
 - (f) Public Health Scotland, and
 - (g) Regional Transport Partnerships (established under section 1 of the Transport (Scotland) Act 2005).
50. This engagement should seek their views and expectations about the existing quality and level of provision of open space, and how well it meets their needs. We are not intending to prescribe how engagement should be done. Planning authorities can use a range of innovative techniques, tailored to local circumstances, to engage with people (including children and young people, residents and users of spaces). Additionally, we intend to explore how digital tools could be developed or promoted to support authorities in carrying out this engagement.

Consultation Question 6

Do you agree with the list of consultees for the open space audit?
Yes/No/No View Any Comments

¹² [mean persons aged 25 or under]

¹³ [means a person who is a disabled person for the purposes of the Equality Act 2010]

Assessment of Current & Future Requirements

51. The Act states at section 3G (3)(b) that an open space strategy must contain an **assessment of current and future requirements**.
52. We think this assessment is an opportunity for planning authorities to consider how well the open space resource in their area helps contribute to the outcomes (in terms of access to open space, place, health and wellbeing, equalities, biodiversity and climate change) and what future changes and requirements might be needed to help deliver on the outcomes. Therefore draft Regulation 5(2) sets out that in assessing current and future requirements, the planning authority is to have regard to how green infrastructure, green networks and open spaces are contributing to the outcomes listed in draft Regulation 3(2).
53. The data and evidence considered as part of the EQIA process, reveals that in considering current and future requirements it is vital that the needs of people from different groups and protected characteristics are taken into account. This provision links to the outcomes including that on advancing equality and eliminating discrimination.
54. Draft Regulation 5(2) also requires that in considering requirements these are considered in respect of each locality and the overall area. Planning authorities should consider how well the open space resource, and provision of different types of space, across their area meets the needs of the community. We also believe that considering requirements on a locality basis, could help in meaningfully identifying local needs and for those needs to be reflected in policies and proposals developed to include in the Open Space Strategy, and in terms of delivery.
55. The assessment of current and future requirements should be informed by engagement. Draft Regulation 5(3) requires planning authorities to seek the views of, and have regard to any views expressed by, those persons contained in draft Regulation 4(8) i.e. those consulted on the audit (see paras 47-49). In practice we would expect these engagement exercises to be done together.
56. The draft Regulations do not prescribe the form this engagement should take, but Ministers expect open engagement, using a range of tools and techniques will be valuable in seeking community views to inform the assessments of current and future needs, and help authorities fulfil their duties around equalities and children's rights.
57. Planning authorities may wish to consider the following aspects when undertaking the assessment of requirements:
 - future requirements (demographics, areas of change / growth areas and their open space needs);
 - needs for a variety of types of open space and green network connections;
 - needs of different interest groups eg, sporting groups/ clubs/ trainers, dog owners, community growing groups and societies;
 - needs of different ages, eg toddlers, children, young people, older people;

- needs and requirements of different characteristics e.g. people with disabilities, ethnic and minority groups, different genders and sexual orientations;
- any relevant legal requirements, for example their statutory duty, under the Community Empowerment Act¹⁴ to provide allotments where there is proven demand, and to consider whether there may be need for more allotments to meet future demands;
- maintenance requirements of different types of space; and
- requirements for green infrastructure to support climate change adaptation and mitigation.

58. We are exploring how map based online engagement tools could help planning authorities to engage with their communities to identify the current and future requirements in relation to open space, green networks and green infrastructure in their neighbourhoods and places.

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

¹⁴ [Community Empowerment \(Scotland\) Act 2015: Allotments.](#)

Open Space Strategy Content

59. The Act, section 3G (2) requires Open Space Strategies, to include **policies and proposals** as to:

- the development,
- maintenance, and
- use

of green infrastructure in the planning authority's district, including open spaces and green networks.

Shared good practice and guidance may offer more ideas and highlight different approaches in developing policies and proposals around these aspects, such as:

development	<ul style="list-style-type: none"> ○ design and quality aspects ○ retrofitting spaces ○ advance or temporary greening ○ creating enhanced connections/green networks
maintenance	<ul style="list-style-type: none"> ○ empowering communities to get involved in management and ongoing maintenance of open spaces ○ fitness for purpose ○ planning conditions and obligations ○ role of management plans for key sites
use	<ul style="list-style-type: none"> ○ multifunctional, and adaptable spaces ○ converting spaces from one types of open space to another eg to provide multiple benefits, or where there is local demand for a particular type of space, which will be used more ○ uses that can support climate change mitigation and adaptation eg renewable technologies within greenspaces eg ground source heat pumps, or to allow for climate change eg flood attenuation ○ design for ease of access and use, particularly for groups such as the elderly, parents with pushchairs and disabled people ○ how good design can help people feel safer using open spaces ○ how use of green networks can encourage walking and cycling and reduce car use, in line with local transport strategies

60. Draft Regulation 3(3) requires Open Space Strategies to include a statement setting out how they are contributing to the outcomes.

61. Draft Regulation 3(4) requires planning authorities to, in the OSS, identify green networks that are wholly or partially within their area, which the planning authority considers to be strategic, by reference to a map. Following on, Draft Regulation 3(5) requires the planning authority to identify how green networks which are wholly or partially in their area may be enhanced.

62. Existing Guidance in the [Greenspace Quality Guide](#) indicates Greenspace Strategies should contain an Action Plan and Monitoring Framework. The draft Regulations have not included this as a legal requirement, but we may highlight that type of approach in guidance, as good practice.

Greenspace Strategy

“The Greenspace Strategy will link the findings of the audit to its strategic context and provide a blue print for working in partnership with other authorities, stakeholders and local communities.

Greenspace strategies should...

- Serve as a statement of political support
- Set a vision for new and improved space
- Contribute to the wider objectives of the council (eg education, health, regeneration, biodiversity)
- Create a policy framework for protecting, enhancing and creating greenspaces
- Enable involvement by community planning partnerships and communities in greenspace management
- Address the surpluses and deficiencies in different types of open space
- Provide the justification for developer contributions
- Contain an Action Plan and Monitoring Framework”.

(Extract from the [Greenspace Quality Guide](#))

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 |
| b) identify strategic green networks? | Yes/No/No View | |
| c) identify how green networks may be enhanced? | Yes/No/No View | |

Consultation on draft Open Space Strategy

63. Draft Regulation 6(1) requires planning authorities to publish a draft open space strategy, and draft Regulation 6(3) requires a minimum 12 week consultation. It is hoped this is an appropriate length of time for those who wish to get involved to express their views. This period should help to involve people who may have less available free time to get involved in planning consultations, including outside other caring and parental responsibilities.
64. Draft Regulation 6(2) also requires consultation on the draft strategy with the consultees set out earlier in the Regulations (see paragraphs 47-49 above) i.e. those that have been engaged on the audit and assessment of requirements.
65. Evidence set out in the EQIA shows that there is a clear relationship between age and internet use, with lower usage rates and accessibility among older people and higher use among younger people. This suggests that using internet and social media are a good way of targeting young people but other ways of reaching and engaging older people may be more effective. In response, the draft OSS Regulations contain a provision at Draft Regulation 6(3) requiring planning authorities to publicise the consultation on their draft OSS using adverts in the local press, to help ensure more older people have the opportunity to offer their views on the draft OSS. The requirement is that the planning authority shall advertise in each of two successive weeks, in one or more newspapers circulating in its area, notice of the publication of the OSS along with details of the date by which any representations must be made to the planning authority.
66. Draft Regulation 6(4) requires the planning authority to have regard to any valid representations from anyone consulted under Draft Regulation 6(2).

Consultation Question 9

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

Yes/No/No View Any Comments

Publication of Open Space Strategy

67. Draft Regulation 7(2) allows the planning authority to modify the draft OSS, after the closing date for representations, to take account of:
- (a) any representations timeously made to them as respects the draft open space strategy (or of any matters arising out of representations so made),
 - (b) any matters arising in consultation, and
 - (c) any minor drafting or technical matters.
68. Draft Regulation 7(3) provides that after, the minimum 12 week consultation period and the closing date for representations and after any modifications have been made, the planning authority is to publish, the Open Space Strategy by electronic means:.

Consultation Question 10

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

Yes/No/No View Any Comments

Review

69. Draft Regulation 8 requires planning authorities to review the open space strategy and to publish an updated open space strategy within the period of 10 years beginning on the date of publication of the most recent open space strategy. The 10 year period links to the 10 year review cycle for local development plans, and is intended to support evidence led plan making.
70. The figures in the Financial Memorandum for the Planning Bill for Open Space Strategies were based on the assumption there would be a 10 year review requirement. (These are covered in more detail in the Business and Regulatory Impact Assessment.)

Consultation Question 11

Do you agree the Regulations should set a 10 year minimum review period for updating open space audits and strategies?

Yes/No/No View Any Comments

Play Sufficiency Assessments

Benefits of Play Opportunities & Link to National Planning Framework 4

71. Draft NPF4¹⁵ contains a new policy on play, which recognises that providing quality opportunities for children of all ages to play will benefit their physical and cognitive development, and uphold their right to engage in play and recreational activities.

“Children experience a range of health, wellbeing and educational benefits from outdoor play, and learning in, and connecting with nature.

Providing quality opportunities for children of all ages to play will benefit their physical and cognitive development, and uphold their right to engage in play and recreational activities.

The planning system should support development that expands opportunities for play in the public realm and in a range of different types of open and green spaces, and which addresses unequal access to play spaces and facilities”

(Extract from Draft NPF4)



Image from '[A Fairer, Greener Scotland Programme for Government 21-22](#)'

Purpose – Link to Local Development Plans

72. The Act sets out in Section 16D(1), the requirement that planning authorities must assess the sufficiency of play opportunities in its area for children in preparing the evidence report for their local development plan.

73. In Section 16D(2), the Act requires that the Scottish Ministers must by regulations make provisions about:

- the form and content of the assessment
- such persons who must be consulted in relation the assessment
- publication of the assessment.

Wider Statutory Context

74. Children’s right to play and relax; freedom of association; and their right for their views to be heard and be given due consideration are enshrined in the UNCRC Articles 31,15 and 12 respectively. Despite the recent UK Supreme Court’s judgement on the United Nations Convention on the Rights of the Child (Incorporation)(Scotland) [Bill](#)¹⁶ that found each of the provisions referred by the UK Law Officers to be outwith the legislative competence of the Scottish Parliament, the commitment to incorporate UNCRC to the maximum extent possible remains. This new duty for the preparation of Play Sufficiency Assessments (PSA) can help local authorities uphold the rights of children.

¹⁵ [National Planning Framework | Transforming Planning](#)

¹⁶ [The United Nations Convention on the Rights of the Child \(Incorporation\)\(Scotland\) Bill](#)

Regulation 2 – Interpretation

75. It is proposed, for clarity and for consistency in application of the regulations, the following definitions are set out in draft Regulation 2.

“the Act” means the Town and Country Planning (Scotland) Act 1997,

“children” means persons under the age of 18 years,

“localities” has the meaning given in section 9(2) of the Community Empowerment (Scotland) Act 2015¹⁷,

“open space” has the meaning given in section 3G(4) of the Act, [This is the same as referred to in paragraph 22 above], and

“play spaces” means outdoor spaces which are accessible by the public and which offer play opportunities for children,

“play sufficiency assessment” means the assessment carried out by a planning authority under section 16D of the Act.

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

Regulation 3 - Form & Content

76. Draft Regulation 3(1) requires that the play sufficiency assessment will take the form of a written report incorporating maps as required in accordance with Regulation 3, setting out the assessment of the sufficiency of play opportunities in its area for children. The intention is to give flexibility for planning authorities to include information that is meaningful locally and for the report to align with other relevant areas of work such as the open space audit and strategy, if the planning authority sees appropriate.

77. Draft Regulations 3(2), 3(3), 3(4) and 3(5) provide details of the requirements with regards to content which must be included in a play sufficiency assessment. Each of the requirements is described and discussed in the following paragraphs 78-97.

78. Identifying play opportunities. Our discussions with stakeholders to-date have indicated the desire for embracing the wider concept of play, both formal and informal; and that it is important, as part of improving children’s health and wellbeing, to support and enable children to play more readily outdoors. This is

¹⁷ [Community Empowerment \(Scotland\) Act 2015 \(legislation.gov.uk\)](http://legislation.gov.uk)

not restricted to playing in play areas or play spaces that are specifically designed and managed for play.

79. Whilst play spaces specifically designed and managed for play are essential in meeting the needs of children to play outdoors, to have fun and to relax, valuable informal play opportunities also exist in many open spaces, including natural spaces, woodlands, urban forestry and in some public realm areas. It is well-recognised that increasing children's contact with nature improves their physical and mental wellbeing, and can build resilience. Allowing children to use the natural world can help foster better understanding of nature and the need to protect and care for the environment.
80. Members of the OSSPSA Working Group suggested it would be helpful if apart from identifying designated play spaces, that planning authorities be required to identify different types of play opportunities, which exist in open spaces as part of their open space audit and include these in the Play Sufficiency Assessment (PSA).
81. Therefore, the proposed draft Regulation 3(2) seeks to require planning authorities to identify play opportunities in two categories of play spaces:
- those play spaces that are specifically for play; and
 - those within areas of open spaces of which the primary function is not play.
82. We also considered whether to require the PSA to identify play opportunities that may exist informally in the public realm, for example, in safer streets / cul-de-sacs around residential areas; or along safe routes to schools and other destinations where children frequently visit, etc. We noted such informal opportunities for play that can be designed into the public realm and encouraged through safer management of streets that prioritise pedestrians uses can promote "door-step play" and "play-on-the-way" that help to keep children active and support their wellbeing.
83. However, we feel these opportunities are too wide-ranging, too varied and less definitive to be prescribed in the regulations for identifying and mapping, therefore decided not to include as a legal requirement. Whilst not prescribed as a requirement for the PSA, this does not preclude local authorities who wish to identify these informal opportunities for play from doing so, if they do exist in their area; and/or are actively promoted locally.
84. This wider concept is supported in planning policy, and examples of good practice could be shared in future.
85. Draft Regulation 3(2) also requires that the two categories of play spaces must be identified by means of a map showing their locations within the local authority area. One of the benefits of the joint approach in bringing forward the OSS and PSA regulations is in the mapping work, so the same GIS-based or equivalent mapping information used in Open Space Audit can be used to map all the play spaces.

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

86. Identifying play opportunities for all ages of children. Playing is an inherent part of a happy childhood, and is vital to children's physical and cognitive development as they grow. In our discussions with stakeholders, it has been clear that to ensure there is adequate provision for outdoor play for children of all ages, the play sufficiency assessment must identify the play opportunities that are suitable for children of different ages. The main objective here is not segregation by ages but to ensure consideration is given to meeting the needs of children of all ages and to seek out where potential exclusion may be present, preventing certain ages of children from accessing suitable play opportunities in their area. To this end, draft Regulation 3(3) requires that the PSA must describe the play opportunities for all ages of children.

87. Whilst the details of how to describe are not specifically prescribed in the regulations, we see this is an assessment of the play provision, in particular in its space design and any play equipment provided in the space and their suitability for children of certain age groups.

88. Age groups. The Working Group recognised that the difference in play activities and preferences between ages is not so significant to require consideration by single ages. However, it is beneficial to take cognisance of children's play needs or play preferences at different stages of their growth and development. Therefore we suggest that identifying play opportunities for all ages may be carried out in respect of age groupings as follows: ages 0-4, 5-11, 12-15 and 16-17.

89. During our workshop discussion with local authorities representatives, most stakeholders agreed with the principles of taking age groupings into consideration in the assessment of play opportunities, and indeed some shared experiences where they have seen under-provision of opportunities for play for certain ages of children.

90. However some questions were raised around how to identify what is suitable for different ages of children. We will continue to work with stakeholders and experts in the play sector to provide guidance in this respect. Amongst the early ideas for including in guidance is around the different characteristics of play, different types and ways to play that are suited and / or preferred by children from different age groups, with reference to Play Scotland's Getting it Right for Play [toolkit](#)¹⁸. The following tables are indicative of some of the information we are considering including in future guidance.

¹⁸ [Play Scotland's Getting it Right for Play Toolkit](#)

Types of Play by Age Groups – indicative tool

Types of Play	Ways to play		0-4	5-11	12-15	16-17
Physical Play	be active	Running, chasing, skipping hopping and jumping	✓	✓	✓	✓
		Swinging	✓	✓	✓	✓
		Sliding	✓	✓		
		Spinning or rocking	✓			
		Ball games like basketball, tennis, football, or rounders	✓	✓	✓	✓
	be adventurous/daring	Balancing or crawling	✓			
		hang upside down, jump from high up, swing high, walk on logs	✓	✓	✓	✓
		Bike or scooter riding	✓	✓	✓	✓
		Roller skating or skateboarding		✓	✓	✓
		Climbing	✓	✓	✓	✓
Creative Play	make things	Sand or soil for digging or making things	✓	✓		
		Building dens or other structures		✓		
		Water for pouring, measuring or splashing	✓			
	be creative	Things or places for pretend play	✓			
		A place to perform, sing or act		✓	✓	✓
		Chalking, drawing or painting	✓	✓	✓	✓
Social Play	hang out	Quiet places to be on your own or with a few close friends		✓	✓	✓
		Places to socialise and meet friends (other boys and girls of different ages and abilities), sit around chat, laugh, shout, (generally hang out)	✓	✓	✓	✓

Characteristics of Play Opportunities by Age Groups – indicative tool

		0-4	5-11	12-15	16-17
Characteristics of Play opportunities	The play place is easy to get to by walking or cycling		✓	✓	✓
	The play place feel safe from traffic, bullies or strange adults		✓	✓	✓
	The play place has natural things to play on or with eg trees, logs, rocks.	✓	✓	✓	✓
	There are things to move around and play with in different ways.	✓	✓	✓	✓
	There is fixed equipment to play on	✓	✓		

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

91. Draft Regulation 3(4) requires that assessments include statements covering the aspects of quality, quantity and accessibility of play opportunities in respect of each locality within the local authority area. This will help provide the sufficiency picture at a neighbourhood scale, to help consider if the everyday play needs and demands of children can be met locally. We believe this localised approach will help support 20 minute neighbourhoods, and in informing place-based local development plans.
92. Draft Regulation 3(5) requires that assessments include statements covering the aspects on quality, quantity and accessibility of play opportunities for the totality of the local authority area. This is intended to provide an overall picture as to the provision of play opportunities in the area. It can help to provide an overview of the distribution of play opportunities across the local authority area and may highlight where certain provisions, for example, inclusive play spaces, can be met between localities or where gaps exist in some localities so local development plans may make new provision.
93. Shared good practice and guidance may offer more details on how to consider, assess and evidence quality, quantity and accessibility. The following paragraphs 94-97 provide a brief outline of potential indicators that planning authorities may wish to consider.
94. **Quality.** Planning authorities may consider quality by demonstrating fitness for purpose in meeting the enjoyment, social and developmental needs of the children; and the contribution the play space makes to the overall quality of the place in which it is located. Indicators may include the quality of design, the quality of the play features and their play values, the standard of maintenance etc. Some form of satisfaction survey feedbacks, or evidence in popularity through frequency of visits may be helpful data in this instance.

95. **Quantity.** Planning authorities may consider quantity by demonstrating if there is adequate provision for every child or a significant proportion of the child population in the area to play freely and to access a range of play opportunities in the community that meet their needs. Potential indicators may be the number of play opportunities in the locality; the level and frequency of usage and if there is evidence of overcrowding etc., bearing in mind these may be play opportunities that are specifically for play as well as those in open spaces and other outdoor spaces.

96. **Accessibility.** Planning authorities may consider and demonstrate the accessibility of play opportunities in their area and in each locality, for children by walking, wheeling and cycling, in terms of distance, safety from vehicular traffic and access conditions; and what measures there are to promote accessibility. Indicators may include; travel distance appropriate to age groups, presence of features such as safe crossings, traffic calming measures, and cycle parking near to access point.

97. Another aspect of accessibility is in relation to physical measures to ensure safe and ease of access by most. Planning authorities may consider aspects of design and specifications that ensure play spaces are accessible by all children and their carers including those with physical disabilities; and the appropriateness of certain play features or equipment etc.

98. **Inclusion.** It is important to improve access to outdoor play opportunities for all children, including those with disabilities so they can play more readily and closer to where they live. The requirement to assess the accessibility of play opportunities will cover a number of key aspects of inclusion that apply generally to all play spaces. There may be further considerations given to the provision of play opportunities that are inclusive and can better meet the needs of children with disabilities and their families. These may include more specialised play features or equipment and the provision of other facilities such as disabled parking, toilets etc. We intend to cover more details on inclusion in future guidance.

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

99. **Demographic data.** Whilst it is not considered appropriate to prescribe as legal requirements the inclusion of specific datasets in the assessment, we think planning authorities should consider presenting key demographic data of the children in their area in its totality, as well as breaking down in respect of each locality to support their sufficiency assessment. Demographic data on the number of children, distribution by ages and by sex and other relevant protected characteristics may be some of the helpful datasets to consider. Such data is readily obtainable from [National Records of Scotland](#).

100. **Deprived communities.** Almost one in four of Scotland's children live in poverty (approximately 230,000). Poverty impacts all areas of a child's life, including nutrition, standard of living, relationships, social and emotional wellbeing, play and education.
101. The [2016 Scottish Household Survey](#)¹⁹ showed that most children had access to play areas in their neighbourhood, but that availability differed according to levels of deprivation within urban areas. Households within the 20% of the most deprived urban areas said they had less access to a natural environment or wooded area in their neighbourhood, compared to the rest of urban areas. Parents living in the 20% most deprived urban areas were also much less likely to think that it was safe for children to travel alone to most play areas. Previous research found that the quality of play areas was poorer in more deprived neighbourhoods, compared to those in the least deprived areas.
102. Our discussions with stakeholders highlight the importance in addressing the different levels of play opportunities experienced by children growing up in more affluent areas as compared to those living in less affluent areas. Planning authorities may wish to consider building in any SIMD data which they consider to be relevant in their assessments. This could help identify whether there are sufficient play opportunities for children in more deprived communities, who may also be less likely to have access to private gardens to play in.
103. **Protected characteristics.** In order to advance equality and eliminate discrimination, we intend to encourage planning authorities to consider and carry out their PSA taking into account the interests of children of all ages, of different gender, with different abilities and from different social, cultural and religion backgrounds including those with protected characteristics. We would encourage stakeholders and planning authorities to share good practice in this respect, in particular in terms of engaging with the relevant groups of children more locally to understand and cater for specific needs profile.

¹⁹ [Scottish Household Survey 2016](#)

Consultation

104. We believe meaningful engagement must be integral to the process of carrying out play sufficiency assessments. We do not intend to specify how the engagement should take place or what methodology must be used, only to emphasise that we expect engagement to take place as part of the assessment process. In our discussions so far, many stakeholders agreed that children themselves know best where they play and what types of play opportunities suit them best, and so should be engaged in ways so that they can properly and meaningfully participate.
105. UNCRC Article 12 states that every child has a right to express their views and have them given due weight in accordance with their age and maturity. Children should be provided with the opportunity to be heard, either directly or through a representative or appropriate body; and their views should be given due consideration. Apart from engaging children, we are also proposing that engagement must extend to include their parents and carers who have their best interest at heart.
106. Draft Regulation 4 requires that in preparing the play sufficiency assessments, planning authorities must consult with:
- (a) children,
 - (b) parents and carers,
 - (c) community councils within the planning authority's area established under Part IV of the Local Government (Scotland) Act 1973,
 - (d) the public, and
 - (e) any other person or community body which the planning authority considers to be appropriate.
107. Consultation could be in the form of facilitated workshops, in-person drop-in events or they may be run digitally with online surveys and other interactive questionnaires etc. What works for urban areas may not work as well for rural and islands communities. Leaving the flexibility for planning authorities to choose the consultation methods that best suit their local circumstances should help to ensure the right method is used to harness maximum feedback and input from local children and communities. Authorities may already have existing engagement practices or be using innovative methods to facilitate involvement of and co-production with children that they can adapt. We also encourage sharing good practice and learning in this respect.

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

Publication

108. Draft Regulation 5 requires the planning authority to publish the play sufficiency assessment by electronic means. This is intended to ensure it is readily available online, minimising the need for travelling to a location to view a printed copy.
109. We would encourage planning authorities to consider the publication of a suitable child friendly version that is more accessible for children.
110. As required by the Act, the completed Play Sufficiency Assessment will form part of the Evidence Report which supports the preparation of the Local Development Plan.

Consultation Question 17

Do you agree with the publication requirement for play sufficiency assessments?
Yes/No/No View

Impact Assessments

111. Published alongside this consultation paper are partial versions of the following documents:

- Business and Regulatory Impact Assessment (BRIA)
- Equalities Impact Assessment (EQIA)
- Children's Rights and Wellbeing Impact Assessment (CRWIA)
- Island Communities Impact Assessment (ICIA)

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.

112. We have also prepared initial assessments screening out requirements to undertake assessments on the Fairer Scotland Duty and Strategic Environmental Assessment. Based on the information we have identified we do not consider there is a requirement to undertake full assessments in these cases.

Consultation Questions 20 and 21

20 Do you agree with the Fairer Scotland Duty screening and our conclusion that full assessment is not required?

Agree/Disagree Any Comments

21 Do you agree with the Strategic Environmental Assessment pre-screenings, that the Open Space Strategies and Play Sufficiency Assessments Regulations are exempt from the Environmental Assessment (Scotland) Act 2005, as the environmental effects are likely to be minimal?

Agree/Disagree Any Comments

[If you consider full assessments are required please suggest any additional sources that could help inform these assessments]

Full List of Consultation Questions

Open Space Strategies Regulations

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

Consultation Question 2

Do you agree with the proposed definition of

- a) 'open space' Yes/No/No View Any Comments
- b) 'green space' Yes/No/No View Any Comments
- c) 'green infrastructure' Yes/No/No View Any Comments
- d) 'green networks' Yes/No/No View Any Comments
- e) 'ecosystem services' Yes/No/No View Any Comments

Consultation Question 3

Do you agree with proposed thresholds for open space audits in Draft Regulation 4(2)?

Yes/No/No View Any Comments

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

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

Consultation Question 6

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

Yes/No/No View Any Comments

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

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

- b) identify strategic green networks? Yes/No/No View
- c) identify how green networks may be enhanced? Yes/No/No View

Consultation Question 9

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

Yes/No/No View Any Comments

Consultation Question 10

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

Yes/No/No View Any Comments

Consultation Question 11

Do you agree the Regulations should set a 10 year minimum review period for updating open space audits and strategies?

Yes/No/No View Any Comments

Play Sufficiency Assessments Regulations

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 opportunities” | Yes/No/No View | Any Comments |

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

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

Consultation Question 15

- a) Do you agree to 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

Consultation Question 16

- a) Do you agree with 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 assessment? Yes/No/No View Any Comments

Consultation Question 17

Do you agree with the publication requirement for play sufficiency assessments?

Yes/No/No View

Impact Assessments

Consultation Question 18

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

Consultation Question 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.

Consultation Question 20

Do you agree with the Fairer Scotland Duty screening and our conclusion that full assessment is not required?

Agree/Disagree Any Comments

Consultation Question 21

Do you agree with the Strategic Environmental Assessment pre-screenings, that the Open Space Strategies and Play Sufficiency Assessments Regulations are exempt from the Environmental Assessment (Scotland) Act 2005, as the environmental effects are likely to be minimal?

Agree/Disagree Any Comments

[If you consider full assessments are required please suggest any additional sources that could help inform these assessments]

Consultation Question 22

Any other comments

2022 No.

TOWN AND COUNTRY PLANNING

**The Town and Country Planning (Open Space Strategies) (Scotland)
Regulations 2022**

Made - - - - - ***
Coming into force - - - - - ***

The Scottish Ministers make the following Regulations in exercise of the powers conferred by section 3G(5) of the Town and Country Planning (Scotland) Act 1997⁽²⁰⁾ and all other powers enabling them to do so.

In accordance with section 275(7BA)⁽²¹⁾ of that Act a draft of this instrument has been laid before and approved by resolution of the Scottish Parliament.

Citation and commencement

1.—(1) These Regulations may be cited as the Town and Country Planning (Scotland) (Open Space Strategies) (Scotland) Regulations 2022 and come into force on [].

(2) In these Regulations “the Act” means the Town and Country Planning (Scotland) Act 1997.

Amendment of section 3G(4) of the Town and Country Planning (Scotland) Act 1997

2.—(1) Section 3G(4) (open space strategy) is amended in accordance with this regulation.

(2) Before the definition of “green infrastructure” insert—

““ecosystem services” means the benefits people obtain from ecosystems,”.

(3) In the definition of “green infrastructure”—

(a) for “of the” substitute “or spaces within the”, and

(b) for “and social benefits” substitute “services”.

(4) In the definition of “green networks” at the end insert “, that together form an integrated and multi-functional network”.

(5) After the definition of “green networks” insert—

““green space” means space which provides a recreational function, an amenity function, or aesthetic value to the public such as areas of—

(a) grass,

⁽²⁰⁾ 1997 c.8. Section 3G was inserted by section 3 of the Planning (Scotland) Act 2019 (asp 13) and was commenced on 8 November 2019 by regulation 2 and schedule 1 of S.S.I. 2019/314 for the purpose of making regulations.

⁽²¹⁾ Section 275(7BA) was inserted by paragraph 9(2) of schedule 2 of the Planning (Scotland) Act 2019.

- (b) trees,
- (c) other vegetation,
- (d) water,

but not including agricultural or horticultural land,”

(6) In the definition of “open space” for “green infrastructure” substitute “green space”.

Preparation of open space strategy

3.—(1) In preparing an open space strategy under section 3G of the Act, a planning authority must take into consideration how the policies and proposals in the strategy contribute to the outcomes in paragraph (2).

(2) The outcomes referred to in paragraph (1) are—

- (a) improving access to green infrastructure, open space and green networks,
- (b) creating successful and sustainable places,
- (c) improving health and wellbeing,
- (d) advancing equality and eliminating discrimination,
- (e) securing positive effects for biodiversity, and
- (f) mitigation of and adaptation to climate change.

(3) The planning authority are to include a statement as to how the open space strategy contributes to the outcomes in paragraph (2).

(4) The planning authority are to identify green networks wholly or partially within their area, which the planning authority consider to be strategic, by reference to a map.

(5) The planning authority are to identify how green networks which are wholly or partially within their area may be enhanced.

Audit of existing open space provision

4.—(1) The requirement for a planning authority to carry out an audit of existing open space provision under section 3G(3)(a) of the Act is to be carried out in accordance with this regulation.

(2) The requirement to carry out an audit of existing open space provision is in regard to—

- (a) all open spaces within the planning authority’s area which are 0.2 hectares or greater, and
- (b) any other open spaces less than 0.2 hectares which the planning authority consider to be relevant.

(3) In respect of every open space under paragraph (2), the audit of existing open space provision is to include information on the—

- (a) type of the open space,
- (b) location of the open space, and
- (c) size in hectares of the open space.

(4) The information required by paragraph (3) is to be presented using GIS based digital mapping.

(5) In respect of open spaces within their area, the planning authority may include information on—

- (a) accessibility to the public,
- (b) functions of open spaces,
- (c) the extent to which open spaces deliver those functions,
- (d) presence of play opportunities in open spaces, and
- (e) the condition of open spaces.

(6) The planning authority’s audit of existing open space provision is to include a statement of—

- (a) accessibility,
- (b) quality, and
- (c) quantity,

for the totality of the open spaces in their area.

(7) The planning authority's audit of existing open space provision is to include a statement of—

- (a) accessibility,
- (b) quality, and
- (c) quantity,

for the totality of the open spaces in respect of each locality within their area.

(8) In assessing the criteria in paragraphs (5), (6) and (7), the planning authority are to seek the views of, and have regard to any views expressed by—

- (a) children and young people as defined by section 16B(14) of the Act,
- (b) older people,
- (c) disabled people as defined by section 16B(14) of the Act,
- (d) key agencies,
- (e) community councils established under Part 4 of the Local Government (Scotland) Act 1973⁽²²⁾,
- (f) the public, and
- (g) any other person or community body which the planning authority considers to be appropriate.

(9) In assessing the criteria in paragraphs (5), (6) and (7), a planning authority for an area all or part of which falls within the boundary identified by the Central Scotland Green Network⁽²³⁾ are to consult the Green Action Trust.

(10) In paragraph (8), “key agencies” means—

- (a) Historic Environment Scotland,
- (b) NatureScot (meaning Scottish Natural Heritage),
- (c) Sportscotland (meaning the Scottish Sports Council),
- (d) The Scottish Environment Protection Agency,
- (e) Scottish Water,
- (f) Public Health Scotland, and
- (g) Regional Transport Partnerships established under section 1 of the Transport (Scotland) Act 2005⁽²⁴⁾.

(11) In this regulation, “locality” has the meaning given section 9(2) of the Community Empowerment (Scotland) Act 2015⁽²⁵⁾.

Assessment of current and future requirements

5.—(1) The requirement for a planning authority to carry out an assessment of current and future requirements under section 3G(3)(b) of the Act shall be carried out in accordance with this regulation.

(2) In assessing current and future requirements, the planning authority is to have regard to how green infrastructure, open space and green networks are contributing to the outcomes listed in regulation 3(2) in respect of—

- (a) each locality in their area, and
- (b) their area overall.

(3) In carrying out an assessment of current and future requirements under section 3G(3)(b) of the Act, the planning authority are to seek the views of, and have regard to any views expressed by those persons contained in regulation 4(8).

⁽²²⁾ 1973 c.65.

⁽²³⁾ The boundary map is available at www.centalscotlandgreennetwork.org/resources/data

⁽²⁴⁾ 2005 asp 12.

⁽²⁵⁾ 2015 asp 6.

Consultation on draft open space strategy

- 6.—(1) The planning authority are to publish a draft open space strategy
- (2) The planning authority are to consult as respects the draft open space strategy those persons listed in regulation 4(8).
- (3) The planning authority shall advertise in each of two successive weeks, in one or more newspapers circulating in its area, notice of the publication under paragraph (1) specifying a date (being a date not less than 12 weeks after the date of publication) by which any representations with respect to the draft open space strategy must be made to the planning authority.
- (4) The planning authority must have regard to any valid representations received from anyone consulted under paragraph (2).

Publication of open space strategy

- 7.—(1) The open space strategy is to be published in accordance with this regulation.
- (2) After the date specified by virtue of regulation 6(3) the planning authority may modify the draft open space strategy so as to take account of—
- (a) any representations timeously made to them as respects the draft open space strategy (or of any matters arising out of representations so made),
 - (b) any matters arising in consultation under regulation 6, and
 - (c) any minor drafting or technical matters.
- (3) After the date specified by virtue of regulation 6(3) and after any modifications made under paragraph (2), the planning authority are to publish by electronic means the open space strategy.

Review of open space strategies

- 8.—(1) The planning authority are to review the open space strategy and to publish an updated open space strategy within the period of 10 years beginning on the date of publication of the most recent open space strategy.

2022 No.

TOWN AND COUNTRY PLANNING

**The Town and Country Planning (Play Sufficiency Assessment)
(Scotland) Regulations 2022**

<i>Made</i>	- - - -	***
<i>Laid before the Scottish Parliament</i>		***
<i>Coming into force</i>	- -	***

The Scottish Ministers make the following Regulations in exercise of the powers conferred by section 16D(2) of the Town and Country Planning (Scotland) Act 1997⁽²⁶⁾ and all other powers enabling them to do so.

Citation and commencement

1. These Regulations may be cited as the Town and Country Planning (Play Sufficiency Assessment) (Scotland) Regulations 2022 and come into force on [].

Interpretation

2. In these Regulations—

“the Act” means the Town and Country Planning (Scotland) Act 1997,

“children” means persons under the age of 18 years,

“locality” has the meaning given in section 9(2) of the Community Empowerment (Scotland) Act 2015⁽²⁷⁾,

“open space” has the meaning given in section 3G(4) of the Act,

“play spaces” means outdoor spaces which are accessible by the public and which offer play opportunities for children,

“play sufficiency assessment” means the assessment carried out by a planning authority under section 16D of the Act.

Form and content of play sufficiency assessment

3.—(1) The play sufficiency assessment must be a written report, incorporating maps as required in accordance with this regulation, setting out the assessment required under section 16D of the Act by a planning authority of the sufficiency of play opportunities in its area for children.

(2) The play sufficiency assessment must show, by means of a map, the location of play spaces for children within its area and is to identify those play spaces—

⁽²⁶⁾ c. 8. Section 16D was inserted by section 7 of the Planning (Scotland) Act 2019 (asp 13) and was commenced on 8 November 2019 by regulation 2 and schedule 1 of S.S.I. 2019/314 for the purpose of making regulations.

⁽²⁷⁾ 2015 asp 6.

- (a) which are specifically for play, and
 - (b) which are within areas of open space and not specifically for play.
- (3) The play sufficiency assessment must describe the play opportunities for all ages of children.
- (4) The play sufficiency assessment must, in respect of each locality within the planning authority's area, include statements as regards the overall—
- (a) quality,
 - (b) quantity, and
 - (c) accessibility
- of play opportunities in that locality.
- (5) The play sufficiency assessment must include statements as regards the overall—
- (a) quality,
 - (b) quantity, and
 - (c) accessibility
- of play opportunities in the planning authority's area.

Consultation

4. In preparing the play sufficiency assessment the planning authority must consult—

- (a) children,
- (b) parents and carers,
- (c) community councils within the planning authority's area established under Part IV of the Local Government (Scotland) Act 1973⁽²⁸⁾,
- (d) the public, and
- (e) any other person or community body which the planning authority considers to be appropriate.

Publication

5. The planning authority are to publish the play sufficiency assessment by electronic means

⁽²⁸⁾ c. 65.

With Thanks to,

The Core Group

Greenspace Scotland, Julie Procter (Chair)
Nature Scot, Ivan Clark and Mareike Moeller-Holtkamp
Play Scotland, Marguerite Hunter Blair and Cherie Morgan
NHS Health Scotland, Ali Macdonald

The OSSPSA Working Group and other contributors

A Place In Childhood (APIC), Jenny Wood and Jamie Hamilton
Architecture & Design Scotland, Gerard O'Brien
Falkirk Council, Danny Thallon
Forestry Scotland, Sasha Laing and Hugh Mcnish
Glasgow City Council, Gillian Dick
Glasgow Clyde Valley Green Network Partnership, Max Hislop, Ally Corbett
Green Action Trust, Deryck Irvine and Emilie Wadsworth
Heads of Planning Scotland, Gillian Dick, Danny Thallon
Improvement Service, Irene Beautyman
Inspiring Scotland, Rachel Cowper
Learning Through Landscape, Matt Robinson
NHS Health Scotland, Elizabeth Richardson
Northumbria University, Prof Alister Scott, NERC Knowledge Exchange Fellow
(Green Infrastructure)
SEPA, Wendy Campbell
SportScotland, Lorraine Jones

Local authorities

Aberdeen City Council, Aftab Majeed, Donna Laing and Katherine Hossack
Aberdeenshire Council, Piers Blaxter
Angus Council, Jutta Scharnberger and Frances Loffreda
Argyll & Bute Council, Matthew Watkiss
Cairngorms National Park Authority, Dan Harris
City of Edinburgh Council, Alex Laidler
Clackmannanshire Council, Michael Nicol
Dumfries & Galloway Council, Wendy Macleod
Dundee City Council, Andy Mulholland and Alison Abercrombie
East Dunbartonshire Council, Jennifer Wiggins and Niall Urquhart
East Lothian Council, Marek Mackowiak
Falkirk Council, Danny Thallon
Fife Council, Kevin O'Kane, David Sheach and Ramsay Duff
Glasgow City Council, Gillian Dick
Inverclyde Council, Ash Hamilton
Midlothian Council, Emma Hay
North Ayrshire Council, Thom Ledingham
North Lanarkshire Council, Gordon Laing and Ross Dunn
Perth & Kinross Council, Brenda Murray, Bea Nichol, Susan Johnstone and Hajnalka Biro
Renfrewshire Council, Heather Ennis and Steve Edwards
South Ayrshire, Zena Clark
South Lanarkshire Council, Sheila Alderson
Stirling Council, Mark Laird and Richard Callender
West Dunbartonshire Council, Matthew Spurway
Improvement Service, Trevor Moffat and Susan Rintoul



Scottish Government
Riaghaltas na h-Alba
gov.scot

© Crown copyright 2021

OGL

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit nationalarchives.gov.uk/doc/open-government-licence/version/3 or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: psi@nationalarchives.gsi.gov.uk.

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at www.gov.scot

Any enquiries regarding this publication should be sent to us at

The Scottish Government
St Andrew's House
Edinburgh
EH1 3DG

ISBN: 978-1-80201-843-1 (web only)

Published by The Scottish Government, December 2021

Produced for The Scottish Government by APS Group Scotland, 21 Tennant Street, Edinburgh EH6 5NA
PPDAS995718 (12/21)

W W W . g o v . s c o t