

## Response ID ANON-W1U6-JGV3-D

Submitted to Open Space Strategies and Play Sufficiency Assessments  
Submitted on 2022-03-10 11:05:37

### Page 1 - Open Space Strategies

1. (a) Do you agree with the idea of promoting an outcomes-based approach through the Open Space Strategies Regulations?

Yes

Any comments?:

1. (b) Do you agree with the suggested outcomes?

Yes

Any comments?:

2 Do you agree with the proposed definition of:

2. - (a) 'open space':

No view

2. - (b) 'green space':

No

2. - (c) 'green infrastructure':

No

2. - (d) 'green networks':

Yes

2. - (e) 'ecosystem services':

No view

(a) 'open space' definition - Any comments?:

no comments

(b) 'green space' definition - Any comments?:

Green spaces can and do provide recreational function, an amenity function, or aesthetic value to the public but they can also, importantly, support natural ecosystems and are of value because of that too. The definition would be more complete by acknowledging green space as space for nature as well as space for people to access nature. With this in mind the list of areas that qualify as green space should include more remote and rural green space in addition to urban green space. We question whether open, upland as well as wild coastal areas should be included in the list as these are valued recreational areas, fulfil and amenity and an aesthetic function for people in Scotland as well as important spaces for nature.

(c) 'green infrastructure' definition - Any comments?:

Overall agree but suggest add in wording about people and nature e.g. 'connected areas of green infrastructure and open space for people and nature, that together form an integrated and multi-functional network.'

(d) 'green networks' definition - Any comments?:

Overall agree. Care needs to be taken that this definition fits with a definition for Nature Networks that is provided in the NPF4 draft. Arguably, we need both green networks and nature networks (which the draft NPF4 has). We also need to acknowledge the overlap in reality and in policy. Ideally all green spaces would function for people and nature. A green network would be no exception to that general principle.

(e) 'ecosystem services' definition - Any comments?:

no comments

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

No view

Any comments?:

4. (a) Do you agree with suggested information to include about each open space (location, size and type)?

No

Any comments?:

It is not clear whether wilder open space (within the definition of 'open space' provided) has been captured by the list of types. To make this clearer, the list could refer to 'wild places' or it could reference habitats associated with a spectrum of wild places, which could be within the open space definition. Examples could include moorland, peatlands, heathland, wetlands.

4. (b) Do you agree with Regulation 4(5) on the other information planning authorities may include in the audit?

Yes

Any comments?:

Given the biodiversity crisis and the extent to which we have lost nature from open spaces, we suggest that guidance on Regulation 4(5) encourages Local Authorities to identify how open spaces are functioning for nature. This will vary depending on the habitats present, the soil type, the proximity to sites designated for nature and the species that use or live in the space. It may also reveal that an open space is not functioning for nature. Formally identifying that a space is not functioning for nature presents an opportunity to consider how the space could function for nature.

5. (a) Do you agree with the suggested approach to require locality level place-based information?

No view

Any comments?:

5. (b) Do you agree with the three high level aspects that should be covered in these statements 'accessibility', 'quantity' and 'quality'?

No view

Any comments?:

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

Yes

Any comments?:

As young people are a target audience to engage, we suggest working with YoungScot and organisations representing play, learning and teaching outdoors such as Education Scotland and Outdoor and Woodland Learning Scotland in addition to the key agencies listed.

7. (a) Do you agree the Assessment of Current and Future Requirements should have regard to how open spaces and green networks in the area are contributing to the outcomes?

Yes

Any comments?:

When undertaking the assessment of future changes and requirements to deliver on the outcomes listed we recommend that Planning Authorities consider how well a space is functioning for nature and how wild the open space is. One consideration as part of an assessment could be the type of open space – e.g. is it natural or semi natural green space that is colonised by vegetation and wildlife?

7. (b) Do you agree with the proposed provisions for the Assessment of Current and Future Requirements for the assessment to be informed by engagement with the groups set out?

Yes

Any comments?:

In addition we suggest engaging youth groups and youth representation groups e.g. YoungScot.

8. (a) Do you agree Open Space Strategies should include a statement setting out how they contribute to the outcomes?

Yes

Any comments?:

8. (b) Do you agree Open Space Strategies should identify strategic green networks?

Yes

Any comments?:

8. (c) Do you agree Open Space Strategies should identify how green networks may be enhanced?

Yes

Any comments?:

In addition to identifying how green networks can be enhanced, Open Space Strategies should reference the need for evaluation and monitoring of how green networks have been, or are being, enhanced.

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

Yes

Any comments?:

The consultation requirements should include the requirement for Local Authorities to promote the consultation during the consultation period and to do so in different ways to try and engage as wide an audience as possible. We also recommend that an Open Spaces Strategy consultation should include and consider the Learning for Sustainability agenda (Lfs in Scottish Government; and Learning for Sustainability Scotland).

10 Do you agree with the proposed publication requirements for Open Space Strategies?

No view

Any comments?:

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

No view

Any comments?:

## Page 2 - Play Sufficiency Assessments

12 Do you agree with the proposed definitions?

12. - (a) "children":

No

12. - (b) "localities":

Yes

12. - (c) "open space":

Yes

12. - (d) "play spaces":

No

(a) "children" definition - Any comments?:

A broadening of language to 'children and young people' would be more inclusive especially for the older age groupings of 12-15 and 16-17.

(b) "localities" definition - Any comments?:

(c) "open space" definition - Any comments?:

(d) "play spaces" definition - Any comments?:

A broadening of the term to something like 'play and recreation spaces' would be more inclusive especially for older age groups who may not relate to 'play'.

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

Any comments?:

These should relate to other open space types especially amenity green space, green corridors, sports areas, natural and semi natural greenspace, growing spaces and civic spaces.

14 Do you agree with the proposed requirement to assess play opportunities in respect of their suitability by age groups?

Yes

Any comments?:

More emphasis on natural play features (rather than fixed equipment) would be welcomed as they can provide open ended play opportunities which are appropriate for multiple age groups. Building dens and other structures can be important hang out/social spaces for 12 + age group when play provision for this grouping can often be under-represented. There is a need to emphasise the opportunities to enhance biodiversity in play and recreation spaces. This is a way to maximise outcomes for wild places and people. Enhancing biodiversity in play and recreation areas will enhance children and young peoples' connection with nature, promote health and wellbeing and enable them to take an active part in caring for their local environment.

15. (a) Do you agree with the proposed three aspects of assessment - 'accessibility', 'quantity' and 'quality'?

Yes

Any comments?:

There should be a requirement to include SIMD data and protected characteristics built into the assessment to tackle inequalities.

15. (b) Do you agree to provide them in written statements in respect of the totality of the local authority area and at each locality level?

Yes

Any comments?:

16. (a) Do you agree to the requirement to consult as part of the process of carrying out the play sufficiency assessment?

Yes

Any comments?:

We would welcome more more emphasis or a local authority requirement on facilitating involvement and co-production of the Play Sufficiency Assessment with children and young people.

16. (b) Do you agree with the proposed list of consultees on play sufficiency assessments?

No views

Any comments?:

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

Yes

Any comments?:

We would welcome a local authority requirement to produce a child or a young person friendly version of the Play Sufficiency Assessment.

### Page 3 - Impact Assessments

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

Please add your comments here::

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?

Please add your comments here:

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

Not Answered

Please add your comments here::

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?

Not Answered

Please add your comments here::

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

22 Any other comments?

Please detail below::

## About you

What is your name?

Name:

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What is your email address?

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Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

John Muir Trust

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

We will share your response internally with other Scottish Government policy teams who may be addressing the issues you discuss. They may wish to contact you again in the future, but we require your permission to do so. Are you content for Scottish Government to contact you again in relation to this consultation exercise?

Yes

I confirm that I have read the privacy policy and consent to the data I provide being used as set out in the policy.

I consent

## Evaluation

Please help us improve our consultations by answering the questions below. (Responses to the evaluation will not be published.)

Matrix 1 - How satisfied were you with this consultation?:

Very satisfied

Please enter comments here.:

Matrix 1 - How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?:

Very satisfied

Please enter comments here.: