

Briefing 22-10

February 2022

## **Open Space Strategies and Play Sufficiency Assessments**

To: All Chief Executives, Main Contacts and APSE Contacts in Scotland. For information only to England, Northern Ireland and Wales

### **Key Issues:**

The Scottish Government has released a new consultation on Open Space Strategies and Play Sufficiency Assessments. The consultation seeks views on draft regulations and discusses the proposed provisions.

The consultation closes on 31 March 2022 and can be completed by [clicking here](#).

## **1.0 Background**

With the introduction of The Planning (Scotland) Act 2019, new duties were placed upon planning authorities to publish Open Space Strategies to assess how sufficient play opportunities were in their area; this can be a way for authorities to demonstrate how they are meeting their duties on children's rights. This includes not just formal play parks but also play in other types of open spaces. The strategy itself should provide a means of coordinating the policies of different council departments (such as land services, parks, environment, active travel, regeneration, property, etc) and give a strategic framework to policies and proposals. The full list of draft proposals can be viewed by [clicking here](#), and are summarised below.

The 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.

It was proposed that an outcomes based approach should be taken to open space strategies in order to encourage working across traditional boundaries and looking at the wider picture. As a result of discussions with stakeholders on other existing sets of goals and the inequalities of access to quality open spaces, 6 proposed outcomes were reached:

- (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.

The open space strategy should also contain an audit of the existing open space provision, with a size threshold for the size of spaces that should be included in the audit (0.2 ha is the proposed level). As well as the location and size of spaces, it is also proposed to categorise open spaces by type as a way of determining which areas suit people's different interests. The draft regulations also suggest that planning authorities may wish to 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; and
- e. condition.

It was also suggested that it would be helpful for open space audits to include information on the overall local authority area and localities (electoral wards / areas with no greater than a 30,000 population). The draft regulations also require statements on the accessibility, quality and quantity of open spaces, as well as a description for each locality. The Scottish Government believe that this requirement should provide a means for

planning authorities to consider open spaces on a locality basis and ensure local authorities have information on the amount and quality of open space within local neighbourhoods.

The strategy must also contain an assessment of current and future requirements to allow planning authorities the opportunity to consider what changes may be required in the future to deliver on outcomes such as health and wellbeing, biodiversity, climate change and access to open space. The draft regulations also require planning authorities to engage and consult with appropriate local stakeholders. This has a required minimum 12 week consultation period. In order to receive a wide range of responses from all age groups, adverts should be placed in the local press as well as publicised online, in order to target both the young and old.

Open Space Strategies should also include policies and proposals as to the development, maintenance and use of open spaces and green networks within their areas. Strategic green networks should be identified with reference to a map, and information on how these networks could be enhanced should be included.

The draft regulations recognise the importance of providing quality play opportunities for children of all ages and how this benefits both their physical and cognitive development. The sufficiency of play opportunities should be assessed within the plans, which should take the form of a written report incorporating maps, with meaningful local information on the available opportunities. This should also include informal play opportunities in natural open spaces such as woodlands and public realm areas; the draft regulations suggest that play opportunities could be identified as such, with a separation between play spaces specifically for play, and open spaces which can be used for play. Play opportunities should be identified by the following age groups: 0-4, 5-11, 12-15 and 16-17. Statements on the quality, quantity and accessibility of play opportunities should be given in the strategy alongside inclusion, to ensure children with disabilities are also considered.

Open Space Strategies should be reviewed and published in a minimum 10 year cycle.

## **2.0 Consultation Questions**

The consultation is quite extensive and contains 22 multi-part questions split up into 3 sections – Open Space Strategies, Play Sufficiency Assessments and Impact Assessments on the proposed requirements stated above in section 1.0. The full list of questions can be viewed by [clicking here](#).

### 3.0 APSE Comment

APSE welcomes this consultation from the Scottish Government which considers both the needs of communities and biodiversity. Having these open space strategies is another way for local planning authorities to demonstrate the value that the work of local authorities brings to their local areas. However, consideration should be given to any funding and resource requirements, particularly given the budget challenges already facing local authorities. APSE has undertaken a great deal of research into the quality of parks and the need for their proper financing. Our [State of UK Public Parks 2021 report](#) highlighted the decline in funding with a total of £690 million lost over the past decade. Our report '[Bystanders or innovators? How local authorities can use place making to drive the green recovery](#)', is another useful read on this topic; the report suggests that a national enabling strategy is required to place local government at the heart of a post-pandemic recovery, suggesting that its role in place making will be the core driver to a green recovery. Those and many other reports are available as free PDFs on the [APSE website](#). APSE also runs a [Parks, Grounds and Streets advisory group](#) which is free to attend for APSE members where issues such as open spaces and play sufficiency are a regular topic. APSE's Performance Networks service also provides the opportunity for local authorities across the UK to benchmark and undertake trend analysis for [Parks and Open Spaces](#) including costs, productivity and customer satisfaction.

**Reminder: APSE has set up a COVID-19 Information Hub to deal with frontline service issues as they arise, ensuring greater resilience and learning between each other during this difficult time. You can access this hub by clicking [here](#) and you can also join our WhatsApp Support Network by clicking [here](#).**

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