

Play Scotland initially submitted a joint response to the Places, People and Planning Review with Youthlink Scotland.

Play Scotland would like to make two points in response to the Position Statement consultation.

Background from Analysis of Written Evidence

There should be a review and refreshed role for Statutory Consultees within a modernised planning system, whereby they are positive participants and contributors to the place-making, not simply passive observers or objectors (page 64)

A proposal was made that Statutory Consultees should be enabled to participate on the basis that they play a constructive role around the delivery of national planning policy. By implication the weight attached to their role would be diminished were they not to do so. • A proposal was made to **enlarge the basis of Statutory Consultees** beyond geographical **communities to communities of interest**, including across administrative borders and even to those who self-declare an interest.

Involving children and young people to ensure that their needs are at the heart of all our planning decisions and that we involve them fully in the decisions that impact upon their lives, was advocated by a national strategy group. • The **creation of a statutory consultee on behalf of children's perspectives**, such as Play Scotland or the Children and Young People's Commissioner for Scotland, was proposed as a means to give this perspective more input to policy and placemaking. • The use of the **Place Standard tool** was advocated as a means to engage communities in purposeful dialogue to ensure they are able to participate meaningfully and shape local place-making. (page 72)

From the Position statement:

Aligning community planning and spatial planning. We suggested that this can be achieved by introducing a requirement for development plans to take account of wider community planning and can be supported through future guidance. • Most consultees are broadly supportive of this proposal. • Some have suggested that a two-way dialogue or genuine partnership between community planning and spatial planning would be needed. • Others feel that the local development plan should have primacy. • There are also concerns about any such requirement slowing down the local development plan preparation process

We continue to recognise this as a priority for securing stronger collaboration and alignment with a focus on positive outcomes for places. We are minded to propose a statutory link between development planning and community planning in the Planning Bill.

Do you have any views on the proposals contained within the position statement? There is no need to restate views already expressed in relation to Places, People and Planning as these have been, and will continue to be, taken into account as we move towards finalising the actions to be taken.

1. **The Play Strategy for Scotland** aims to support Local Authorities to establish a baseline from which they can measure satisfaction levels and deliver improvements in play opportunities. Such tools already exist in Getting it Right for Play (Play Scotland) and the Place Standard NHS (Health) Scotland. This could be referenced in guidance to accompany any new duties.

*Outcome: All children and young people have sufficient time and space (physical and social) for playing within their community and have contact with nature in their everyday lives. Play is valued, encouraged and supported in communities, as are providers of community play opportunities such as out of school care, playgroups, therapeutic and specialist settings and community champions of play. Impact: More children will be playing more often in outdoor places including green space, parks and streets. **Careful consideration will***

have been given to the planning and design of public spaces, and children and young people will be able to find clean, safe and welcoming spaces to play and gather near their homes where they are not considered a nuisance by others in their communities.(page 24 Play strategy Action Plan 2013)

2. **Play Scotland** is working with a number of Community Planning Partnerships to deliver Getting it Right for Play tools and the Place Standard tool. However there is still a sense that retaining spaces and places for children and families to play in around where they live is not a top priority.

We welcome the suggestion to **enlarge the basis of Statutory Consultees to communities of interest/ children's perspectives**. It is critical that due consideration is given to a new Statutory Consultee that can take full account of any proposed removal of informal play and recreation places and spaces in local communities, some of which are ideally placed for children and families but may also have a high economic value. See for example the Rotterdam Norms:

- All public space is potentially a play area: children play everywhere not just on playgrounds and at sport facilities
- Playable liveable environments – wide pavements, play streets, communal areas
- Improving play opportunities where there are shortages of spaces for play
- Weigh up interests between need for play spaces and other planning interests