

Scottish Government Planning Guidance: Play Sufficiency Assessment

December 2023

Contents

| | |
|--|----|
| Introduction | 3 |
| About the guidance..... | 3 |
| Why play is important | 4 |
| National planning policy context | 4 |
| Local development planning context..... | 5 |
| Overview of the Play Sufficiency Assessment..... | 6 |
| Legislative requirements..... | 6 |
| Objectives of the PSA Regulations..... | 7 |
| Preparing the Play Sufficiency Assessment | 7 |
| Understanding the definitions | 7 |
| The PSA report..... | 8 |
| The Content of PSAs | 8 |
| ○ Identifying play spaces..... | 8 |
| ○ Mapping | 10 |
| ○ Assessment of sufficiency | 10 |
| ○ Play opportunities for all children | 14 |
| ○ Other base data | 18 |
| ○ Engagement and consultation..... | 19 |
| ○ Publication..... | 20 |
| Glossary and acronyms..... | 21 |

Introduction

About the guidance

1. This guidance supports the implementation of the [Town and Country Planning \(Play Sufficiency Assessment\) \(Scotland\) Regulations 2023](#)¹, which came into force on 19 May 2023.
2. The guidance has been prepared based on the information and learning gathered through working with relevant stakeholders. This includes working group meetings and wider stakeholder workshops which involved local authorities, during the preparation of the draft Regulations. Much of the content in the guidance was included in the [consultation paper](#)², published on 17 December 2021.
3. Children and young people's views were also gathered on issues relevant to the draft Regulations via tailored questionnaires which were completed online and/or in facilitated workshops.
4. The consultation responses gathered in the public consultation and from children and young people were taken into account in the revision and finalisation of the Play Sufficiency Assessment (PSA) Regulations. Proportionality was an important consideration in finalising the Regulations. Provisions were adjusted and simplified to avoid unnecessary or disproportionate resource implications, and to provide a clear and proportionate statutory framework for the preparation of PSAs.
5. The purpose of this guidance is to help explain and/or expand, where appropriate, the intention of the provisions in the Regulations. It includes suggestions for potential considerations, indicators and possible data sources that may be helpful to use in the preparation of PSAs.
6. The guidance is not exhaustive, nor it is intended to be prescriptive. In preparing PSAs, it will be important to consider local context and circumstances, thus tailoring the information gathering, engagement and assessment to suit. Whilst there are positive opportunities arising from the new duty, it will be important for planning authorities to undertake their functions in a proportionate way given the many areas that development plans seek to address.
7. To drive better practice and improvement, planning authorities and those involved in carrying out PSAs are encouraged to share their experience and good practice as the process is embedded in development planning across Scotland.

¹ [Town and Country Planning \(Play Sufficiency Assessment\) \(Scotland\) Regulations 2023](#)

² [Consultation on Open Space Strategies and Play Sufficiency Assessment Regulations](#)

Why play is important

8. The Scottish Government wants Scotland to be the best place to grow up. [Scotland's Play Strategy](#)³ sets out a vision which values play as a life-enhancing daily experience for all our children and young people – in the home, in nurseries and schools and in the community.
9. Through play, children and young people can explore the world around them in a creative and engaging way. Research shows that children experience a range of health, wellbeing, developmental and educational benefits from outdoor play, and through learning in and connecting with nature.
10. According to the [United Nations Convention on the Rights of the Child \(UNCRC\) General Comment 17](#)⁴, play is a fundamental and vital dimension of the pleasure of childhood, as well as an essential component of physical, social, cognitive, emotional and spiritual development.
11. Ensuring children's access to play and engaging children in the planning system upholds their right to play and relax; their right to freedom of association and their right for their views to be heard and be given due consideration under UNCRC Articles 31, 15 and 12 respectively.

National planning policy context

12. [National Planning Framework 4](#)⁵ (NPF4) Policy 21: Play, recreation and sport, sets out that local development plans (LDPs) should identify sites for sports, play and outdoor recreation for people of all ages, and support development proposals that protect, enhance or improve children's access to play.
13. NPF4 recognises that many people, including children and young people, need better places to support their lifelong health and wellbeing and build their future resilience. It seeks to improve the quality of life of people across Scotland through facilitating places that enable local living, including providing access to playgrounds and green or blue spaces where there are opportunities for relaxation and informal play.
14. Ensuring all children have access to good quality play opportunities will deliver the policy objectives contained in NPF4 and help local authorities to uphold the rights of children.

³ [Play Strategy for Scotland: Our Vision, 2013](#)

⁴ [UNCRC General comment No 17, 2013](#)

⁵ [National Planning Framework 4, Scottish Government, 2023](#)

Local development planning context

15. Planning authorities are required by law to prepare an LDP for all parts of their district. LDPs must be prepared at intervals of no more than 10 years, or when required by the Scottish Ministers.
16. There are three key stages in local development planning, comprising the following processes as shown in Figure 1:

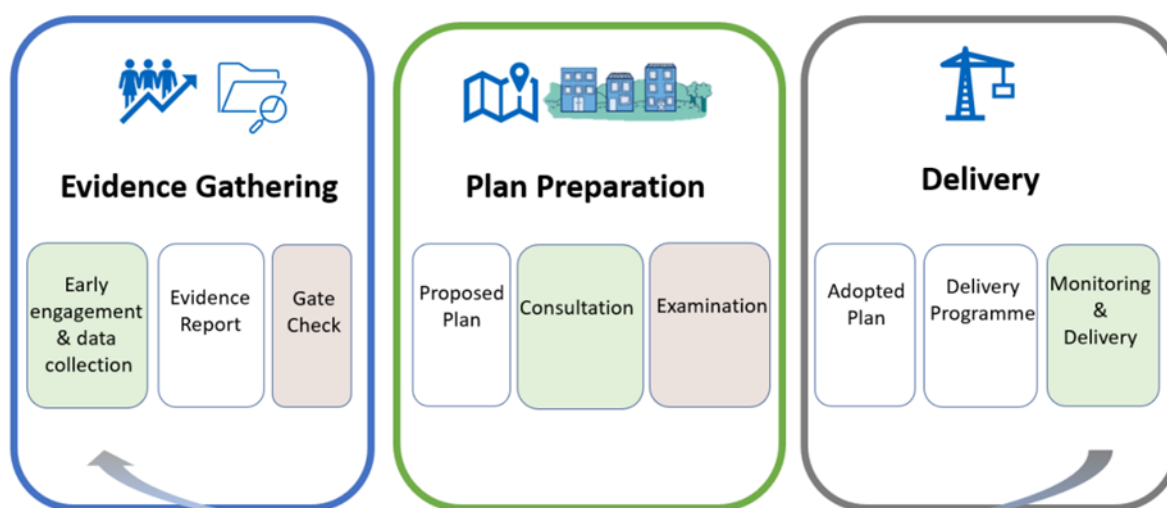


Figure 1: LDP Process Overview (source: [Local development planning guidance](#)⁶)

17. The preparation of a PSA forms part of the Stage 1 processes as part of early engagement and data collection. It is intended to help ensure there is a good understanding of the sufficiency of both formal and informal play spaces for children across planning authority areas. The evidence gathered in the PSA should be used to inform provisions for play in the preparation of LDPs.
18. The legislative duty requires that a planning authority must assess the sufficiency of play opportunities in its area for children in preparing an evidence report. The Evidence Report will be subject to independent assessment at the 'Gate Check', which will check that there is a sound evidence base on which to prepare an LDP.
19. Further details on the process for preparing and aims and objectives of LDPs are included in the [Development planning regulations](#)⁷ and the accompanying [Local development planning guidance](#)⁸.

⁶ [Figure 4, LDP Process Overview, Local Development Plan Guidance 2023, Scottish Government](#)

⁷ [Town and Country Planning \(Development Planning\) \(Scotland\) Regulations 2023](#)

⁸ [Local Development Planning Guidance](#)

Overview of the Play Sufficiency Assessment

Legislative requirements

20. [The Planning \(Scotland\) Act 2019](#)⁹ inserted a new section 16D Play Sufficiency Assessment into the [Town and Country Planning \(Scotland\) Act 1997](#)¹⁰ ("the Act") with regard to local development plans. Section 16D sets out that a planning authority must assess the sufficiency of play opportunities for children in its area in preparing an evidence report.
21. Section 16D(2) of the Act states that Scottish Ministers must by regulations make provisions about – a) the form and content of the assessment, b) such persons who must be consulted in relation to the assessment, c) publication of the assessment.
22. [The Town and Country Planning \(Play Sufficiency Assessment\) \(Scotland\) Regulations 2023](#)¹¹ ('the Regulations') form part of a wider package of measures on planning reform, and the PSA must be prepared as part of preparing an evidence report that informs the preparation of a LDP, under the new [development planning regulations](#)¹².
23. The Regulations are standalone regulations for the purposes of the preparation of PSAs. There are no transitional arrangements required.
24. The implementation of the Regulations is supported by this guidance and future sharing of good practice and experience amongst planning authorities and those who are involved in preparing PSAs or using PSAs to inform their work.
25. It is the responsibility of the planning authority to prepare the PSA report, but in doing so, they should collaborate with stakeholders. These may include those from within the local or national park authority, such as from relevant departments/service teams, and external stakeholders, including the play sector and practitioners.
26. The Regulations require engagement with specific people, organisations, or groups, including children and their parents and carers, during the process of assessment. Further detail is given at paragraph 83 of this guidance.
27. The PSA must be completed as part of preparing an evidence report. This will help ensure there is good evidence on the sufficiency of play opportunities for children across the planning authority areas to inform the preparation of the LDP.
28. It is the responsibility of the individual planning authority to publish its completed PSA report by digital means as required by the Regulations.

⁹ [Planning \(Scotland\) Act 2019](#)

¹⁰ [Town and Country Planning \(Scotland\) Act 1997](#)

¹¹ [Town and Country Planning \(Play Sufficiency Assessment\) \(Scotland\) Regulations 2023](#)

¹² [Town and Country Planning \(Development Planning\) \(Scotland\) Regulations 2023](#)

Objectives of the PSA Regulations

29. Open spaces and other outdoor spaces provide many play opportunities for children and for relaxation and recreation. However, various research and survey data highlight a number of challenges relating to children's use of open spaces and play spaces, including those of accessibility, use, quality, inclusion; and that disparities exist for children with disabilities and also as a result of cultural and socio-economic backgrounds.
30. Spatial planning and the design and management of our natural and built environment can be effective enablers to encourage, promote and facilitate the provision of and access to outdoor play opportunities for children and young people as part of their daily lives.
31. The statutory duty for the preparation of PSAs exists to ensure there is good quality evidence on the sufficiency of both outdoor formal and informal play spaces for children in their local neighbourhoods and in their local authority areas. The PSA will inform understanding of where children can play outdoors locally, how good are the play spaces, and if the play spaces meet children's and young people's needs.
32. The completed PSA report will inform the preparation of LDPs, allowing planning authorities to plan for appropriate provision of new or enhanced play opportunities in their areas.
33. The PSA should be prepared using an outcomes-based approach and inform opportunities to access outdoor play and recreation for all children; to advance equality, eliminate discrimination and to deliver improved health and wellbeing outcomes for children and young people across Scotland.

Preparing the Play Sufficiency Assessment

Understanding the definitions

34. For the purpose of the PSA Regulations, "children" means persons under the age of 18 years. This is in line with the definition under Article 1 of UNCRC, an internationally mandated children's rights framework. Given the wider policy connection that outdoor play may have with education and health, it is considered appropriate to adopt the age range of 0-17, therefore including babies, children, and teenagers from birth right up to completing formal primary and secondary school education in Scotland.
35. Play opportunities for children are wide ranging and cover different settings. However, given the spatial planning context and the statutory link between PSAs and LDPs, the play opportunities relevant for the purpose of these Regulations are defined as "play spaces" that are outdoor, and are accessible by the public, and which offer play opportunities for children.

36. Play spaces are further defined in two categories, namely “formal play spaces” and “informal play spaces”. The distinction between these two categories of play opportunities recognises the significance of both in their respective contribution to children’s outdoor play experiences, and allows different requirements to be prescribed respectively. The requirements around these two categories of play spaces and the link with “open space” are further discussed in this guidance under the section titled “Identifying play spaces”.
37. “Locality” as defined for the purpose of preparing PSAs, provides the necessary flexibility in allowing planning authorities to define the size and scale of the settlement or neighbourhood basis that is suitable for their own area.

The PSA report

38. The PSA is to be presented in the form of a written report, incorporating maps as required by the Regulations.
39. The PSA report must contain the following:
- Information on formal play spaces in the planning authority area, both by locality and in the totality of the planning authority area. The locations of formal play spaces must be shown on a map.
 - Information on informal play spaces in the planning authority area, which have been identified as relevant by the planning authority or by children. The locations of informal play spaces do not require to be mapped.
 - Statements setting out the assessment of the sufficiency of play opportunities with regard to quality, quantity, and accessibility, both by locality and in the totality of the planning authority area.
40. There is flexibility for planning authorities to include information that is meaningful locally and for the PSA report to align with other relevant areas of work such as the open space audit and/or open space strategy, play parks strategy, etc., if the planning authority sees these as appropriate.

The Content of PSAs

○ Identifying play spaces

41. In identifying where children play, it is important to remember that children’s opportunities for playing outdoors should not be restricted to playing only in formal play spaces, which are more commonly referred to as play areas, playgrounds or play parks. It is widely recognised that to meaningfully enable children and young people to play outdoors more readily and to play in their communities, the planning system should promote and support provision for a variety of both formal and informal play spaces.
42. Formal play spaces are essential in meeting the needs of children to play outdoors. However, valuable informal opportunities for play also exist in many open spaces, including natural spaces, woodlands, urban forestry and in some

public realm areas, including in quiet, low traffic streets, where children can have fun, relax, and socialise as part of their everyday lives.

43. Research also shows that increasing children's contact with nature improves their physical and mental wellbeing and can build resilience. Allowing children to use the natural world and to connect with nature can help foster better understanding of nature and the need to protect and care for the environment.

"No one will protect what they don't care about, and no one will care about what they have never experienced."

Sir David Attenborough

44. Planning authorities are encouraged, in their PSAs, to identify and take cognisance of the different open spaces and public realm areas such as civic squares or quiet streets, where informal play opportunities exist or can be supported.
45. It is the responsibility of the planning authority to identify and map the formal play spaces in its area as required by the Regulations, to clearly show their locations within each locality and in the overall local authority area.
46. It is expected that, at the minimum level, all council-owned formal play spaces would be included. As all local authorities own and manage playgrounds and play parks, it is expected that the information already exists within wider council departments and that planning functions will collaborate with other relevant teams within the council to obtain relevant information and support the assessment process.
47. Non local authority owned formal or informal play spaces can be included in the PSA, especially if they are identified by the planning authority or by children and young people or their parents and carers as relevant/significant play opportunities in the area.
48. It is recognised that informal play spaces can be too wide-ranging, too varied, and less definitive for accurate mapping to be prescribed by regulations. For some authorities, identifying and mapping all informal play spaces may be a significant task with disproportionate resource implications. For these reasons, the requirement for mapping has not been prescribed, leaving the flexibility for individual planning authorities to gauge what are relevant informal play opportunities in the area and how they wish to include them in their PSAs.
49. Whilst not prescribed as a legal requirement for the PSA, this does not preclude planning authorities who wish to identify and/or map the informal play spaces from doing so, if such informal play spaces are relevant/significant in their area and are regularly used by children and young people; and if they are actively promoted as such locally. Planning authorities are expected to consider suitable ways of identifying the relevant informal play spaces, including engaging with local children and young people to identify those informal play spaces that are important to them.

50. In areas where gaps in provision of formal play spaces are identified, planning authorities are expected to record such gaps in the PSA report, to be taken into consideration in preparation of the LDP. Planning authorities may wish to consider where informal play opportunities may exist in other open space types in an area where a gap has been identified, and consider if such informal play opportunities could be adequate in meeting the needs of the children in the area; even in cases where feedback was not forthcoming from local children and young people.

51. To include non local authority owned play opportunities, or to include other open space types as informal play opportunities in PSAs, planning authorities should be reasonably satisfied that these are spaces that are publicly accessible and the management of these spaces can support informal play and recreation for children and young people. This may be informed by the local authority's open space audit, parks strategy or other relevant agencies' or landowners' management policies and/or strategies.

○ Mapping

52. **Mapping.** The mapping information should be presented using Geographic Information Systems (GIS) based digital mapping, which is available as part of the [Ordnance Survey Greenspace Map](#)¹³ or equivalent mapping information. GIS-based information is widely used by planning authorities in their previous or current non-statutory open space audits. The formal play space as defined in the context of the Regulations is an identifiable open space typology included in the dataset.

53. As part of carrying out open space audits, planning authorities may already be accustomed to identifying different types of open spaces in their area. Some of these open spaces may have informal opportunities for outdoor play or may be identified by children and young people as informal play spaces. Such open space audits may be used as base information from which to extract specific data on formal and informal play spaces for inclusion in PSA reports.

54. Planning authorities are encouraged to consider the possibility of aligning the PSA work with the open space audit and the preparation of an open space strategy. This alignment may help efficiency, achieving the wider benefits from adopting a joined-up, place-based approach, including using the same GIS-based or equivalent mapping information and in identifying informal play opportunities in open spaces.

○ Assessment of sufficiency

55. In carrying out PSAs, the assessment of sufficiency is not restricted only to the quantitative dimension. Qualitative dimensions, such as the context, design and physical conditions of the play opportunities and the play experiences offered to children and young people; as well as their accessibility by children and young people and their parents and carers, must contribute towards the measure of

¹³ [Greenspace Map](#), Ordnance Survey

sufficiency. To this end, the Regulations require planning authorities to consider sufficiency by assessing play opportunities in three aspects, namely, quality, quantity, and accessibility.

56. Whilst play spaces may be assessed individually, it is required by the Regulations that the PSAs must provide statements of sufficiency at both locality level and in the overall planning authority area. This is to ensure that planning authorities take a place-based approach and gather place-based evidence to meaningfully inform the preparation of LDPs.
57. In this way, PSAs will provide an overall picture as to the provision of play opportunities in a locality or a neighbourhood area; showing clearly where children can play and relax locally. As well as the local information, PSAs will also provide an overview of the distribution of play opportunities across the planning authority area, which may highlight where particular or more specialised provisions, for example, inclusive play spaces, skate parks or cycle parks, are provided; and where children may therefore prefer to play.
58. The localised approach helps to provide good understanding on sufficiency of play opportunities at a neighbourhood or community level, to help consider if the everyday play needs and demands of children can be met locally, thus, truly supporting children and young people to be able to live well locally.
59. By assessing sufficiency across the planning authority area as a whole, PSAs will provide good data and evidence on the sufficiency of provision and the distribution of play opportunities for children across a larger geography. This can help to identify any gaps in provision of certain types of play or for children of certain ages or backgrounds. It can also highlight any disparity in provision between localities within the planning authority area, which planning authorities may seek to remedy by promoting suitable new provision or enhancing existing provision within the LDP.
60. The Regulations do not prescribe how to assess and evidence quality, quantity, and accessibility. There is therefore flexibility in creating/selecting the relevant criteria or indicators that are most relevant and suitable in individual planning authority areas. As a guide, Tables 1, 2 and 3 suggest the types of consideration/evidence and potential indicators that may help to demonstrate each of the three aspects. These are not exhaustive nor intended to be prescriptive.

Table 1: Assessment aspect – Quality (indicative only)

| Quality | |
|--|---|
| consideration/evidence to demonstrate | potential indicators |
| <ul style="list-style-type: none"> • good design/play features; • functional/fit for purpose; • meet needs and provide enjoyment; • pleasant/welcoming space for children of different ages and ability; and parents & carers as appropriate; • contribution to the surrounding environment in design and visual appearance; • management and maintenance standards. | <ul style="list-style-type: none"> • fitness for purpose, meeting the enjoyment, social and developmental needs of children; • well-managed, well-maintained, including clean, in good order; useable at all times; • contribution to the overall quality of the place, with reference to Scottish Government's Creating Places¹⁴ and the 6 qualities of successful places described in Annex D¹⁵ linked to NPF4 Policy 14: Design, quality and place¹⁶; • space design and quality of play features and their play values¹⁷; • satisfaction survey, evidence of popularity, frequency and length of visits. |

Table 2: Assessment aspect – Quantity (indicative only)

| Quantity | |
|---|--|
| consideration/evidence to demonstrate | potential indicators |
| <ul style="list-style-type: none"> • every child in the area is able to play outdoors freely and locally, within reasonable walking, wheeling, or cycling distance from their home; • there are options of a range of play opportunities in the locality that meet their different needs; • all/most play spaces are of good sizes and are not over-crowded. | <ul style="list-style-type: none"> • number/proportion of children in the area who can access play spaces, and within reasonable distance; • number and types of play opportunities in the locality/across the planning authority area; • range of play opportunities suitable for different ages and/or providing different play experiences; • level and frequency of usage and if there is evidence of overcrowding, bearing in mind these may include both formal and informal play spaces; • there is choice for all children. |

¹⁴ [Creating Places: A policy statement on architecture and place for Scotland, 2013](#)

¹⁵ [NPF4 Annex D – Six Qualities of Successful Places](#)

¹⁶ [National Planning Framework 4](#)

¹⁷ [Free to Play - A guide to creating accessible and inclusive public play spaces, p. 9, Section 2, Affordance and play value](#)

Table 3: Assessment aspect – Accessibility (indicative only)

| Accessibility | |
|--|---|
| consideration/evidence to demonstrate | potential indicators |
| <ul style="list-style-type: none"> • good physical accessibility for children by walking, wheeling and cycling, in terms of distance, safety from vehicular traffic, access conditions, etc.; • there are play opportunities in the locality/planning authority area that meet the needs of children from diverse communities, cultural, social and economic backgrounds; • there are play opportunities that are accessible for children with disabilities and protected characteristics; • all/most play spaces are accessible during different times of the day and all days of the week. | <ul style="list-style-type: none"> • reach by walking, wheeling and cycling, in terms of distance, safety from vehicular traffic; • presence of measures to promote accessibility, including travel distance appropriate to age groups, safe crossings, traffic calming measures, and cycle parking, public transport, close to bus stops, etc.; • signage and local information to promote access; • well-lit, and overlooked for passive surveillance; • access conditions, suitable for wheelchair users and parents/carers with prams; • presence of a range of play features, including play features that are accessible to wheelchair users; • presence of supporting features such as seating, shelter, water fountains, toilet/changing facilities, disabled parking, internet access, etc. |

61. Access conditions are physical attributes that influence accessibility. Planning authorities may consider aspects of design and specifications for ground surface/path finishes, and their gradients that facilitate ease of access by children and their carers, including those with physical disabilities. Where possible, incorporating play features or play equipment that are wheelchair accessible will support inclusive play. The provision of seating adjacent to the play spaces can be a positive feature that enhances accessibility.

“Inclusive play makes opportunities available for all children, regardless of disabilities and background. We believe children should all have the chance to play together.”

Inclusive play spaces are spaces where children of all abilities can play together, with play features that give them a rich range of physical, sensory and social experiences.

Sensory Trust, UK

62. The requirement to assess accessibility of play opportunities as prescribed in the PSA Regulations covers a number of key aspects that apply generally to all play spaces, and which contribute towards inclusion. When assessing ‘accessibility’ of a play space, consideration should be given to the location, how well the play

space is connected to the communities it serves, the demographics of local children, the design, the play features, and what other additional facilities are provided for the play space to be considered as an accessible/inclusive play space. For example, a play space that can better meet the needs of disabled children and their families may include more specialised play features or equipment and the provision of other facilities such as disabled parking space, toilets/changing facilities, etc.

63. There may be various practical challenges that prevent some existing play spaces from being fully inclusive. The barriers may include physical limitations of existing play spaces and potential disproportionate resource implications on local authorities if certain measures were to be applied. However, planning authorities are encouraged to observe good practice in enabling inclusive play, to advance equality and improve diversity where possible. They are encouraged to take steps through their LDPs and other relevant local strategies to actively improve the provision and access to outdoor play for all children, including disabled children and children with protected characteristics.

64. Informed by the PSA report when preparing LDPs, it is important that planning authorities understand the barriers that are faced by local children from different socio-economic backgrounds and with protected characteristics, including, in particular, age, disability, sex, race and religion or belief. Planning authorities should actively seek ways to remove those barriers and improve children's opportunities to more readily access good quality and inclusive open spaces and play spaces close to where they live.

- Play opportunities for all children

65. **Protected characteristics.** To support advancing equality and eliminating discrimination, planning authorities are encouraged to carry out their PSAs taking into account the interests of children of all ages, of different gender, with different abilities and from different social, cultural, racial and religion backgrounds along with other protected characteristics. Understanding the demographic profile of the child population of the area will help inform planning authorities of where there is a need to reach out to and engage with those relevant groups of children to understand any specific needs and identify gaps in provision.

66. **Age.** Playing is an inherent part of a happy childhood and is vital to children's physical and cognitive development as they grow. Children's play needs and preferences have co-relations with their physical and mental development stages as they grow up. It is important to ensure there is adequate provision of play opportunities locally, and in the totality of the planning authority area, which is suitable for children of different ages, to either play together or play independently.

67. When considering play spaces suitable for different age groups of children, the objective is not to provide play spaces that segregate children by their age. The objective is to ensure the provision for play spaces in a locality and in the overall planning authority area meets 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. For example, one common observation is around the under-provision of opportunities for play amongst older children or teenagers, whose play preference may be to hang out and socialise in groups or to chill/relax on their own or in small company.

68. Although in taking a proportionate approach to finalising the Regulations, the Scottish Government has opted to omit a legal requirement to identify and assess the suitability of play spaces by age group, ensuring there is adequate provision of outdoor play for children of all ages should remain a consideration of the PSA. It is at the discretion of planning authorities to choose how to evidence this aspect and to present the information in a way that is suitable to their purpose and on the level of granularity of analysis that they wish to include in their PSA.
69. **Age groups.** When considering play preferences by ages of children, it may be helpful to note that the difference in play activities and preferences between ages may not be so significant to require consideration by single ages. It may be beneficial to take cognisance of children's play needs or play preferences at different stages of their growth and development and consider in respect of age groupings, for example: ages 0-4, 5-11, 12-15 and 16-17, or by developmental groupings, for example: nursery-aged, primary-aged, and secondary-aged.
70. As a suggestion around how to identify what is suitable for different ages of children, adaptation has been made to Play Scotland's Getting it Right for Play [toolkit](#)¹⁸ to illustrate the different characteristics of play, different types and ways to play that are suited and/or preferred by children of different age groups. Tables 4 and 5 signpost information planning authorities may use in this respect.

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

Table 4: 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) | ✓ | ✓ | ✓ | ✓ |

Table 5: 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 feels safe from traffic, bullies or strange adults | | ✓ | ✓ | ✓ |
| | The play place has natural things to play on or with e.g. trees, logs, rocks | ✓ | ✓ | ✓ | ✓ |
| | There are things to move around and play with in different ways | ✓ | ✓ | ✓ | ✓ |
| | There is fixed equipment to play on | ✓ | ✓ | | |

71. Other considerations on suitability of play spaces by ages may be around the space design, including:

- the presence of different ground levels;
- enclosures;
- the presence of trees and other soft landscaping;
- outdoor furniture, such as picnic tables or seating; and
- any other play feature and/or equipment provided in the space.

72. **Girls.** Some research in UK has highlighted concerns around the restriction placed on girls in play spaces in comparison to boys. [Make Space for Girls](#)¹⁹ highlighted how girls can be crowded out of parks and equipment, how their needs are mostly ignored and that parks, play equipment and public spaces for older children and teenagers are often designed for the default male. Provision for play is almost entirely in terms of skate parks, BMX tracks, football pitches and multi-use games areas (MUGAs), which are used almost entirely by boys. These findings are reinforced by the publication of their [Parkwatch: The Results](#)²⁰, a citizen science project undertaken in May 2023.

“88% of the teenagers using the facilities were boys.

The vast majority of what is provided ‘for teenagers’ in parks consists of skateparks, BMX tracks or MUGAs (Multi-Use Games Areas, i.e. fenced pitches for football or basketball).”

Make Space for Girls, Parkwatch, May 2023

73. **Disabled children.** The [Report](#)²¹ by The Play Strategy Implementation Group on the review of inclusive play in Scotland, highlights that children with disabilities are often excluded from leisure and play activities with their peers. This is often as a result of multiple barriers and intersections between poverty, disability, disadvantage, and inaccessible environments. The lack of suitable physical access conditions for wheelchair users in playgrounds and/or natural places such

¹⁹ [Make Space for Girls](#)

²⁰ [Parkwatch: The Results, May 2023, Make Space for Girls](#)

²¹ [Scotland’s Play Strategy: Playing with quality and equality: a review of inclusive play in Scotland](#)

as woodlands, forests and the countryside, the lack of suitable toilet/changing facilities and the lack of wheelchair accessible play equipment are some of the barriers to disabled children being able to enjoy play.

74. **Disadvantaged children.** It is estimated that almost one in four of Scotland's children were living in relative poverty after housing costs in 2019-22 (approximately 250,000 children)²². Poverty impacts all areas of a child's life, including nutrition, standard of living, relationships, social and emotional wellbeing, play and education.
 75. The [2016 Scottish Household Survey](#)²³ 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% most deprived urban areas said they had less access to a natural environment or wooded area in their neighbourhood, compared to all other 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. The quality of play opportunities tends to be poorer in more deprived neighbourhoods, compared to those in the least deprived areas.
 76. Awareness and understanding around different play needs or play preferences of children of different ages, sexes and with other protected characteristics, including disabled children and children from disadvantaged backgrounds, may help planning authorities in their assessment of sufficiency and preparation of their statements of sufficiency for including in the PSA reports.
 77. Drawing on national research findings can help with benchmarking for comparison with local data and evidence to inform future provisions in LDPs and in identifying opportunities for new or enhanced play spaces that are more integrated, more inclusive, and able to cater for a wider range of needs and play experiences.
- Other base data
78. **Demographic data.** Whilst it is not considered appropriate to prescribe as legal requirements the inclusion of specific datasets in the assessment, 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 age and by sex and other relevant protected characteristics may be some of the helpful datasets to form the basis of the assessment. Such data is readily obtainable from [National Records of Scotland](#)²⁴.
 79. **Deprived communities.** It is important to address disparity in access to play opportunities, including access to good quality open spaces, experienced by children growing up in more affluent areas as compared to those living in less

²² [Poverty and Income Inequality in Scotland 2019-22, Scottish Government](#)

²³ [Scottish Household Survey 2016](#)

²⁴ [National Records of Scotland](#)

affluent areas. Planning authorities may wish to consider building in [SIMD data](#)²⁵ which they consider to be relevant in their assessments. This can 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.

- o Engagement and consultation

80. Children themselves know best where they play and what types of play opportunities suit them best, and so they must be engaged in ways that they can properly and meaningfully participate in the PSA process.

81. Meaningful engagement must be integral to the process of carrying out PSAs. The Regulations do not specify how the engagement should take place or what methodology should be used, only to emphasise that planning authorities are expected by law to engage with the population groups specified, as part of the assessment process.

82. 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, planning authorities must also extend to include engaging their parents and carers who have their best interests at heart.

83. In preparing the PSAs, it is the duty of planning authorities to consult with the following:

- (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, and such other community bodies or persons, whom the planning authority consider should be consulted, and
- (d) the public.

84. 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 island 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.

²⁵ [Scottish Index of Multiple Deprivation 2020](#)

85. **Place Standard tool Children’s and Young People’s Versions.** In 2022, the Place Standard partners launched a new suite of resources to support the core [Place Standard tool](#)²⁶, which includes two [versions](#)²⁷ that are adapted and designed to facilitate more effective engagement with children and young people. Planning authorities may wish to use these versions of the tool or to adapt them to suit their own engagement with children when carrying out PSAs.
86. Planning authorities may already have existing engagement practices or may be using other innovative methods to facilitate involvement of and co-production with children which they can adapt for this purpose. Planning authorities and practitioners are encouraged to share good practice and learning in this respect.
- **Publication**
87. It is the responsibility of the planning authority to publish the completed PSA report 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.
88. Whilst not a statutory requirement, it is advisable that the report should be organised in a printable format should there be any request by a stakeholder or a stakeholder group for a printed copy to be made available.
89. Planning authorities are also encouraged to consider the publication of the PSA report or the relevant summary of the report in a suitable child-friendly version that is accessible for younger children.
90. As required by the Act, the PSA must be completed as part of preparing an evidence report, ensuring there is sufficient evidence to support the preparation of the LDP, as already described in earlier section of this guidance. The Evidence Report is to be submitted to the Scottish Ministers at Gate Check for independent review.

²⁶ [Place Standard tool](#)

²⁷ [Place Standard tool Children and Young People](#)

Glossary and acronyms

| Terms | Description |
|------------------------------------|---|
| 20-minute neighbourhood | A flexible approach to assessing our places against the concept of local living. A method of achieving connected and often compact neighbourhoods designed in such a way that people can meet the majority of their daily needs within a reasonable distance of their home preferably by sustainable and active travel methods. The principle can be adjusted to include varying geographical scales from cities and urban environments, to rural and island communities. Housing would be planned together with local infrastructure including schools, community centres, local shops and health and social care to significantly reduce the need to use unsustainable methods of travel, to prioritise quality of life, help tackle inequalities, increase levels of health and wellbeing, and respond to the climate emergency. |
| “the Act” | The Town and Country Planning (Scotland) Act 1997 ²⁸ , as amended by the Planning (Scotland) Act 2019. |
| Children/Children and young people | Persons under the age of 18 years. |
| Child-friendly version | A version of a report or summary which is specifically designed to take account of the age, understanding and usual language of any children or young people by whom it is intended that the report should be read ²⁹ . Child-friendly means it should be easy for children to understand and appealing for them to engage with ³⁰ . |
| Evidence Report | A supporting document to the LDP. An Evidence Report summarises the evidence base for those proposals and policies set out in the development plan and demonstrates that appropriate consultation has been undertaken and regard given to the views of the community. |
| Gate Check | An assessment of the sufficiency of the evidence base on which the Proposed Plan will be developed. It is one of the processes of LDP preparation. |
| Green space/Green or blue space | Space, other than agricultural land, which serves a recreational or an amenity function for the public, or provides aesthetic value to the public such as areas of: (a) grass, (b) trees, (c) other vegetation, (d) water. |
| Local Development Plan/ LDP | A plan in which it is set out, for land in the part of the district to which it relates: |

²⁸ [Town and Country Planning \(Scotland\) Act 1997](#)

²⁹ [Law insider.com](#)

³⁰ [Adapting the Child-friendly Example of the Convention on the Rights of the Child with and for Children in your Context. Child Rights Connect et al.](#)

| Terms | Description |
|------------------------------------|--|
| | <ul style="list-style-type: none"> • a spatial strategy, being a detailed statement of the planning authority's policies and proposals as to the development and use of the land; • such other matters as may be prescribed; and • any other matter which the planning authority consider it appropriate to include. <p>It forms part of the statutory development plan.</p> |
| National Planning Framework 4/NPF4 | Scotland's long-term plan looking to 2045 that guides spatial development, sets out national planning policies, designate national developments and highlight regional spatial priorities. It is part of the statutory development plan, and so influences planning decisions across Scotland. |
| Open space | 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. |
| Open space audit | An audit of existing open space provision by local authorities, currently on a non-statutory basis. It typically consists of a record of the type, functions, size, condition, location, and maintenance requirements of the spaces and to provide some insight on levels of use. |
| Open space strategy | 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. It must contain; an audit of existing open space provision, an assessment of current and future requirements, and any other matter which the planning authority consider appropriate. |
| Place-based approach | A place-based approach is about understanding the issues, interconnections and relationships in a place and coordinating action and investment to improve the quality of life for that community ³¹ . |
| Place Standard tool | The Place Standard tool ³² is a way of assessing places. It provides a simple framework to structure conversations about place, based around 14 questions. |
| Play | Play encompasses children's behaviour which is freely chosen, personally directed and intrinsically motivated. It is performed for no external goal or reward, and is a fundamental and integral part of healthy development - not only for individual children but also for the society in which they live ³³ . |

³¹ [What is a Place-based Approach?](#)

³² [Place Standard tool](#)

³³ [What is Play, Play Strategy for Scotland: Our Vision, 2013](#)

| Terms | Description |
|--|---|
| Play opportunities | In the context of PSA, this means opportunities to play outdoors. |
| Play spaces | In the context of PSA, “play spaces” means outdoor spaces which are accessible by the public and which offer play opportunities for children. |
| Play Sufficiency Assessment/PSA | The assessment of the sufficiency of play opportunities for children in their area, carried out by a planning authority under the duty as set out in in Section 16D(1) of the Town and Country Planning Scotland Act 1997 ³⁴ , as amended. It must be carried out by the planning authority in preparing an evidence report. |
| Play Sufficiency Assessment Regulations/ “the Regulations” | Town and Country Planning (Play Sufficiency Assessment) (Scotland) Regulations 2023 ³⁵ |
| Proposed Plan | A draft stage of the LDP, which must be approved by full council before proceeding to consultation. |
| Protected characteristics | The Equality Act 2010 ³⁶ defines the following as protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, and sexual orientation. |
| United Nations Convention on the Rights of the Child/UNCRC | An international human rights treaty that sets out the civil, political, economic, social, health and cultural rights of children. |
| UNCRC Article 1 | Definition of the child. Everyone under the age of 18 has all the rights in the Convention. |
| UNCRC Article 12 | Respect for the views of the child. Every child has the right to express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously. This right applies at all times, for example during immigration proceedings, housing decisions or the child’s day-to-day home life. |
| UNCRC Article 15 | Freedom of Association. Every child has the right to meet with other children and to join groups and organisations, as long as this does not stop other people from enjoying their rights. |
| UNCRC Article 31 | Leisure, play and culture. Every child has the right to relax, play and take part in a wide range of cultural and artistic activities. |

³⁴ [Town and Country Planning \(Scotland\) Act 1997, Section 16D\(1\)](#)

³⁵ [Town and Country Planning \(Play Sufficiency Assessment\) \(Scotland\) Regulations 2023](#)

³⁶ [Equality Act 2010](#)



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