

### **West Dunbartonshire Council response to Scottish Government consultation on open space strategies and play sufficiency assessment regulations.**

#### **Consultation Question 1**

**a) Do you agree with the idea of promoting an outcomes-based approach through the OSS Regulations? b) Do you agree with the suggested outcomes?**

West Dunbartonshire Council agree with an outcomes-based approach to preparing Open Space Strategies and agree with the themes of the suggested outcomes.

#### **Consultation Question 2**

**Do you agree with the proposed definition of a) 'open space' b) 'green space' c) 'green infrastructure' d) 'green networks' e) 'ecosystem services'?**

The provision of definitions is welcome. It is considered that esplanades could be a useful addition to the types of use listed under the 'open space' definition.

The meaning of 'ecosystem services' is not clear. To help, examples should be given of the 'benefits people obtain from ecosystems'.

#### **Consultation Question 3**

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

West Dunbartonshire Council agree that a threshold for sites being included in open spaces strategies should be set, and that it should be set at 0.2 hectares or greater, with flexibility given to authorities to include smaller sites if appropriate.

#### **Consultation Question 4**

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

Yes.

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

Yes.

#### **Consultation Question 5**

**a) Do you agree with suggested approach to require locality level place based information?**

Yes.

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

Yes.

### **Consultation Question 6**

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

Yes. Engagement in the Open Space Strategy process will be a new requirement for the Green Action Trust and many of the Key Agencies. It is important these organisations are resourced to provide this engagement.

### **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 ? b) be informed by engagement with the groups set out?**

Yes.

### **Consultation Question 8**

**Do you agree Open Space Strategies should a) include a statement setting out how they contribute to the outcomes? b) identify strategic green networks? c) identify how green networks may be enhanced?**

Yes.

### **Consultation Question 9**

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

The requirement to publicise the Open Space Strategy for two successive weeks in local press is excessive. If a press notice is required, then placing it for one week would be sufficient.

It is not clear from this consultation document how the Open Space Strategies are to relate to the local development plan process. Are they expected to be completed in advance of the local development plan process, so that they can inform the plan? Or are they to run concurrently?

### **Consultation Question 10**

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

Yes.

### **Consultation Question 11**

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

Yes. This would tie-in with the 10-year local development plan timeframe. However, if a local development plan is prepared within a shorter timeframe, and an open space strategy is not, the preparation of the documents could fall out of synch. As

per point above, clarity is therefore required on whether the local development plan and open space strategy processes are integral to each other.

#### **Consultation Question 12**

**Do you agree with the proposed definitions? “children” “localities” “open space” “play opportunities”**

Yes.

#### **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)?**

Almost all open spaces, and certainly those over 0.2ha, offer some opportunity for play, even if that is not the primary function of the space. By not identifying a space as a play opportunity, a planning authority may be accused of suggesting a space is not suitable for play. There is also a potential liability issue for a planning authority if it indicates through its play sufficiency assessment that an open space is suitable for play, and subsequently there are accidents or other safety/welfare issues involving children in that space.

#### **Consultation Question 14**

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

Yes, and whilst offering no comment on the details on the indicative tool, it is agreed that such a tool would be helpful.

#### **Consultation Question 15**

**a) Do you agree to the proposed three aspects of assessment - 'accessibility', 'quantity' and 'quality'?**

**and b) to provide them in written statements in respect of the totality of the local authority area and at each locality level?**

Yes. However, it may be appropriate to include 'Inclusivity' as a separate part of the assessment rather than have it enveloped with 'accessibility'. This is likely to make assessment of that aspect of play facilities more thorough.

#### **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.

**b) Do you agree with the proposed list of consultees on play sufficiency assessment?**

Yes, however whilst including 'parents and carers' within the list seems logical, strictly speaking it will also place on the planning authority a requirement to prove that adults they have consulted with are parents/carers. Consideration should therefore be given to removing the 'parents and carers' requirement, on the assumption that this group will be reached through 'the public' grouping.

#### **Consultation Question 17**

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

Yes.

#### **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)?**

No

#### **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.**

No comment.

#### **Consultation Question 20**

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

No comment.

#### **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?**

No comment.