

Draft National Planning Framework 4

Response from A Place in Childhood

A Place in Childhood (APiC) is a Scottish Charitable Incorporated Organisation. We facilitate projects which enable the rights of young citizens to participate meaningfully in societal improvement, while building lifelong skills for a prosperous and equitable future. Children's lived experience combines with our research, policy, and action expertise to help their communities adapt to the unprecedented challenges and uncertainty we all face. Through this we promote superior environments for children and young people which align with the UN Convention on the Rights of the Child.

We are writing to submit our response to the **Draft National Planning Framework 4** consultation. We have reviewed these documents in relation to our main area of interest, children and young people.

The first section of this response revisits the recommendations we previously made to the NPF4 'Call for Ideas' and examines the extent to which these recommendations have been included in the plan. The second section answers the questions set out by the consultation which we considered to relate to our area of interest.

We are happy to provide further views and clarifications on any part of our response as required. We are also happy to provide further information with regards to any of the evidence and research which we have referenced throughout this response.

We are keen to continue to be a proactive partner in the development and implementation of the NPF4. We consider it to be a significant opportunity to build on the policy ambitions set out under previous planning policy frameworks to improve the lives and wellbeing of young citizens across Scotland through great planning.

Please contact us at anna.gaffney@aplaceinchildhood.org to discuss any aspect of this response in further detail.

Please note we have emailed this response to scotplan@gov.scot with a completed Respondent Information Form. We have not uploaded this response to the Scottish Government's Consultation Hub due to our inclusion of graphics and hyperlinks throughout the response.

Yours Sincerely



Anna Gaffney on behalf of the APiC Board of Trustees

A Place in Childhood's (APiC) Vision for an Inclusive and Effective National Planning Framework 4

We want to see Scottish planning deliver inclusive, child-friendly environments, where children and young people have opportunities to play, study, travel and live freely and safely, in both new developments and existing places. We want to see places designed and developed in collaboration with children and young people to support their rights and wellbeing. This will further support goals of achieving sustainable, net zero places, and embedding equalities into the planning process and outcomes.

Part 1: Recommendations for a Child-Friendly Scottish Planning System




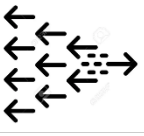

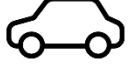


We have revisited the recommendations we previously issued in our response to the NPF4 'Call for Ideas', as based on the 2019 APiC/ZCD Architects/RTPI report Child Friendly Planning in the UK – A Review. Measuring these against the current draft NPF 4, we observe that there has been positive progress to date, particularly in relation to our Recommendations 2, 3 and 4:

- Recommendation 2: NPF4 should give central prominence to children and young people's needs for movement and independence.
- Recommendation 3: NPF4 must ensure that play, recreation, leisure and assembling in public space is at the heart of what Scottish planning policy and decision-making delivers for children and young people, including ensuring the use of Play Sufficiency Assessments and Action Plans.
- Recommendation 4: NPF4 should support local and regional planning policy and new developments proposals that aim for desirable social and health outcomes

Yet, we believe NPF 4 has further opportunity to prioritise children and young people across policies. For instance, clear links could be made to existing Scottish Government policy around children's rights and wellbeing to ensure planners in practice are robustly signposted to other core societal goals. We particularly believe that their right to participation must be emphasised through strong, implementable, policy. This would enable the framework to meet our first recommendation:

- Recommendation 1: NPF4 should confirm children and young people's rights to be included in planning decision-making.

See below an infographic that lays out the multiple benefits of involving children and young people:

Children and Young People		Adults		Both	
<p>Significant Individual Value</p> 	<p>Having their views taken into account they can develop confidence, self-esteem, a greater appreciation of democracy, and how systems and services around them operate.</p>	<p>Children and young people can bring insights to decision-making processes that an adult may never gauge alone</p> 	<p>Being smaller in stature means children can sometimes access places adults cannot, and see things that never catch the attention of adults. For example, dog poo, cigarette butts and street bins are often closer to the noses of young children, who can experience urban areas as especially smelly. They can also be very observant about the social dynamics within a space, and often have a visceral understanding of where is and is not safe.</p>	<p>Effective dialogue can benefit intergenerational relationships</p> 	<p>Which can also help tackle loneliness – something experienced most by younger and older people.</p>
<p>Learning How Change Can Happen</p>  <p></p>	<p>Being involved in decisions and local change gives children and young people valuable skills for their current and future trajectories. These include creative thinking, teamwork, and sensemaking. Many of these are skills we know we need as a society.</p>	<p>Children and young people tend to not have their own independent incomes, nor means of motorised transport</p> 	<p>This means that engaging them gives key insights into how and whether a place serves the needs of people on low incomes, and who need to travel through active and public means.</p>	<p>The creation of more child-friendly environments also confers benefits for inclusive environments</p> 	<p>Where the needs of more vulnerable populations are considered at the outset</p>
		<p>Children and young people's participation can act as a catalyst for engaging adults more constructively in the decision-making process</p> 	<p>Especially in considering more imaginative opportunities for improvement, and moving conversations beyond immediate barriers to opportunity.</p>		

Prioritising equity, diversity and democracy in planning ensures the outcomes of plans and new development meet the needs of as many as possible. In a time of multiple social, economic and environmental crises, a focus on socially just and adaptive policies has never been more important.

Finally, across our response we note that child friendly places are also healthy, sustainable and inclusive. They genuinely put the wellbeing of future generations at the forefront of decision-making. We request that reference be made to child-friendly planning in a similar capacity as the 20 minute neighbourhood; bringing it in as a central organising principle.

We are keen to be a proactive partner in developing and implementing NPF4. We consider it a significant opportunity to build on the policy ambitions set out under previous planning policy frameworks to improve the lives and wellbeing of young citizens through a robust child-friendly Scottish planning system.

Part 2: Draft NPF4 Consultation Questions and Responses

In the remainder of this document, we answer all relevant questions laid out in the consultation questions provided.

Spatial principles - Page 10

Q 6: Do You Agree That These Spatial Principles Will Enable The Right Choices To Be Made About Where Development Should Be Located?

Whilst support the intent of the six overarching principles presented in Compact Growth, Local Living, Balanced Development, Conserving and Recycling Assets, Urban and Rural Synergy and Just Transition, no mention is made of the approach to children and young people's involvement within the overarching principles. Inclusion of their involvement would be in line with the ethos of the Wellbeing Economy with a focus on future (and current) generations. It would further strengthen the planning systems' adherence to the incorporation of the UN Convention on the Rights of the Child (UNCRC) into Scots law.

National Spatial Strategy Page 3 - 43

Q 18: What Are Your Overall Views On This Proposed National Spatial Strategy?

NPF4 has the opportunity to further prioritise children and young people's participation through strong policy. The language used to highlight Children and Young People's rights needs strengthening throughout. Prioritising equity, diversity and democracy in planning ensures outcomes of plans and new development meet the needs of as many as possible and leads to more socially just places, including those of children and young people.

Child friendly places are also healthy, sustainable and inclusive places, we would request that reference be made to child-friendly planning in a similar capacity as the 20 minute neighbourhood organising principle. This would encourage planning professionals, developers and designers to see children and young people as individuals, and not just part of a family unit.

If Scotland believes in enhancing community wealth building, then children and young people need to be central to the process. They want viable futures and want to be involved in the change that needs to happen and to learn skills that will allow them to thrive in a climate adapted Scotland. They are frustrated by inaction on climate change and seeing nature in their communities decline. This is often even worse in more deprived communities.

Children and young people also want more of a focus on learning the skills for the future economy that they need to be instrumental in building. We agree that climate adaptation will provide the opportunity to build a Wellbeing Economy, and there is no better stakeholder group to help us understand what that means and what needs to happen in the community than children and young people. Our [#ScotYouthandCOVID](#) project shows that tackling inequality is the highest priority for young people we've worked with, as we recover from the significant impact of the COVID-19 pandemic.

In addition, APiC has been working across Scotland throughout the pandemic and would be willing to share further detail on the positive impact of including children and young people from the following projects. This is both in terms of intrinsic value to the children and young people, and also to the information gathered from their perspective that can better inform planning decisions:

- **Enabling Independent Active Travel for Scotland's Young People, funded by Sustrans:**
 - Denny/Bonnybridge - impact of pollution on children and young people's daily lives, motorways cutting through communities to create divides, lack of opportunity for young people. But great natural resources that they want to see protected and enhanced.
 - Kinlochard/Aberfoyle/Callander - impact of unsustainable tourism on the lives of children and young people - stopping them from going outside, vandalising the natural resources they care about so strongly, and limited public transport opportunities that limit independence and local opportunity.
 - Edinburgh - impact of high traffic volumes, lack of youth hangout spaces where they feel safe and welcome, vandalism, gaps in active travel connectivity
 - Aberdeen - more deprived areas cut off from the rest of the city by A roads, leaving communities feeling disconnected and enhancing a level of stigma that affects their daily lives. Cramped living conditions for some, high density leading to overcrowded green spaces during the pandemic, and high incidence of road accidents. A need for affordable activities for young people and to enhance the nature provision and maintenance in parks.
- **Redesigning Langdale Street in North East Glasgow, funded by Sustrans**
 - communities cut off from the rest of the city by motorways, with high levels of road accidents and difficulty reaching the city easily and affordably. Lots of opportunities for local food growing, and a community with a strong identity.
- **Teenagers and Public Space Research Project (ongoing), funded by Sustrans**
 - Pilton, Edinburgh: new development being built on areas that used to have value to young people, without any consultation. Anti-social behaviour affecting feelings of safety (especially at night), living around derelict land and ongoing regeneration for the entirety of many young people's lives, noticing a lack of maintenance and enjoyable natural surroundings, poor access to the beachfront despite proximity.
 - Huntly, Aberdeenshire: a loss of services that help young people, loss of affordable cafes and places to hangout, public transport networks

that need improving, focus on sports activities but not a lot of non-sporting choices available.

- Denny/Bonnybridge/Banknock/Dunipace: rising levels of anti-social behaviour, litter, high pollution levels and disconnection during the pandemic (especially for girls). Limited opportunities for young people to use public space without being accused of anti-social behaviour (e.g. using the swings in the local park).
- **Drymen 20 Minute Neighbourhood Plan, funded by Forth Environment Link:**
 - Drymen: children really value the local natural surroundings, and community feel of the village. They were upset that new housing developments are being built on an area they routinely use for sledging, and no one asked their views on this to see if an alternative arrangement could be made. They had ideas for new local businesses that would meet their needs, and produced a highly-competent 20 minute neighbourhood plan that also considered the skills they could contribute to a more sustainable village.

Part 3 - National Planning Policy - Page 68

Policy 4: Human rights and equality - Page 70

Q 26: Do You Agree That This Policy Effectively Addresses The Need For Planning To Respect, Protect And Fulfil Human Rights, Seek To Eliminate Discrimination And Promote Equality?

We do not believe this policy adequately addresses the need to consider children's human rights. The language used in this policy is very weak, and would benefit from noting the key human rights instruments enforceable in Scotland, and that the UNCRC is being incorporated into Scots law. We also believe that the policy will be enhanced by noting core principles of what meaningful participation means - it is one thing to say that engagement is open to everyone, but reality is that children and young people will not be included in an 'open to everyone' approach alone.

We also note that very limited attempts have been made by the Scottish Government to enable contributions from children and young people in this consultation. A community fund was open up until mid January (most of the time was over the Christmas holidays); the £250 on offer was low with regards facilitating high-quality engagement, and the form was exceptionally complex for such a small pot of money. As a result, groups are left needing to find their own ways to make this work on budgets they generally do not have. We note that the Integrated Impact Assessment notes early consultation with children and young people. However, we cannot find

full details of the outputs of all of these workshops and how they shaped NPF4. From what we can find, we see no evidence of the involvement of anyone aged 12 and below.

We feel very strongly that it is the responsibility of the Scottish Government to be more inclusive and lead the way in child-friendly engagement. There is no child-friendly version of the document out in consultation form, nor mentioned as being in development. This is something that we would be able to assist with, and have already tried to create a way to gather some views of children and young people to inform the Scottish Government's thinking on NPF4 revisions.

Any policies that promote qualities and human rights must be easy to understand and enforce, given the history of planning strengthening inequalities rather than reversing them. For instance, the freedom that children and young people have to explore their communities has been in freefall decline since the 1970s. While not exclusive down to the planning system, it is a key mechanism that has enabled a doubling-down of social attitudes that keep children and young people indoors.

We want to see a complete reversal of this trend, and for planners to be appropriately trained and adequately resourced to meet their equalities and human rights duties. We are keen to be a proactive and constructive partner in this.

Policy 5: Community wealth building - Page 71

Q 27: Do You Agree That Planning Policy Should Support Community Wealth Building, And Does This Policy Deliver This?

Whilst we support the intent of the Planning Policy 5 to support community wealth building, no mention is made of the approach to children and young people's involvement with the policy. Inclusion of their involvement would be in line with the ethos of the Wellbeing Economy with a focus on future (and current) generations.

Is there clarity across the sector on what community wealth building means to children and young people? Is it physical interventions within the built environment and/or the services or social networks it can support? It is not clear how this policy will deliver on its aspirations, and no signposting is offered elsewhere for practitioners to further understand the intent. From the limited content within the policy it is impossible to understand if a common approach has been established to measure social value and how children and young people feature in that measurement of success.

Are we confident that our Local Authorities have the skills and resources to understand what it means to reflect a people-centred approach, that includes children and young people? Unfortunately we have seen no evidence to suggest this

is the case, and thus call for clear and precise language that lays out children and young people's role in this and highlights how community wealth may have a different interpretation to a child that should be considered and valued.

Policy 6: Design, quality and place - Page 71

Q 28: Do You Agree That This Policy Will Enable The Planning System To Promote Design, Quality And Place ?

In regard to Policy 6(b) we support the inclusion of masterplans, development briefs and design and access statements as additional design tools for securing developments of high design quality. However, we would support the expansion of adopted design guidance from statutory consultees to include a broader range of stakeholders including groups that may compile a Local Place Plan, Community Councils and other bodies which may include the input of children and young people.

Whilst the input from statutory consultees is highly valuable, their key role is to uphold national policy interests, and do not offer the granular knowledge or design principles which would secure the specific design features which support the 'Six Qualities of Successful Places'. As we have outlined throughout our policy response, the identification of the qualities and features of places which are important and valuable to children and young people, are often missed due to a lack of regular or detailed engagement to identify this. The inclusion of a broader group of stakeholders within this policy would support a transition to a more inclusive, specific and detailed approach to place design.

We support the inclusion the 'Six Qualities of Successful Places' as part of the policy framework however we believe that the six qualities would benefit from the identification of the importance of the role which local consultation, including with children and young people, has in ensuring that development proposals are reflective of the character of the area, local needs, and integration into the broader sense of place. We would expect this to be expressed in the policy through the inclusion of the Place Principle in the designing of new development proposals as part of the planning process.

It is positive to note that digital connectivity has been identified within No.3. Well connected and easy to move around quality, as we further outline in our response to Policy 23, digital infrastructure is critical to ensure positive outcomes for children and young people across Scotland.

Policy 7: Local living - Page 73

Q 29: Do You Agree That This Policy Sufficiently Addresses The Need To Support

Local Living?

We support the intent set out in Policy 7 Living Local and agree with the objective of the 20-minute neighbours as a principle for planning new developments and places. However, we believe that the policy could be enhanced by ensuring that planners and practitioners are supported to engage with local communities, including children and young people, to ensure that the nature of the 20 minute neighbourhood and associated infrastructure and facilities are appropriately scaled and integrated with the existing places from their perspective, as well as every other generation that lives in a place.

It is positive to note the inclusion of the description of a 20-minute neighbourhood means all people can meet most of their needs through 20 minutes of walking, cycling or wheeling. This is a helpful description; however, it would be beneficial to clarify that the principle of 20-minute neighbourhoods are based on high quality networks of paths, roads and crossings which ensure ease of accessibility and prioritisation of the pedestrian. Currently many neighbourhoods exemplify the principle of the 20-minute neighbourhood, but the reality of poor-quality street environments, lack of crossings and vehicle-dominated streets means that the 20 minute principle immediately fails. This is especially true for children and young people, and especially for children and young people that have mobility difficulties.

APiC has been working across Scotland throughout the pandemic and is willing to share further detail on the positive impact of including children and young people when planning a 20 minute neighbourhood, for example the Drymen project, which we undertook in partnership with Forth Environment Link. The outputs of this have been very sensible and detailed. We have a robust and proven methodology for creating 20-minute neighbourhoods plans that we are willing and keen to share with any and all interested stakeholders.

Policy 9: Quality homes - Page 76

Q 31: Do You Agree That This Policy Meets The Aims Of Supporting The Delivery Of High Quality, Sustainable Homes That Meet The Needs Of People Throughout Their Lives?

While we support the intent of Policy 9 Quality Homes, there is no mention of child friendly neighbourhoods. Child friendly places are also healthy, sustainable and inclusive places. We would request that reference be made to child-friendly planning within the Policy to ensure that housing proposals are informed by their perspective, and designed to meet their needs. Too often, children are an afterthought and the only concession made towards them is an identikit playground aimed at very young children. Involving children and young people in decision-making, and using the

existing evidence we have around children's play and hanging out in urban environments can substantially improve how we plan new housing so that it meets their needs.

The 'Six Qualities of a Successful Place' should be adapted to include 'child friendly' or 'intergenerational' to ensure measures of success do not remain singular and based around the needs of a fit, employed and capable adult.

Policy 10: Sustainable transport - Page 78

Q 32: Do You Agree That This Policy Will Reduce The Need To Travel Unsustainably, Decarbonise Our Transport System And Promote Active Travel Choices?

Whilst we support the intent of Policy 10 Sustainable Transport, there is no mention as to the perspective to be used when designing and implementing sustainable transport and transport systems. What will be successful for a fit, employed and capable adult will differ from that of a 12 year old child. Will active travel routes be designed from the perspective of an unaccompanied 12 year old girl, for instance?

In our work, we have encountered multiple communities where children are prevented from travelling easily due to motorways or A roads dominating their community. We would like to see policies that look at removing motorways from residential areas, as they are a huge barrier to the health of children and young people, as well as their confidence and motivation to travel sustainably.

Child friendly places are also healthy, sustainable and inclusive places, we would request that reference be made to child-friendly planning within the Policy to ensure that services and systems are informed by their perspective and designed to meet their needs.

Policy 12: Blue and green infrastructure, play and sport - Page 81

Q 34: Do You Agree That This Policy Will Help To Make Our Places Greener, Healthier, And More Resilient To Climate Change By Supporting And Enhancing Blue And Green Infrastructure And Providing Good Quality Local Opportunities For Play And Sport?

We agree with the overall intent of the policy, but do worry about it being combined into Blue and Green infrastructure. This creates a competing agenda, and is not in line with the policy on equalities and human rights. Children and young people's play and recreation, we think, would be more valued and implemented if it was instead part of a spatial principle on child-friendly planning. Furthermore, such policy

provision could have far more practical impact in rural areas which do not require the same level of blue/green infrastructure interventions as urban/suburban areas.

The inclusion of the description which outlines the long-term benefits of play and access to outdoors on children and young people's health and wellbeing is very important for clarifying why it is vital for planning authorities to ensure these types of spaces and facilities are planned for and preserved. We support the inclusion of Policy 12b, but are disappointed that the provision of play opportunities has been enclosed within a policy framework which has competing policy agendas for both physical space and local authority budgets and objectives. It could lead to a tokenistic view that these are the only places for children and young people to play and hangout.

Policy 12(k) is helpful but we advise that without the resources to support planning authorities and delivery bodies to understand the types of facilities most suitable, it is likely that facilities provided will not adequately address needs of those it is intended. In addition, Policy 12(l) is critical and planning authorities must be supported in securing long term maintenance of different spatial offerings attained through this policy.

Overall, whilst we support the principle of Policy 12, we believe that if NPF4 is to secure the necessary facilities for children and young people through the planning process, a distinct policy for planning places for children and young people is required as their needs and use of places are discrete from those of adults. A separate policy should ensure that LDPs integrate the findings from other forthcoming policy provisions (including Open Space Strategies, Play Sufficiency Assessments and Local Place Plans) within their plans to robustly identify the specific provisions required, based on regular and meaningful engagement with children and young people.

Policies 14: Health, Wellbeing and safety- Page 85

Q 36: Do You Agree That This Policy Will Ensure Places Support Health, Wellbeing And Safety, And Strengthen The Resilience Of Communities.

It is positive to note that NPF4 recognises the importance of place on children and young people's opportunities and outcomes in later life. We support the inclusion of policies which identify that developments which have a significant adverse effect on health, air quality and noise should not be supported. We would support the expansion of this topic area to include information which specifically identifies the impacts which developments have on children and young people's health and

wellbeing due to the additional and significant impacts which poor quality places can have on their outcomes, as is already acknowledged by the policy.

Additionally further examples of places which support health, wellbeing and safety for all would also be helpful to support planners to promote interventions in development proposals to achieve these objectives. It would also be beneficial to cross reference these policies with Policies 6, 7 and 12 to demonstrate how this policy further intersects with multiple other policy objectives.

Policy 17: Sustainable Tourism - Page 88

Q 38: Do You Agree That This Policy Will Help To Inspire People To Visit Scotland, And Support Sustainable Tourism Which Benefits Local People And Is Consistent With Our Net-Zero And Nature Commitments?

We support the inclusion of Policy 18(g) as our research with children and young people within Loch Lomond and the Trossachs National Park has identified significant issues with regard to the impact of high levels of tourism on the local area. This includes severe vandalism, litter, highly problematic anti-social behaviour, and major impacts on the environment.

We would strongly support an expansion of Policy 18(g) to provide further detail as to the different types of impacts which Planning Authorities should be aware of in the assessment of forthcoming planning applications, and to inform ongoing liaison with local communities, inclusive of children and young people, with regards to the future planning of tourism and tourist facilities in their areas.

Policy 18: Culture And Creativity - Page 89

Q 39: Do You Agree That This Policy Supports Our Places To Reflect And Facilitate Enjoyment Of, And Investment In, Our Collective Culture And Creativity?

We agree with the intention of the policy, but wish to see emphasis on how cultural perceptions and values can be different for children and young people. We find through our work that their culture is often not respected, which can be a breach of their rights. In particular, their Article 15 right to organise their own activities providing they respect the law.

For example, town centres often do not have a culture of including children and young people, which is something that should be challenged through planning. Ownership and use of space, such as graffiti walls or designated youth hangout spots with youth-friendly design are lacking in our built environment. This policy

could lay the important groundwork for better integration of children and young people's collective culture and creativity.

Policy 23: Digital Infrastructure - Page 96

Q 44: Do You Agree That This Policy Ensures All Of Our Places Will Be Digitally Connected?

Whilst the policy provision for children and young people throughout NPF4 links specifically to access to outdoor spaces and nature, access to digitally connected places is also more critical than ever. This helps ensure positive outcomes for the health and wellbeing of children and young people through access to communication platforms for social connectivity and educational resources (especially in times of crisis).

Long term cuts to public funding which have traditionally supported indoor spaces for children and young people such as youth clubs, and the impact of the COVID-19 pandemic has meant that they are increasingly drawn to public spaces which offer wi-fi and shelter. There is an opportunity for NPF4 to identify digital connectivity to be a core consideration of new developments, including expanding the definition of developer contributions to include digital infrastructure and connectivity to public spaces provided as part of new developments, including but not limited to, parks, pathways and public transport.

Our research with children and young people continues to demonstrate the criticality of digital infrastructure to their health and wellbeing. If you want to learn more about our findings, please contact us at info@aplaceinchildhood.org.

Policy 28: Historic Assets And Places - Page 100

Q 46: Do You Agree That This Policy Will Protect And Enhance Our Historic Environment, And Support The Re-Use Of Redundant Or Neglected Historic Buildings?

We agree that this policy will protect the historic environment assets as designated through the existing legislation. However, we would support the inclusion of a definition of non-designated heritage assets to be included as part of the NPF4 to ensure that land and buildings of particular significance to local communities, including children and young people, are considered.

Children and young people hold deep and personal connections to cultural heritage assets, both designated and non-designated, in places where they spend time, including in their localities and broader communities. However, the heritage assets which are highly regarded by children and young people are often not fully recorded due to poor/no engagement with them. A number of historic gardens, woodlands, pathways and other designed landscapes do not hold statutory protections but do hold deep value to children and young people. As these assets are part of Scotland's heritage, planning authorities should be empowered to protect and preserve them wherever feasible and NPF4 should offer direction to support this.

Policy 29: Urban Edges And The Green Belt - Page 102

Q 47: Do You Agree That This Policy Will Increase The Density Of Our Settlements, Restore Nature And Promote Local Living By Limiting Urban Expansion And Using The Land Around Our Towns And Cities Wisely?

We support the principal objectives of the policy, to increase the density of settlements, restore nature and promote local living by limiting urban expansion. However, to empower planning authorities to take a place specific approach which includes the perspectives of children and young people, NPF4 should pay credence to the research undertaken by Natalia Krysiack regarding child friendly cities in dense urban areas. There is always a risk with high-density that the places children and young people use and enjoy are crowded out by development pressures, while dense living conditions can also lead to high incidence of perceived anti-social behaviour when children and young people have very little to do.

Policy 30: Vacant And Derelict Land - Page 104

Q 48: Do You Agree That This Policy Will Help To Proactively Enable The Reuse Of Vacant And Derelict Land And Buildings?

Our research has found that children and young people and their communities often have close connections and valuable ideas about the future use of vacant and derelict land and buildings in their communities. We would support an expansion of the policy to include support for community aspirations for vacant and derelict land as far as feasible.

Additionally, we support the inclusion of the definition of vacant and derelict land in the document. We would support these definitions being included as part of the policy itself, rather than located within a glossary to ensure easy accessibility. As part of our engagement on NPF4 (in collaboration with Play Scotland) with stakeholders who work with children and young people, the lack of definitions and transparency regarding the status of land and buildings within communities was noted as a barrier to long term engagement with the planning system.

Policy 31: Rural Places - Page 105

Q 49: Do You Agree That This Policy Will Ensure That Rural Places Can Be Vibrant And Sustainable?

We acknowledge the ambition of Policy 31, but we do not believe it can ensure vibrant and sustainable rural places. If we really want to revive these places then we really need to address why young people are leaving. This requires working with children and young people, to make them places that they value and see a future in. We have so far seen work by organisations such as Youth Rural Scotland that work with 18-30 year olds, but the preventative approach requires working with the under 18 age group as well.

In a project we recently undertook in Huntly, Aberdeenshire, on Teenagers and Public Space we found that there is little that makes young people feel they have a future in the town. Much of the surroundings feel stale to them, and they wanted the history of the community to be brought to life and for the vacant buildings to be put to use for child and youth focused activities. They noted a specific lack of things to do for the 10-15 year old age group, which leaves many feeling disaffected and getting into drugs and alcohol. They wanted systemic solutions to this problem.

Policy 32: Natural Places - Page 107

Q 50: Do You Agree That This Policy Will Protect And Restore Natural Places?

We agree that this policy will protect natural places as designated through the existing legislation. However, we would support the inclusion of a definition of non-designated natural assets to be included as part of the NPF4 to ensure that land and buildings of particular significance to local communities, including children and young people, are protected and restored.

Similarly to cultural heritage assets, children and young people hold deep and personal connections to both designated and non-designated natural places where they spend time, including in their localities and broader communities. However, the natural assets which are highly regarded by children and young people are often not fully recorded due to poor ongoing engagement with them. Our research has repeatedly demonstrated the deep value which local burns and waterways hold to children and young people, as well as small woodland areas and other natural environments. As these assets are part of Scotland's natural environment, planning authorities should be empowered to protect and preserve them wherever feasible and NPF4 should offer a direction to support this.

Policy 35: Coasts - Page 111

Q 53: Do You Agree That This Policy Will Help Our Coastal Areas Adapt To Climate Change And Support The Sustainable Development Of Coastal Communities?

We agree that this policy will help coastal areas to adapt to climate change and support the sustainable development of coastal communities. However, we would support the expansion of policy to include support for community aspirations, including those of children and young people, for coastal areas including the preservation and protection of places and access to them. Similarly to the importance of natural places and woodlands, coastal areas hold significant importance to children and young people, both as nearby residents and visitors. NPF4 should empower planning authorities through LDPs to identify and protect the places, and access to them, as informed by regular engagement with both children and young people and wider communities.

Part 4 - Delivery

Delivering Our Spatial Strategy - Page 112

Q 54: Do You Agree With Our Proposed Priorities For The Delivery Of The Spatial Strategy?

Q 55: Do You Have Any Other Comments On The Delivery Of The Spatial Strategy?

If the Scottish Planning System is to deliver child-friendly environments, where children and young people have the opportunities to play, study, travel and live freely and safely, a fundamental shift in how the planning system enables collaboration from communities is required. We have identified throughout our response how engagement with children and young people can ultimately promote and enhance

the attainment of the objectives set out by the NPF4, as well as support the principles of the UNCRC. However, without effective collaboration with key stakeholders, which includes the children and young people of Scotland, the success of NPF4 and the wider Transforming Planning Implementation Programme will be limited. We welcome the initial work undertaken by the Scottish Government and Scottish Futures Trust to support broader discussions regarding the delivery programme. We are also keen to support the inclusion of children and young people in the planning system.

We support the inclusion of Local Place Plans (LPPs) as part of the delivery of NPF4, however we believe that it would be valuable to include community engagement as part of this section. LPPs should not be relied upon as the only form of community engagement to identify the values and priorities of local communities. Community engagement, especially with children and young people, should be an ongoing process which requires long term communication, evaluation and feedback between the community and planning service to ensure that the impacts of changes are adequately reflected and accounted for in plans and policy. LPPs offer one tool in a range which should be deployed and supported as part of land use planning.

We note the inclusion of planning obligations as part of the delivery programme. Planning obligations provide essential mitigation and enhancement measures which can secure the success and integration of new developments. We are keen to contribute to ongoing discussions with regard to how planning obligations can contribute to the wider planning aims of environmental improvement, social cohesion, improved health and place resilience as these will support the outcomes for children and young people for years to come.

We note the inclusion of investing in planning services through the revision of planning fees and the linking of resource for authorities in relation to performance. We would advise that investing in the planning system should also mean investment in the staff and processes which support the functionality of the system including ongoing training, support staff and access to information including, but not limited to, GIS systems, up to date demographic data and research papers. Additionally, investment in planning consultation services for LDPs is also critical to ensure that planners can engage with local communities, including children and young people, in practical and substantial ways which yield information and outputs which are of value to both the communities and planners.

We support the ongoing digitalisation of planning programme which should offer excellent support to planning authorities to streamline processes both within Development Planning and Development Management. However, until this is rolled out to all authorities, ongoing support to planning authorities to work in partnership with organisations to secure services to achieve their work is essential.

Part 5 - Annexes

Annex C - Page 120

Q 58: Do You Agree With The Definitions Set Out In The Glossary? Are There Any Other Terms It Would Be Useful To Include In The Glossary?

We note that there are no references of the following:

- Play Sufficiency Assessments
- The UNCRC Bill
- Integrated Impact Assessments
- Society And Equalities Impact Assessment

Q 66: Do You Have Any Comments On The Findings Of The Children's Rights And Wellbeing Impact Assessment?

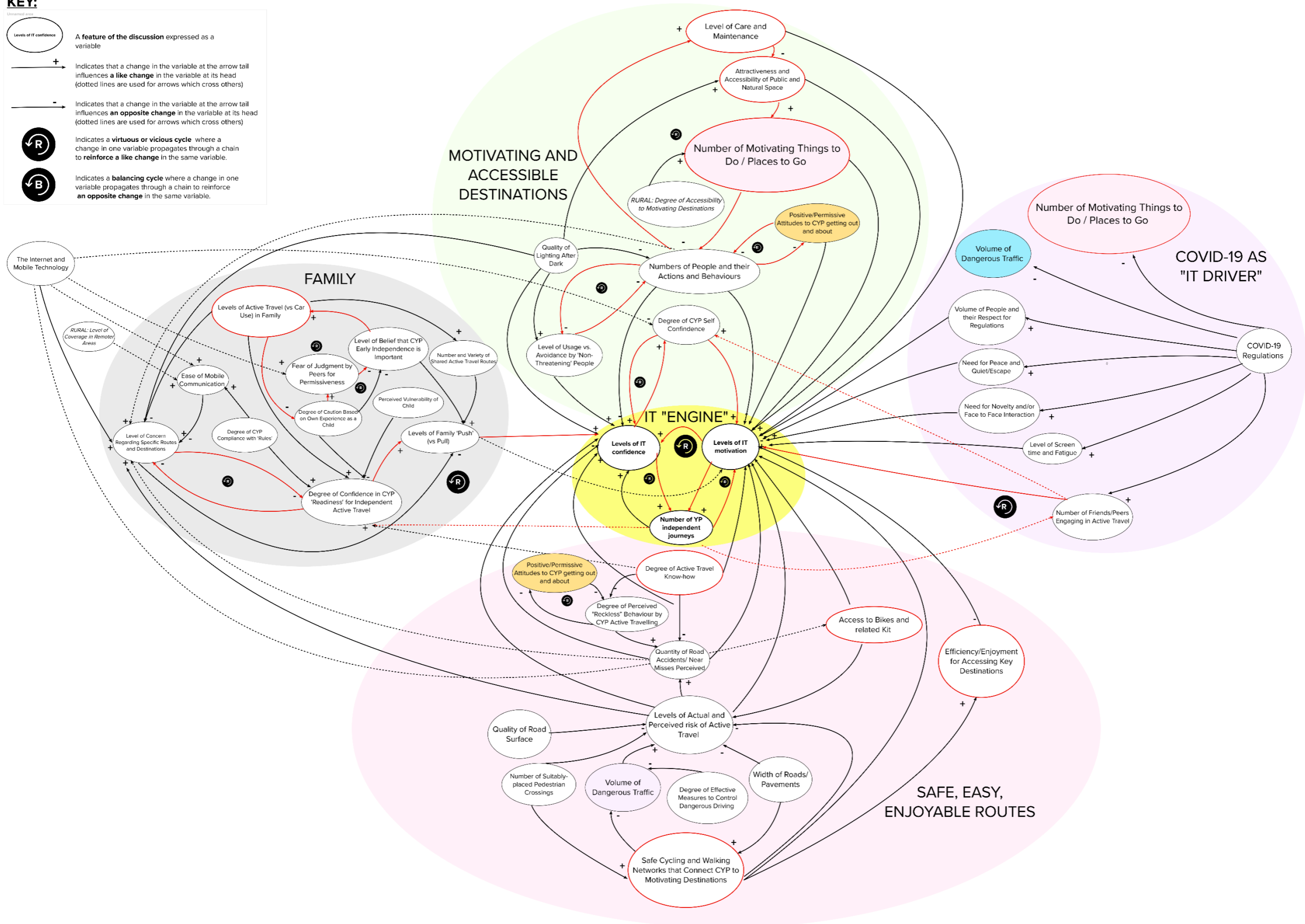
We are pleased to see a Child Rights and Wellbeing Impact Assessment has been produced for NPF4, and updated across the drafting process. While it includes a good range of evidence, we are concerned that it misses out a few key pieces of place-based research of relevance. In particular, [#ScotYouthandCOVID2](#) reports several themes of important to children and young people under the topic 'Local Issues:

- We want to feel safe and included where we live. Work with us to hear and understand issues in our local areas and improve opportunities for all children and young people.
- Improve rubbish collection, maintenance of public space, and educate people about protecting the environment and keeping places clean. It affects our well-being

A research project (yet to be published) on Enabling Independent Active Travel for Young People in Scotland (funded by Sustrans) is also highly relevant. Through this, we worked in collaboration with young people and their parents in four case studies to produce in-depth Active Travel maps in Denny/Bonnybridge, Northfield (Aberdeen), Leith (Edinburgh), and Kinlochard / Aberfoyle / Callendar. The resulting systems map of what increased independent active travel for young people is overleaf. This shows the key factors that will help improve the independence of our young people, the barriers that decrease it, and how they interlink. We would be very happy to discuss this further.

KEY:

- Levels of IT confidence: A feature of the discussion expressed as a variable
- Indicates that a change in the variable at the arrow tail influences a **like change** in the variable at its head (dotted lines are used for arrows which cross others)
- Indicates that a change in the variable at the arrow tail influences an **opposite change** in the variable at its head (dotted lines are used for arrows which cross others)
- Indicates a **virtuous or vicious cycle** where a change in one variable propagates through a chain to **reinforce a like change** in the same variable.
- Indicates a **balancing cycle** where a change in one variable propagates through a chain to reinforce an **opposite change** in the same variable.



We also feel that the evidence review we wrote alongside Play Scotland for the Place Standard tool can be used to bring in more detail around the needs and aspirations of children with protected characteristics such as sexuality and disability. We are also concerned that there is no mention of Article 15:

- The rights to freedom of association, which includes to gather and organise their own activities in public space.

This comes up time and again in our work with teenagers and should be explicitly noted. Many feel there is no space for them, and that they are demonised by the public and police for being out and about.

Finally, we feel that the evidence we have provided above in relation to NPF4 policies can and should be used to further enhance the CRWIA. We believe the conclusions drawn are currently simplistic, and children's human rights and wellbeing will be better protected through the Scottish planning system with much more explicit mention and signposting to relevant other policy objectives such as the SHANAARI principles and GIRFEC.