



National Planning Framework 4

Call for Ideas – April 2020

Response from A Place in Childhood (APiC)

We want to see NPF4 deliver inclusive, child friendly environments, where children and young people have opportunities to play, study, travel and live freely and safely. This includes both new developments and existing places, where we want to see places designed and developed in collaboration with children and young people to support their rights and wellbeing.

A Place in Childhood (APiC) (SC048635) is a Scottish Charitable Incorporated Organisation (SCIO) on a mission to promote and conceive Inclusive Child-Friendly Environments through a triad of practice-based research, advocacy and action. Our work and positions are underpinned by the UN Convention on the Rights of the Child and our team of Researchers, Planners and Creative Practitioners put the rights and wellbeing of children and young people at the heart of everything we do.

We are writing to submit our response to the [National Planning Framework 4](#) (NPF4) - Call for Ideas. Planning is fundamental to designing and developing high quality places that serve the needs of everyone, and regenerating communities fit for the future. We strongly believe that Scotland's planners have a pivotal role to play in

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upholding the rights and improving the livelihoods of our children and young people (CYP) who grow up in these places now and inherit them in the future.

We have seen our young citizens' access to the outdoors, freedom to play and appreciation and understanding of their built and natural environment in decline for quite some time. Access to inclusive child-friendly environments is a fundamental right and is proven to improve mental and physical health, aid learning, foster community spirit, increase social and economic value, reduce anti-social behaviour and crime, and promote creativity and innovation. It is a biological, psychological and social necessity and we believe that NPF4 offers an opportunity for Scotland to take the lead in driving forward change in the built environment to improve the quality of children and young people's lives in the long term.

We have refined the outcomes of our combined research with knowledge derived from our own participatory practice in Scotland to provide the following recommendations for NPF4 and its implementation within the Scottish planning system. These are based on the recommendations of our recent research report published with the RTPI and ZCD Architects - [Child Friendly Planning – A Review¹](#) - and redrafted in the context of NPF4. They can be found attached to this cover letter as Appendix 1. We have distilled these recommendations into critical actions for imminent implementation in the Scottish planning context, and support these actions with relevant examples of practice from across the UK to demonstrate the feasibility of implementing our proposals in Scotland.

At the core of our response are the principles of Susan Fainstein's [Just City Model²](#), which seeks to bring a greater element of social justice into the way planning operates and the outcomes it achieves. We argue that planning should focus on achieving the following three outcomes: **equity** (fairness in opportunities and outcomes), **diversity** and **democracy**:

Prioritising equity, diversity and democracy in planning ensures the outcomes of plans and new development meet as many needs as possible and lead to a more socially just city. In APiC's view, we need to ensure CYP's participation is prioritised,

¹ <https://aplaceinchildhoodorg.files.wordpress.com/2019/12/national-planning-policy-report.pdf>

² <https://www.planetizen.com/node/50215>

but not for its own sake; it needs to be supporting favourable outcomes. But the compelling evidence we already have around what makes environments child and youth friendly, and the fact that child-friendly cities are also healthy, sustainable and inclusive cities, cannot be ignored. We believe that a focus on equity in outcomes and opportunities and diversity in people and principles, will strengthen the democracy of the overall planning system and give a voice to CYP, whom enjoy fewer democratic rights and often get ignored by the planning system.

We are keen 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 your earliest convenience at anna.gaffney@aplaceinchildhood.org to discuss any aspect of this response in further detail.

Yours Sincerely



Anna Gaffney, on behalf of the APiC Board of Trustees.

| Summary of recommendations and proposed policies | |
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| Recommendations | Proposed Policies |
| Recommendation 1: National planning policy in Scotland should stipulate that children and young people have a right to be included in planning decision-making. | Children and young people's involvement in decision making |
| | Recognising diversity and difference in children and young people's participation |
| | Engagement of children and young people in development planning and management processes |
| | Prioritisation of views of children and young people in the planning system |

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| | Requirement to adhere to policies designed by children and young people |
| Recommendation 2: The NPF4 should give central prominence to children and young people's needs for movement and independence. | Giving due consideration to children and young people's mobility |
| | Reducing the dominance of the private vehicle |
| | Securing children and young people's access to public transport and active travel |
| 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 CYP, including ensuring the use of Play Sufficiency Assessments and Actions Plans. | Use of Play Sufficiency Assessments in Scottish Planning |
| | Hierarchies of play and recreation |
| | Integration of Play Sufficiency Assessments into development |
| Recommendation 4: NPF 4 should support local and regional planning policy and new developments proposals which aims for desirable social and health outcomes | Supporting the creation of healthy and equitable places |
| | Use of Equalities Impact Assessments and Children's Rights and Wellbeing Impact Assessments (CRWIAs) in development planning |
| | Use of Equalities Impact Assessments and Children's Rights and Wellbeing Impact Assessments (CRWIAs) in development management |

APIC RECOMMENDATIONS TO NPF 4

Recommendation 1: National planning policy in Scotland should stipulate that children and young people have a right to be included in planning decision-making.

NPF 4 presents a real opportunity for Scotland's planning system to take an important and progressive step in supporting the rights of CYP through specifically identifying their right to be included in the planning decision-making within NPF4 ([Article 12 of the United Nations Convention on the Rights of the Child or UNCRC](#)). No other national planning policy document within the UK is yet to endorse this right, and it would be a vital step at a national policy level to ensure the ongoing promotion of the rights of the child.

Furthermore, it would ensure full alignment with new stipulations in the Planning (Scotland) Act 2019 and the ongoing efforts to incorporate the UNCRC into Scots Law. It would also be integral to existing reporting requirement for Scottish Minister and public bodies to report progress on achieving children's human rights, in line with the Children and Young People (Scotland) Act 2014.

Planning remains a complex system to engage with due to the multiple levels of legislation and guidance to navigate which shape the processes by which decisions are ultimately made. Yet, when discussing place with CYP it is clear that many, if not all, have views they can communicate effectively using appropriate methods, and that could help inform more equitable planning.

There are many options that could be taken up through NPF4 to express this provision, and there are many examples of best practice from other countries that facilitate and encourage the participation of CYP in decision making structures of the planning process. Additionally, the Place Principle adopted by the Scottish Government ensures that children, as part of their respective communities, have the opportunity to contribute their voices to how places should be shaped, improved and protected. This reinforces the value of approaches to engagement such as the Place Standard tool, alongside further commitments to public health.

It is acknowledged that planning authorities are under immense pressure in relation to resources, and the inclusion of CYP's right to participate in the decision making frameworks of planning could be perceived as adding an increased level of complexity. Yet, a commitment by NPF4 to express CYP's right to be involved in planning decision making would create an opportunity for planning authorities to review current mechanisms of participation, and provide the necessary space to re-establish these as effective processes for communication, involvement and transparency. CYP also often have an intricate understanding of place that is overlooked and a sensitivity to many issues that adults may take for granted. Evidence shows that CYP can bring valuable and unique insights to planning – experiencing and moving around places in different ways to adults, they can represent an 'untapped' body of knowledge for planners. If processes are appropriately designed for their participation, CYP can offer new perspectives on planning, help planners take up new opportunities and overcome age-old challenges, and contribute innovative ideas for regeneration and development.

NPF4 could stipulate CYP's involvement in the decision making processes of planning as a necessity. To achieve this, a policy could be incorporated into NPF4 along the lines of the following:

Children and young people's involvement in decision making

The planning system must ensure that every opportunity is taken to engage the participation of children and young people in the decision-making processes of town planning, including in development planning and management. This will ensure children's perspectives influence the creation and regeneration of places to allow their full participation as active citizens.

Recognising Difference

It is vital that the planning system is attuned to the differences of need between children and young people. NPF4 must ensure that this difference is acknowledged and acted upon across the policy framework. The needs and requirements from

participation exercises differ, with teenagers often more able to express themselves verbally or in written forms. CYP of primary school age, however, may need to engage in more visual ways, and more time will need to be allocated to gather their views in a meaningful way.

The needs of CYP from the places they live also differ, and if consultation and participation is limited to one group, the needs of another may be ignored. The regularly cited example is the installation of a children's play area that no children use, due to it being designed for under 5s, but is assumed to work for a wider range of ages. There are also examples of playgrounds being located in places children cannot access or that are considered unappealing for other reasons (including because they prefer to play in places that are not as formal as playgrounds).

Another example is teenagers gathering in groups in town centres being moved along as they are perceived as a nuisance. Unfortunately, this is a fundamental misunderstanding of the nature of teenagers, which is to gather and socialise in larger groups than adults would choose. Article 15 of the UNCRC protects the right to gather, provided they are not breaking any laws. Ultimately, teenagers often have very few places they can go where their needs are catered for and they feel welcome. Meanwhile, creating spaces where all CYP are expected to undertake their leisure activities, such as a skate park adjacent to a playground, can lead to tensions as the needs of older CYP can dominate the interests of younger.

Whilst age is one factor, other protected characteristics and individual factors influence what CYP need from their place must also be considered. It is essential that planning policies and decision making at all levels are cognisant of these differences are implemented with this intention. We consider that the NPF4 could include a policy identifying this, with suggested wording below:

Recognising diversity and difference in children and young people's participation

The planning system must acknowledge the differences between children and young people, in relation to their needs of place and environment and their participation and engagement. Planning Authorities must ensure that

development planning and development management are cognisant of these differences in their operation and decision making, and work to ensure that the needs of these different age groups and other protected characteristics of the Equality Act are considered and enacted in the process of regeneration and creating new places.

Delivery in Development Planning and Development Management

Under the Planning (Scotland) Act 2019, Section 7, Local development plans, paragraphs 5 and 6, outlines the responsibilities of Planning Authorities to engage with children and young people in both the preparation of the evidence report and the overall content of the Local Development Plan itself.

Planning Authorities must further ensure that appropriate contacts within the childhood and youth sectors are made to ensure that opportunities for engagement and collaboration with CYP are well understood and facilitated. The relationships with these sectors must encourage further co-operation, the development of engagement skills, knowledge sharing and assist with the advocacy of the rights of CYP throughout the planning process.

The identification and preservation of play and sports grounds for CYP are an important feature of securing a diverse and interesting environments. However, they form only a small part of the environments that CYP experience, despite being the predominant focus of engagement with CYP under previous planning regimes. Therefore, it is vital that CYP are engaged on topics beyond the consideration of these types of places.

We believe this can be delivered through the new proposed development plan process through clear policy identification in NPF4, as suggested in the wording below:

Engagement of children and young people in development planning and management processes

Planning Authorities must engage with children and young people on relevant planning matters, such as those that concern the design and development of public and private places likely to be used by children and young people for play, recreation, leisure, assembly and study. Examples of such places include, but are not limited to, schools/educational facilities, parks, town centres, residential developments, mobility routes, open space and countryside. It is the responsibility of the Planning Authority to make appropriate links with schools, youth councils, support groups (such as young carers), local representatives of the Scottish Youth Parliament and other childhood professionals. These links will provide an array of opportunities that can aid in the meaningful engagement of CYP on relevant planning matters.

There are many ways that planning authorities can engage and collaborate with CYP to obtain their input and perspective on the key issues that shape their experience of place. The commissioning of a child and young person version of the Place Standard tool, as produced by Play Scotland and APiC, is a welcome move in this regard. These new tools could stand as one approach to begin incorporating children and young people's views into local and strategic planning in a structured way. The diverse range of experiences and methods already used by the childhood sector can further be drawn upon to ensure planners and planning authorities have the support they need to engage CYP. To recognise the value of this NPF4 could include a policy on this with the following suggested wording:

Prioritisation of views of children and young people in the planning system

The planning system requires planning authorities to ensure the views of children and young people are prioritised in the development of planning policy and spatial outcomes, as children and young people are more vulnerable as a group to the negative impacts of policy and design implementation across Scotland.

The outcomes of previous planning systems have resulted in places that are not inclusive to the needs of CYP as they are not perceived as safe, welcoming or

appropriate by CYP or their caregivers. Prioritising the perspectives of CYP will contribute to the creation of places which suit the needs of CYP and contribute to more inclusive environments. For example the inclusion of the perspectives of CYP in the development of transport and mobility policies would contribute to overcoming the existing barriers to the use of existing and new facilities by CYP and offer insight as to what improvements are necessary. Securing this approach could be identified in NPF4 as exemplified through the following wording:

Requirement to adhere to policies designed by children and young people

The planning system requires all planning applications to have respect to policies drafted with input from children and young people in the consideration of development proposals.

This will contribute to the development of a broader understanding of playable space and design in the built environment sector, as well as contributing to better design standards that improve the overall quality of formal play spaces and reveal new opportunities for informal play.

Creating opportunities for engaging CYP in Local Place Plans (LPPs) and other planning matters

In order to ensure that LPPs benefit all residents and users of the area they are based, the NPF4 must ensure that engagement with CYP is specified. Early engagement with CYP can provide vital information about place and provide the creative future visioning to help establish the baseline of considerations for the vision and content of LPPs.

The introduction of LPPs represents a huge opportunity in the development of place-based land use planning that better reflects the needs and ambitions of distinct communities. We believe undertaking mapping and visioning work with CYP should be the starting point of LPPs. CYP can often be bellwethers what is and is not

working in a community and can thus help communities and planners to survey the opportunities and challenges by giving their candid views before adult voices dominate the opportunities available to participate. It will also enable CYP to have their voices heard in ways that are better suited to them, allow for more meaningful contributions and do not place unfair expectations upon CYP to participate alongside adults who are more experienced in the planning process. CYP could also actively help facilitate the process and be involved from start to finish. As they stand to inherit the places planners design today, they have the greatest stake in the future of a place, and often the most granular understanding of the features of their neighbourhood.

There are two methods we would recommend for planners seeking to carry out mapping and visioning with CYP. Firstly, the Child and Young Person Mapping methodology used to develop the CYP Place Standard Tools and detailed in draft guidance is highly effective. Secondly, there are opportunities to follow the lead of prominent [child-friendly city practices in Boulder, Colorado](#) in the United States³. Here, they have created child- and family-friendly maps of the local area where children and families can easily find the places they can visit for play and recreation at low or no cost. Similar maps could be developed with and for teenagers. These two methods could be combined, so that the former shows what is good and what could be better in the area, whilst the latter is a dispensable document that helps CYP and families understand existing opportunities in their area for play, leisure, and rest.

Recommendation 2: The NPF4 should give central prominence to children and young people’s needs for movement and independence.

Existing Scottish Planning Policy and NPF3 supports improving active travel opportunities. However, these policies do not highlight the specific needs of children with regards to travel. Further development and commitment to this policy within NPF4 could lead to more sensitive exploration by planning authorities of how to

³ <http://www.growingupboulder.org/gubmap.html>

integrate active travel and inclusive mobility opportunities throughout their authority areas. It could also ensure clearer alignment with other initiatives such as safer routes to schools, and further emphasise the need for active travel and inclusive mobility (as those under 17 cannot drive, and older young people face significant cost barriers to driving).

A lack of attention to CYP's specific needs in this regard can reinforce the dependence they have on adults to actively participate in their environment and promote the prioritisation of the private vehicle as a mode of transport. The recently-doubled active travel budget by the Scottish Government, entrusted to Sustrans Scotland via Transport Scotland, is a positive step towards acknowledging the value of further active travel routes for CYP's health, wellbeing and independent mobility.

Despite the clear benefits of active travel for CYP's independence and mobility, there continues to be a policy gap in planning. Addressing this gap could offer the necessary clarity for ensuring the delivery of vital infrastructure to allow CYP to move more freely in the places they live, study and socialise. This policy gap could be closed though making the following commitment within NPF4, as expressed through the following wording:

Giving due consideration to children and young people's mobility

The planning system must ensure that children and young people's needs for movement and independence are given due consideration in relevant decision making processes, including in development planning and management, which influence how and where they are able to spend time and move between.

We draw your attention to the recent policy initiative of the Mayor of London, who published a [full guidance report on improving independent mobility across London](https://www.london.gov.uk/sites/default/files/ggbd_making_london_child-friendly.pdf)⁴. This serves as a policy-relevant blueprint, with multiple case studies of how mobility for CYP can be improved. We strongly recommend Scottish Government produce a Scotland-relevant piece of guidance that can incorporate more local conditions and

⁴ https://www.london.gov.uk/sites/default/files/ggbd_making_london_child-friendly.pdf

highlight good practice within the distinct nature of Scotland's towns, cities and villages.

Delivery in Development Planning and Development Management

The NPF4 must ensure that active travel and inclusive mobility (such as integrated and affordable public transport) is the primary focus of all transport-related policies in Development Planning. Scottish planning policy set out a clear position under the policy heading Promoting Sustainable Transport and Active Travel under NPF3, and now NPF4 must continue to build and enhance the commitments to reduce the use of private vehicles as originally set out. We consider that this could be identified in NPF 4 using wording as set out below:

Reducing the dominance of the private vehicle

In line with wider aspirations to reduce the dominance of the private vehicle within new developments, NPF4 requires Development Planning policies to ensure that prioritisation is given to active and public modes of transport, including walking and cycling and identification of a maximum allocation of parking spaces for development sites to facilitate the children and young people's need for movement and independence. The applicant will have to justify the need for additional parking spaces as necessary, and for every additional space identified an additional developer contributions to fund active travel infrastructure in line with development plan stipulations must be provided.

As part of ensuring that planning delivers useable active travel and inclusive public mobility throughout Scotland, it is vital that all development proposals which provide amenity, facilities and access to CYP ensure the delivery of safe and accessible links to active travel and public transport infrastructure. The purpose of this is to overcome existing perceptions relating to the safety of active travel, such as busy roads, dangerous or isolated pathways and disconnected routes to the places which CYP want or need to travel to. We consider that this could be expressed appropriately

through two policy additions to NPF4, using suggested policy wording below:

Securing children and young people's access to public transport and active travel

NPF4 requires that all planning applications that have an impact or requires consideration of transportation access must due consideration to the impacts on children and young people's ability to access active travel and public transport safely and regularly. Children and young people's access to such forms of transportation should be safeguarded or mitigated through the provision of an equal or improved alternative.

Planning applications must ensure that active travel and inclusive mobility opportunities are designed as such to ensure long term safety for use and access, minimal maintenance requirements and located to ensure maximum useage and links to the places children and young people use most regularly. This includes, but is not limited to, education facilities, public transport links, open and greenspace and shops and supermarkets.

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 CYP, including ensuring the use of Play Sufficiency Assessments and Actions Plans

The opportunities for CYP to access high quality public space for play, recreation, leisure and assembly (Articles 31 and 15 of the UNCRC) has been in notable decline across Scotland in for quite some time. A combination of societal expectations, commodification of land use and increasing traffic in Scotland's villages, towns and cities has meant that CYP are increasingly confined to designated environments to engage in play, recreation, leisure and assembly. Whilst the intentions behind making designated spaces for children are admirable, they continue to promote an assertion that designated spaces for children are the only spaces for children, and do not promote an inclusive pattern of accessibility or belonging in the wider

environment. We are delighted and heartened to see Play Sufficiency Assessments as new stipulations within the Planning (Scotland) Act 2019. These have been shown in in Wales to improve cross-sector collaboration, and provide clearer opportunities for all people with responsibilities towards CYP's environments to co-ordinate a rights-respecting local response. We believe the stipulations by Welsh Government that local authorities should have the freedom to determine what 'sufficient' means in their local area to be an appropriate and empowering response. In Scotland, this would allow for the wide ranging social and spatial perspectives of our communities to be valued and give local CYP the opportunity to help define what sufficient play and recreation opportunities look like for them. This brings the discussion beyond fixed equipment playgrounds and skate parks, to think more creatively about how the environment offers multiple affordances for CYP such as playful routes, co-designed outdoor hangout spaces, and opportunities for creative and open-ended experiences in nature.

Our concern with Play Sufficiency Assessments in Scotland is that they may be subsumed into Open Space Strategies. Whilst there may well be overlaps between the two, we want to emphasise that play and recreation is not a function of open space, but that open space is a place where CYP may choose to play. We propose a response to play sufficiency that puts local CYP in the driving seat to map existing provision and propose new ideas that could be integrated as part of other strategies and plans. In this way, LPPs could offer a supporting mechanism to play sufficiency, and enable a more empowered approach for local communities. We recommend the organisation [Ludicology's robust and child-centred approach to play sufficiency](#)⁵ in Wales and England; something that APiC would be delighted to help transfer to the Scottish context, working in collaboration with the play, child and youth sector, particularly Play Scotland who have unrivalled expertise in this area.

Use of Play Sufficiency Assessments in Scottish Planning

NPF4 considers the incorporation of play, recreation and assembling in public space to be essential to ensure the delivery of inclusive and safe places for children and young people. NPF4 requires development planning policy to

⁵ <https://ludicology.com/store-room/play-sufficiency-childrens-right/>

ensure the ongoing promotion and enablement of children and young people use of space the appropriate use of play sufficiency assessments and action plans to inform spatial planning strategies for new and existing places, developer requirements and contributions.

Delivery through the Development Planning and Management

Planning authorities and Local Development Plans (LDPs) should guide the delivery high quality public spaces and offer opportunities for CYP to engage in play, recreation, leisure and assembly. To this end, NPF4 should support the inclusion of hierarchies of play and recreation for new and existing places, to improve the quality of environments that CYPs experience as they live their lives. Hierarchies for play and recreation would identify the fundamentals of identifying playable streets, ensure that public spaces are prioritised above fixed equipment and natural and open spaces are integrated throughout places to offer improved affordances for CYP to spend time. Such hierarchies would also promote safe patterns of mobility for children which promote independence of movement. APiC would be happy to work with the Scottish Government to develop a Scotland specific hierarchy of play and recreation template which could be used and adapted by all planning authorities. NPF4 could ensure the delivery of such hierarchies through the inclusion of wording such as:

Hierarchies of play and recreation

NPF4 requires that hierarchies of play and recreation for new and existing places should be identified and integrated into Local Development Plans and applied as part of development design and layout. The hierarchies should be developed as part of engagement with children and young people and subject to ongoing reviews to identify further place-based solutions which are relevant to the experiences of children and young people and their communities.

APiC believes that planning applications should contain information that clearly identifies how the development design incorporates the hierarchy and supports the

use and access by CYP. There are opportunities to integrate such a hierarchy with other development requirements such as green/blue infrastructure networks to deliver high quality places which contribute to wider planning aims of environmental improvement, social cohesion, improved health outcomes and place resilience. Therefore, we recommend that NPF4 contains a policy provision for this and make use of the following suggested wording:

Integration of Play Sufficiency Assessments into development

NPF4 requires that proposals submitted for full planning permission integrate the hierarchy of play and recreation clearly into development layouts, to ensure that the needs of children and young people are incorporated into the design of places from the outset. Planning permissions in principle will necessitate the provision of the development layouts which integrate the hierarchy of play and recreation as part of conditions of any grant of consent.

Recommendation 4: NPF 4 should support local and regional planning policy and new developments proposals which aims for desirable social and health outcomes

The Scottish Planning system has been progressive in its acknowledgement of place and its influence on the health outcomes of society in recent years. NPF4 provides an opportunity for the planning system to define and further support the attainment of desirable social and health outcomes within planning policy and applications, and align the development process with wider aspirations for better wellbeing outcomes in society, which in turn benefit CYP.

Equalities Impact Assessments, Children's Rights and Wellbeing Impact Assessments (CRWIAs) and Place Standard Tools could form the basis for the identification of what desirable social outcomes would be in an area, which could cascade into place specific development planning and management policies. This has the advantage of improving the weighting of beneficial social and health outcomes as part of the planning decision making process, aligning them more closely with considerations given to economic growth and environmental

sustainability. Additionally robust community engagement with the participation of CYP, would ensure that the intricacies of the desirable social outcomes are understood in a place specific way. This has the benefit of ensuring that planning policy and subsequent decisions regarding development proposals are undertaken with the knowledge and evidence of what desirable social outcomes must be achieved and allows for better interrogation of whether proposals are aligned with those. We consider that NPF 4 should incorporate this provision as a principle policy as set out below:

Supporting the creation of healthy and equitable places

The planning system will support the creation of healthy and equitable places in Scotland, through supporting development which promotes improved social and wellbeing outcomes.

Delivery through the Development Planning and Management

In order to deliver this, the NPF4 must ensure that Development Planning and Development Management actively apply Equalities Impact Assessments and CRWIAs as part of the process of decision making. Development planning can use these assessments as part of the policy development process when undertaking community engagement, inclusive of the participation of CYP, in order to establish an evidence based understanding of what planning policy should be seeking to achieve in order to create better places to live and spend time. NPF4 should support planning authorities in taking this approach by including the following wording:

Use of Equalities Impact Assessments and Children's Rights and Wellbeing Impact Assessments (CRWIAs) in development planning

Regional Spatial Strategies and development planning should ensure the use of Equalities Impact Assessments and Children's Rights and Wellbeing Impact Assessments (CRWIAs) and other appropriate tools, as part of engagement work with local communities when establishing the policy aims

and intended outcomes of local development plans and associated documents. This is to ensure that planning is working to support the achievement of the desirable social outcomes associated with the community and its place.

We also consider that development management could request the use of such assessments as part the review and consideration of planning applications, in particular those which fall out with proposed development allocation areas or places without established communities. The use of such assessments would ensure that the proposed development is delivering the necessary desirable social and health outcomes in their function.

Use of Equalities Impact Assessments and Children's Rights and Wellbeing Impact Assessments (CRWIAs) in development management

Development management should ensure the use of Equalities Impact Assessments and Children's Rights and Wellbeing Impact Assessments (CRWIAs) and other appropriate tools, as part of the assessment of planning applications which may not be specifically identified for development within the Local Development Plan or are not covered by place specific policies which have been subject to such assessments.