

	Open Space Strategy Regulations	
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?	Agree.
2	Do you agree with the proposed definition of a) 'open space' b) 'green space' c) 'green infrastructure' d) 'green networks' e) 'ecosystem services'	Yes
3	Do you agree with proposed thresholds for open space audits in Draft Regulation 4(2)?	Yes, this reflects the approach taken in the last Moray Open Space Strategy.
4	a) Do you agree with suggested information to include about each open space (location, size and type)? b) Do you agree with Regulation 4(5) on the other information planning authorities may include in the audit?	Yes, this reflects the approach taken in the last Moray Open Space Strategy.
5	a) Do you agree with suggested approach to require locality level place based information? b) Do you agree with the three high level aspects that should be covered in these statements 'accessibility', 'quantity' and 'quality'?	For authorities with more rural areas providing information on an electoral ward basis could be difficult and resource intensive if open space in multiple small settlements required to be assessed. Therefore, allowing the Council to define appropriate areas is welcomed. Agree that accessibility, quantity and quality are covered in statements. This is similar to the approach taken in the last Moray Open Space Strategy.
6	Do you agree with the list of consultees for the open space audit?	Yes
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?	Agree
8	Do you agree Open Space Strategies should	Agree

	<p>a) include a statement setting out how they contribute to the outcomes?</p> <p>b) identify strategic green networks?</p> <p>c) identify how green networks may be enhanced?</p>	
9	Do you agree with the proposed consultation requirements on draft Open Space Strategies?	Agree
10	Do you agree with the proposed publication requirements for the OSS?	Agree
11	Do you agree the Regulations should set a 10 year minimum review period for updating open space audits and strategies?	Agree
	Play Sufficiency Assessment Regulations	
12	Do you agree with the proposed definitions? "children" "localities" "open space" "play opportunities"	Agree
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)?	Agree
14	Do you agree with the proposed requirement to assess play opportunities in respect of their suitability by age groups?	Agree – however guidance is required on how to identify what is suitable for different age groups.
15	<p>a) Do you agree to the proposed three aspects of assessment - 'accessibility', 'quantity' and 'quality?' and</p> <p>b) to provide them in written statements in respect of the totality of the local authority area and at each locality level?</p>	Yes – however guidance is required on how to assess different spaces particularly those that are not equipped play areas.
16	<p>a) Do you agree with the requirement to consult as part of the process of carrying out the play sufficiency assessment?</p> <p>b) Do you agree with the proposed list of consultees on play sufficiency assessment?</p>	Agree
17	Do you agree with the publication requirement for play sufficiency assessments?	Agree

	Impact Assessments	
18	Do you have or can you direct us to any additional information that would assist in finalising these assessments (BRIA, EQIA, CRWIA, ICIA)?	N/A
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 comments
20	Do you agree with the Fairer Scotland Duty screening and our conclusion that full assessment is not required?	No comments
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 comments
22	Any other comments	<p>The resource implications are considered to be significantly under estimated. Past experience in preparing Open Space Strategy has shown that significant time and resource is required in preparing the audit, assessing future requirements and developing the strategy.</p> <p>Concerned that there is a lack of guidance and good practice on the preparation of Play Sufficiency Assessments. The level of information currently available on how to assess play sufficiency makes it difficult to start preparation of these for inclusion within Evidence Reports. There are no details of transitional arrangements for Authorities who are currently preparing information for the Evidence Report in the next year.</p>