

# Scottish School Grounds Collective Position Statement on School Grounds

We commit to working together to improve the quality and use of all school grounds<sup>1</sup> across Scotland, ensuring that Scotland is the best place to grow up.







<sup>1</sup> Definition: 'School Grounds' is used as a generic and understandable term. It is a simplification of the overarching 'Outdoor areas within the Scottish Learning Estate.' School Grounds therefore includes all Early Years & Childcare, Primary, Secondary, College and Additional Support Need outdoor spaces.



# The Scottish School Grounds Collective will realise this commitment by the following collaborative actions:

1. Consulting on and renewing the School Premises (General Requirements and Standards) (Scotland) Regulations 1967 through the Scottish Parliament.

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2. Undertaking an updated survey on the area, character, provision, and use of school grounds in Scotland.

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3. Creating a suitable vision and design guidance for the creation and use of quality school grounds in Scotland for learning, play, sport, and health as well as vital spaces for community, climate and environmental improvements.

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4. Supporting and training our educators, teachers, and communities to ensure that all children and young people have daily access to outdoor learning, play and sport in school grounds.

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5. Seeking innovative new funding and addressing barriers to existing funding sources.

The organisations and individuals listed below are supporters of this call for action, and are actively working towards the 5 actions above.



Professor Greg Mannion, University of Stirling  
 Theresa Casey Consultancy  
 Juliet Robertson, D.Ed (Hon)  
 Farhana Mohammed Isa, University of Strathclyde  
 Susie Humble, Play Professional  
 Prof. John McKendrick  
 Awards Plus in Edinburgh and The Lothians  
 Learning for Sustainability Scotland  
 Scottish Advisory Panel for Outdoor Education  
 WOSDEC  
 Wilder Outdoor Education

Learning through Landscapes  
 Landscape Institute  
 Public Health Scotland  
 Keep Scotland Beautiful  
 Inspiring Scotland  
 Play Scotland  
 Choose Play  
 Woodland Trust  
 Greenspace Scotland  
 Scottish Outdoor Learning Association (SOLA)  
 Countryside Learning Scotland



# Policy Context of school grounds in Scotland

For children and young people in Scotland, school and early years grounds are crucial daily venues for learning, play, and sport. School grounds are a unifying feature of life for every child in Scotland, regardless of their challenges or privileges.

Every child in Scotland is entitled to outdoor learning, play in nature, and sport daily. This right is supported by laws and policies, including the United Nations Convention on the Rights of the Child, Learning for Sustainability entitlement, and our Play Strategy.

School grounds have the potential to significantly enhance children's physical health and mental wellbeing. They can lead the way in adapting to climate change and promoting biodiversity. These spaces protect children and school buildings from

extreme weather and provide habitats for nature. They should invite all learning community members to actively participate in discovering and co-producing solutions to the challenges faced by all communities across Scotland.

Children and young people's involvement in the improvement of school grounds contributes to making a range of children's rights a reality. This includes articles 12, 24, 29, as well as General Comments 17 (The Right to Play) and 26 (The Right to Good Environment, with a focus on Climate Change).

The intersection of equitable access and the policy goals of the Scottish Government means that school grounds offer a unique opportunity for significant return on investment.







## It is time to act and collaborate, to create a strong vision, regulation and detailed guidance for the design and use of school grounds across Scotland.

While there is abundant guidance on best practices for related areas, particularly in early years and play, this guidance is not binding. As a result, the construction and maintenance of school grounds are often the outcome of geography, history, and socioeconomics. School grounds are vulnerable to budget constraints, value engineering and a lack of prioritisation. Quality time in school grounds should be a daily experience for all children in Scotland, without prejudice.

Educators and teachers are expected to deliver outdoor learning experiences as part of Learning for Sustainability. They therefore require better spaces to provide these vital and progressive learning experiences. Recent research indicates that outdoor learning in school grounds has declined in primary and secondary

schools, highlighting the need to support professional practice and attitudes. The use of school grounds is intrinsically linked to their design and maintenance.

There is a notable lack of direct technical guidance for creating and maintaining these spaces and a dearth of current published vision and values around school grounds, despite considerable interest and support from the Scottish Government and other stakeholders.

We also have an opportunity to explore emerging ecosystem services funding models, health funding opportunities, philanthropic and corporate social responsibility funds. We are also aware of a need to reduce systemic barriers to existing and potential funding sources from outwith education.



# Current Scottish Regulations for school grounds

The School Premises (General Requirements and Standards) (Scotland) Regulations 1967 (“the Regulations”) form the current requirements for all school buildings and school grounds. Created over 50 years ago, these General Requirements are not fit for purpose.

[https://www.legislation.gov.uk/uksi/1967/1199/pdfs/uksi\\_19671199\\_en.pdf](https://www.legislation.gov.uk/uksi/1967/1199/pdfs/uksi_19671199_en.pdf)

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## Scottish Government Consultation 2017

In 2017 the Scottish Government undertook a consultation and published recommendations to improve the Regulations. The consultation and recommendations can be found here: <https://www.gov.scot/publications/consultation-document-updating-school-premises-general-requirements-standards-scotland-regulations/documents/>

There is a summary of the pertinent recommendations around the proposed updated Regulations in Appendix 1.





## Current Scottish School Grounds Guidance

The Regulations serve as an expectation of the basic requirements for all education settings. The guidance around best and expected standards therefore come through non-statutory Guidance.

The UK-wide 'Building Bulletins' served in the role of advising on quality of design and creation alongside the Designing School Grounds publication from the Department for Education. Both these documents have been deprecated on the UK Government website and removed from the Scottish Government website.

There are references to school grounds within many documents from the Scottish Government Early Years

team, the Scottish Futures Trust, and Architecture & Design Scotland, but they are much less detailed, mainly focus on Early Years, and are sparse when considering primary, secondary or additional needs schools.

Sport Scotland has planning and design guidance for sports facilities, published in 2007. However this pre-dates many of the policies around education, play and the learning estate in Scotland.

The current expectations around maintenance also require consultation. There is no current guidance about involving learners, maintenance for nature, climate adaptation and mitigation, or ensuring spaces are rich in learning and play opportunity.



# What has changed since 2017?

There have been at least 26 Scottish Government Policy and Strategy changes which improvements to school grounds can either assist in meeting, or the new Policy directly impacts how school grounds are created, used, and maintained. Very importantly this includes the declaring of the climate emergency and the formalisation of children and young people's Rights in Scotland.

There are many more changes in policy and strategy in which school grounds can assist or are influenced to a lesser extent.

Our Collective suggests that the Consultation and Recommendations of 2017 should broadly be kept. However, there is clearly a need for additional requirements around climate change, the mental health crisis, nature emergency and to reflect all the changes in policy or strategy from Scottish Government.

What has become clear is that the role of greenspace for education, climate adaption, nature, health, and community cohesion has never been more prominent. We have a significant opportunity to draw these changes into one totemic set of new Regulations and Strategies to drive forward a better future for all our children and young people.





# What has not changed since 2017?



The completion of the update to the Regulations has not been completed. Our collective feels this is an urgent matter, laying foundations for the changes and resources required to meet our ambitions.

Funding for school grounds has never been prioritised and separated from wider funding of the learning estate, unlike many of our European neighbours. Budgets to create and maintain school grounds therefore remain very small or even non-existent unless vital for the safety of our children. In addition, we have never explored funding from out with the Education budgets, despite the growth in innovative green finance, ecosystems services, health funds and more.

We lack the more detailed guidance, indicators, and quality case studies to indicate what a 'good' school ground is. The refreshing of this guidance, building on the UK Building Bulletins of the past, is a significant barrier to better school grounds.

Finally, the children and young people who use our school grounds daily have not changed their view. In fact, they remain steadfast and passionate about the role of school grounds to the benefit of their lives now and in the future.



## A. The Scottish Policy and Strategy Changes since 2017

### Children's Rights

General Comment No. 26 (2023) on children's rights and the environment with a special focus on climate change

<https://www.ohchr.org/en/documents/general-comments-and-recommendations/crccgc26-general-comment-no-26-2023-childrens-rights>

Scotland and the sustainable development goals: a national review to drive action

<https://www.gov.scot/publications/scotland-sustainable-development-goals-national-review-drive-action/pages/14/>

### Learning Estate

Scottish Learning Estate Strategy

<https://ltl.org.uk/wp-content/uploads/2022/05/scotlands-learning-estate-strategy.pdf>

The Suitability Core Fact: Building Better Schools

<https://ltl.org.uk/wp-content/uploads/2022/05/scotlands-learning-estate-strategy.pdf>

Learning Estate Investment Programme

<https://www.scottishfuturetrust.org.uk/publications/documents/leip-programme-overview>

Scotland's Schools for the Future

<https://www.scottishfuturetrust.org.uk/publications/documents/scotlands-schools-for-the-future-interim-findings-report>

Commission for Land-Based Learning Review

<https://www.gov.scot/publications/commission-land-based-learning-review-report-scottish-ministers/>



## Appendices

### Climate Change

Climate Ready School Grounds

<https://ltl.org.uk/projects/climate-ready-school-grounds/>

A Just Transition

<https://www.gov.scot/policies/climate-change/just-transition/>

Securing a green recovery on a path to net zero: climate change plan 2018-2032 – update

<https://www.gov.scot/publications/securing-green-recovery-path-net-zero-update-climate-change-plan-20182032/>

Climate Ready Scotland: Second Scottish Climate Change Adaptation Programme

<https://www.gov.scot/publications/climate-ready-scotland-second-scottish-climate-change-adaptation-programme-2019-2024/>

Climate Ready Scotland: climate change adaptation programme 2019-2024

<https://www.gov.scot/publications/climate-ready-scotland-second-scottish-climate-change-adaptation-programme-2019-2024/>

### Play

National Position Statement: Outdoor Play and Learning

<https://www.inspiringscotland.org.uk/scotlands-national-position-statement-on-outdoor-play-and-learning/>

Revised Play Strategy & Action Plan

<https://www.gov.scot/publications/play-strategy-scotland-action-plan/>

Play Sufficiency Assessments

<https://www.playscotland.org/projects/play-sufficiency-assessments/>

Free to Play – a guide to creating accessible and inclusive public play spaces

<https://www.inspiringscotland.org.uk/publication/free-play-guide-creating-accessible-inclusive-public-play-spaces/>

Inspiring Inclusive Play Design

<https://ltl.org.uk/wp-content/uploads/2022/05/inspiring-inclusive-play-in-scotland.pdf>



## Appendices

### Health

The Power of Play for Children and Young People's Positive Mental Health

<https://ltl.org.uk/wp-content/uploads/2022/05/the-power-of-play-for-childrens-positive-mental-health.pdf>

New Mental Health Strategy

<https://www.gov.scot/collections/mental-health-strategy/>

Active Scotland Delivery Plan

<https://www.gov.scot/publications/active-scotland-delivery-plan/>

### Early Years

Realising the Ambition

<https://education.gov.scot/media/3bjpr3wa/realisingtheambition.pdf>

Space to Grow: Design Guidance for Early Years and Childcare and Out of School Care Settings

<https://ltl.org.uk/wp-content/uploads/2022/05/space-to-grow-design-guidance-for-early-learning-and-childcare-and-out-of-school-settings.pdf>

Out to Play: Practical Guidance for creating outdoor play experiences in early learning and childcare

<https://ltl.org.uk/wp-content/uploads/2022/05/out-to-play-practical-guidance-on-creating-outdoor-play-experiences-for-children.pdf>

### Education

Putting Learners at the Centre: Towards a Future Vision for Scottish Education

<https://www.gov.scot/publications/putting-learners-centre-towards-future-vision-scottish-education/>

Revised Learning for Sustainability Action Plan

<https://www.gov.scot/publications/target-2030-movement-people-planet-prosperity>

Successful Approaches to Outdoor Learning – HMIE Thematic Report

<https://education.gov.scot/media/wonmplgv/successful-approaches-to-learning-outdoors23.pdf>



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Revised Standards for Provisional and Full Registration, GTCS

<https://www.gtcs.org.uk/professional-standards/professional-standards-for-teachers/>

Children's Parliament Investigates: Learning for Sustainability

[https://www.childrensparliament.org.uk/wp-content/uploads/Learning\\_for\\_Sustainability\\_Childrens\\_Parliament\\_Report\\_2022\\_Small-1.pdf](https://www.childrensparliament.org.uk/wp-content/uploads/Learning_for_Sustainability_Childrens_Parliament_Report_2022_Small-1.pdf)

Outdoor Learning: Closing the Attainment Gap in Primary School Children in Scotland

<https://www.forestresearch.gov.uk/publications/outdoor-learning-closing-the-attainment-gap-in-primary-schoolchildren-in-scotland/>

## Nature & Biodiversity

Nature Base Solutions Briefing for Elected Members

[https://www.improvementservice.org.uk/\\_data/assets/pdf\\_file/0019/26434/EM-Briefing-Nature-Based-Solutions.pdf](https://www.improvementservice.org.uk/_data/assets/pdf_file/0019/26434/EM-Briefing-Nature-Based-Solutions.pdf)

Biodiversity Strategy to 2045: Tackling the Nature Emergency

<https://www.gov.scot/publications/scottish-biodiversity-strategy-2045-tackling-nature-emergency-scotland/>

Scottish Forestry Strategy 2019–2029

<https://forestry.gov.scot/forestry-strategy>

## Planning & Design Standards

Place Standard Tool

<https://www.ourplace.scot/>

Place Standard Tool for Children and Young People

<https://www.ourplace.scot/place-standard-tool-children-and-young-people>

Place Standard Tool with Climate Lens

<https://www.ourplace.scot/Place-Standard-Climate>

National Planning Framework 4, including an Infrastructure Levy

<https://www.gov.scot/publications/national-planning-framework-4/Health>

## B. Global Policy and Strategy Changes since 2017

1. Declaration of the Climate Emergency, 2019
2. Greening Education Partnership, UNESCO, 2022:  
<https://unesdoc.unesco.org/ark:/48223/pf0000390028>
3. Green School Quality Standards, 2024  
<https://unesdoc.unesco.org/ark:/48223/pf0000390022>
4. Greening Curriculum Guidance, 2024  
<https://www.childrenandnature.org/greening-school-grounds-outdoor-learning-global-action-agenda/>
5. Greening School Grounds & Outdoor Learning: Global Action Agenda  
<https://www.gov.uk/government/publications/sustainability-and-climate-change-strategy>
6. Department for Education (England), Sustainability and Climate Change Strategy, 2022  
<https://www.gov.uk/government/publications/sustainability-and-climate-change-strategy>





## C. Current or Unchanged Guidance

Below is a summary of the current guidance on the outdoor areas of the learning estate in Scotland.

### School Grounds

The Good School Playground Guide

<https://ltl.org.uk/resources/the-good-school-playground-guide/>

Play Out of Hours

<https://www.gov.scot/publications/play-strategy-play-out-hours/>

School Playing Fields – Planning & Design Guidance (Sport Scotland)

<https://sportscotland.org.uk/facilities/design-guidance/school-sport/school-playing-fields-planning-and-design-guidance/>

### Learning for Sustainability

How Good is our school (4<sup>th</sup> Edition)?

[https://education.gov.scot/media/2swjmnbs/frwk2\\_hgios4.pdf](https://education.gov.scot/media/2swjmnbs/frwk2_hgios4.pdf)

Summary of outdoor learning and play references withing HGIOS4:

<https://ltl.org.uk/wp-content/uploads/2022/05/how-good-is-our-school-outdoor-learning-and-learning-for-sustainability.pdf>

How good is our early learning & childcare?

<https://education.gov.scot/inspection-and-review/inspection-frameworks/how-good-is-our-early-learning-and-childcare/>

Summary of outdoor learning and play references withing HGIOELCC:

<https://ltl.org.uk/wp-content/uploads/2022/05/hgioelcc-outdoor-learning-references.pdf>

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### Health and Wellbeing

Greenspace Design for Health and Well-being

<https://ltdl.org.uk/wp-content/uploads/2022/05/greenspace-design-for-health-and-wellbeing.pdf>

Innovative NHS Greenspace in Scotland

[https://cdn.forestresearch.gov.uk/2022/02/fr\\_innovative\\_green\\_spaces\\_obrien\\_2015.pdf](https://cdn.forestresearch.gov.uk/2022/02/fr_innovative_green_spaces_obrien_2015.pdf)

NHS Greenspace – Good Design of the Outdoor Estate

<https://nhssustainabilityaction.co.uk/wp-content/uploads/2021/10/Design-Review-GEP-STUDY-FINAL.pdf>

### Green infrastructure

Green infrastructure – Design and Placemaking

<https://www.gov.scot/publications/green-infrastructure-design-placemaking/pages/0/>

Place Standard with Climate Lens

<https://www.ourplace.scot/Place-Standard-Climate>

Making the most of communities' natural assets: green infrastructure

<https://www.gov.scot/publications/making-communities-natural-assets-green-infrastructure/>





## D. School Premises (General Requirements and Standards) (Scotland) Regulations 1967

Below is a summary of the relevant sections for outdoor spaces and storage in the current School Premises (General Requirements and Standards) (Scotland) Regulations 1967.

The full Regulations can be read at: [https://www.legislation.gov.uk/uksi/1967/1199/pdfs/uksi\\_19671199\\_en.pdf](https://www.legislation.gov.uk/uksi/1967/1199/pdfs/uksi_19671199_en.pdf)

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### Part III: Standards

#### Sites for Primary and Secondary Schools:

1. (1) Every Primary School shall have a site of not less than the area specified in Table 1 according to the number of pupils for which the school is designed except where the provisions of regulation 7(6) applies.

Table I

Number of Pupils	Area (Acres)
25 or less	0.25
26-60	0.5
61-140	1
141-315	1.5
316-450	2
451 or more	3

#### Sites for playing fields.

2. (1) Every primary school shall have available and in close proximity to it playing fields not less that the area specified in Table IV according to the number of pupils for which the school is designed except where the provisions of regulation 8(4) apply.

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**Table IV**

<b>Number of Pupils</b>	<b>Area (Acres)</b>
26-60	0.25
61-140	0.5
141-315	0.75
316-450	1
451 or more	1.5

### **Sites for playing fields.**

- A. (2) Every secondary school shall have available and in close proximity to it playing fields not less than the area specified in Table V according to the number of pupils for which the school is designed except where the provisions of regulation 8(4) apply.

Provided where the number of pupils is less than 320 the area of the playing fields shall be such as may be approved in each case.

**Table V**

<b>Number of Pupils</b>	<b>Area (Acres)</b>
320-500	4
500-750	6
751-100	8
Each additional 200 over 1000	1

### **Storage Accommodation**

19. (2) In every school there shall be suitable facilities for the hanging and drying of pupils outdoor clothing and for storing pupil's belongings.

### **Outdoor educational and recreational activities**

20. At every school there shall be provided immediately adjacent to the school building an outdoor or outdoor areas laid out and surfaced for education and recreational activities.



# E. Summary of the 2018 Consultation

The summary below focuses only on the outdoor element of the consultation and following recommendations. It is only a summary, and the full Consultation Response Analysis should be read by interested parties.

You can read it here: <https://www.gov.scot/publications/updating-school-premises-general-requirements-standards-scotland-regulations-1967-analysis/>



### Question 3 - Outdoor Education and Recreational Areas.

Do you agree that this Regulation adequately covers the requirements for outdoor educational and recreational areas? If not, why not?

The pertinent main recommendations here were:

- ensuring that the outdoor areas are not secondary to the buildings,
- that further guidance on outdoor space was needed,
- that the guidance should be cognisant of the Learning for Sustainability Vision and Strategy,
- that minimum areas regulations needed more detail and should be strengthened around areas beyond functional (car parking, vehicle access etc) and reflect learning for sustainability and play policies.

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### Question 7 – Sites for Playing Fields.

Do you agree that if there is a mixture of grass pitches and SP then the area required in some circumstances can be less than that currently defined for grass pitches? If not, why not?

The pertinent main recommendations here were:

- the regulations may benefit from articulating more clearly areas of grass and synthetic pitches,
- that the areas of ‘playing fields’ should be recognised beyond sport and a strengthening of guidance around spaces for learning, play, and health and wellbeing,
- that school grounds should be open to the community for use out of hours.

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### Question 13 - Sites for Primary and Secondary Schools.

Do you agree that this Regulation can be removed? If not, why not?

The pertinent main recommendations here were:

- That minimum area requirements should be maintained to prevent schools being squeezed onto sites which were not big enough.
- That the area provisions should now include requirements for play and learning spaces, not just sports.

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### **Question 14 - Playroom accommodation in nursery schools and classes.**

Do you agree that this Regulation and all other reference to ELC within the Regulations is no longer required and can be removed? If not, why not?

The pertinent main recommendations here were:

- There is not a minimum outdoor space requirement in early years & childcare settings.
  - That 'Space to Grow' is not mandatory.
  - That early years settings within schools or school grounds needed to have complimentary regulations and not be in conflict or separately regulated when building a new school.
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### **Question 18 - Storage Accommodation.**

Do you agree that this Regulation can be removed? If not, why not?The pertinent main recommendations here were:

- That Regulation 19 cannot be removed as too many schools already lack enough space for storage of outdoor clothing, bags etc.
  - It was noted that there is regulatory provision for external stores for sports equipment, and that this could be extended to outdoor learning and play equipment storage.
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### **Question 22 - Application of the Regulations to Independent Schools.**

Do you agree that the new Regulations should apply to Independent Schools? If not, why not?

The pertinent main recommendations here were:

- That it was agreed that the Regulations should apply to Independent schools
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### **Question 25 – Are there any aspects of a child's rights or wellbeing that you think might be affected either positively or negatively by the proposals covered in this consultation?**

- The pertinent main recommendations here were:
  - That the Rights of the Child should be the foundation of the revised Regulation
  - That the Rights of the Child included a significant element of health and wellbeing, as well as Education.
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## Learning through Landscapes

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