

Response ID ANON-H2DX-F6VH-G

Submitted to Proposals to update the School Premises Regulations
Submitted on 2026-03-31 13:04:36

Questions 1-12

1 Do you agree that adding a link to Building Bulletin 93 for Regulation 24 (Acoustic Conditions) adequately covers the requirements for acoustic conditions?

Not Answered

If not, why not?:

2 Do you agree that Regulation 25 (Water supply) adequately covers the requirements for water supply?

No

If not, why not?:

This Regulation should also specify requirements for access to available water supply in outdoor spaces as well as inside school buildings, both for pedagogical reasons and for drinking purposes.

Learning for Sustainability is an educational priority in Scotland and an entitlement for all learners (Scottish Government Learning for Sustainability Action Plan 2023-2030). This includes learning about, in and through the outdoors. Outdoor spaces are therefore considered an integral learning environment for schools and access to water outdoors is required, for example, for drinking, crop growing, hygiene, play, and site maintenance.

3 Do you agree that the new Regulations should apply to grant-aided schools?

Yes

If not, why not?:

4 Do you agree that Regulation 14 (Kitchen Premises) can be retained?

Yes

If not, why not?:

5 Should Regulation 20 (Outdoor education and recreational areas) be retained and be updated to require schools to have a mix of outdoor environments to further support the delivery of learning, play, sport and access to nature?

Yes

If not, why not?:

We agree that schools should be required to have a mix of outdoor environments to further support the delivery of learning, play, sport and access to nature.

The provision of outdoor educational and play-based experiences are entitlements in Scotland's Curriculum for Excellence for children aged 3-18 (Scottish Government, 2016 Vision 2030+ Concluding report of the Learning for Sustainability National Implementation Group) and outdoor learning is also embedded across the Professional Standards for teachers by the General Teaching Council for Scotland (GTCS 2021).

Suggested additions to the regulations are:

- Specify the need for a 'flexible, nature-rich multi-use' mix of outdoor environments to support all the purposes identified and enable more learning to be taken outside. Learning for Sustainability is an educational priority in Scotland and an entitlement for all learners (Scottish Government Learning for Sustainability Action Plan 2023-2030). This includes learning about, in and through the outdoors.

The NatureScot Research Report 1313 (2023) - Teaching, learning and play in the outdoors: a survey of provision in Scotland in 2022 indicated a need to increase outdoor learning provision.

Learning through Landscape's 2025 Scottish School Grounds Survey - <https://ltl.org.uk/projects/scottish-school-grounds-survey/> Point 3.110 stated that "diversity of grounds was clearly related to whether the grounds were judged to be of used for 'learning for sustainability' (Table 3.10): more diverse grounds were much more likely to be used for 'learning for sustainability'."

- Outdoor learning and play specifically require access to natural features and spaces. Evidence indicates the importance of ensuring children have access to nature and natural areas; this was considered essential to promote health and wellbeing, play, socialisation and for children to learn to take risks. (Christie and Higgins 2020, Educational outcomes of Learning for Sustainability).

- Specify the requirement to respond to climate change impacts such as flooding and high winds, particularly through adaptation and mitigation initiatives that prioritise nature-based solutions. This will address the needs of pupils, staff and the wider community both now and into the future, and can also provide valuable learning opportunities for pupils (Learning through Landscapes/Architecture and Design Scotland).

6 Do you agree that if there is a mixture of grass pitches and synthetic pitches then the area required in some circumstances can be less than that currently defined for grass pitches?

No

If not, why not?:

- This change of requirement based on type of surface, with synthetic pitches counting as twice the area of grass pitches, can encourage disposal of land that cannot be brought back into use by the school should it be required in the future. The Learning through Landscapes School Grounds Survey 2025 stated that 16% of secondary and 15% of primary schools report that they have lost school grounds to building development in the last 20 years.
- There should be a requirement for a flexible, nature-rich multi-use mix of outdoor environments in schools to support learning, play, sport and access to nature. This will allow for change of use and change of climate in the period over which these regulations will apply.

7 Do you agree that accommodation metrics is an appropriate method to calculate the educational accommodation required?

Yes

If not, why not?:

8 Do you agree that the number of appliances per pupil as set out in Regulation 15 (Sanitary accommodation for pupils) are still appropriate?

Not Answered

If not, why not?:

9 Do you agree that these proposals cover the modern requirements for toilet and washing facilities?

Not Answered

If not, why not?:

10 Do you agree that Regulation 18 (Medical inspection and rest room accommodation) covers the requirements for medical inspection and rest room accommodation?

Not Answered

If not, why not?:

11 Do you agree that wellbeing spaces, including nurture spaces, should be included in the regulations?

Yes

If not, why not?:

- The proposed updated regulations imply that wellbeing spaces and nurture spaces will be inside buildings. This should be amended to include the possibility of safe, calming and quiet outdoor nurture spaces, as considerable evidence suggests that access to Nature is beneficial to health and wellbeing.

12 Do you agree that the updated regulations should include a principle based requirement for digital infrastructure and connectivity in all schools?

Yes

If not, why not? Please provide examples of how digital provision supports educational outcomes in your context.:

Principles for digital provision should include consideration of, and provide opportunities for learning about, ethical issues such as online safety, and the growing impact of the use of Artificial Intelligence on energy consumption and water usage.

Questions: 13-25

13 Do you agree that Regulation 21 (Lighting) covers the requirements for lighting?

Not Answered

If not, why not?:

14 Do you agree that Regulation 22 (Ventilation) should be retained and updated?

Not Answered

If not, why not? :

15 Do you agree Regulation 23 (Heating) can be retained and updated?

Not Answered

If not, why not?:

16 Do you agree that Regulation 4 (General Requirements) can be removed?

Not Answered

If not, why not? :

17 Do you agree that Regulation 7 (Sites for primary and secondary schools) can be removed?

Not Answered

If not, why not?:

18 Do you agree that Regulation 11 (Educational accommodation in schools providing both primary and secondary education) should be removed?

No

If not, why not? :

• The removal of statutory requirements for the area of school sites risks leading to unsuitable sites being used for building in some Local Authorities, and the school grounds potentially being inadequate for the Learning for Sustainability and outdoor learning needs of pupils. Already, as stated in the Learning through Landscapes School Grounds Survey 2025, 16% of secondary and 15% of primary schools report that they have lost school grounds to building development in the last 20 years. Size of outdoor space is particularly important in urban areas and in areas of high deprivation where access to nature is already restricted.

19 Do you agree that Regulation 12 (Playroom accommodation in nursery schools and classes) is no longer required and can be removed, and that ELC settings, including those housed within school buildings should be specifically excluded in the updated Regulations?

Not Answered

If not, why not?:

20 Do you agree that Regulation 13 (Educational accommodation in special schools) should be removed?

Not Answered

If not, why not?:

21 Do you agree that Regulation 16 (Washing accommodation for pupils) is no longer required as it is met within the revised toilets and washing facilities Regulation?

Not Answered

If not, why not? :

22 Do you agree that Regulation 17 (Accommodation for staff) can be removed?

Not Answered

If not, why not?:

23 Do you agree that Regulation 19 (Storage accommodation) can be removed?

Not Answered

If not, why not?:

24 Please tell us about any potential equality impacts, either positive or negative, that you consider the proposals in this consultation may have, with reference to the 'protected characteristics' listed. Please be as specific as possible.

Please tell us about any potential equality impacts, either positive or negative, that you consider the proposals in this consultation may have, with reference to the 'protected characteristics' listed above. Please be as specific as possible.:

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?

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?:

- These Regulations should include a stronger emphasis on the needs of children and young people with design of Buildings and Grounds following on from those needs. Priority should be placed on making changes that support better educational outcomes for children and young people.
- Every child in Scotland is entitled to Learning for Sustainability, outdoor learning, play in nature, and sport daily. These rights are supported by laws and policies, including the United Nations Convention on the Rights of the Child, Learning for Sustainability entitlement, and Scotland's Play Strategy.
- Meaningful engagement of children and young people, and co-design, should be a specified element in the process of developing school buildings and grounds in both existing schools and new build (Scottish Government Learning for Sustainability Action Plan 2023-30)
- Children and young people's voices are strong and clear regarding desire for access to Learning for Sustainability in their everyday learning opportunities. Scottish Children's (2025) Parliament Phase 3 Learning for Sustainability Report (<https://www.childreparliament.org.uk/wp-content/uploads/Learning-for-Sustainability-Phase-3-Report-Childrens-Parliament-2025.pdf>). They also strongly express the issue of eco-anxiety. The lack of emphasis on nature and climate impacts in these consultation proposals could have long-term negative impacts on children and young people's physical and mental health and wellbeing.

About you

What is your name?

Name:
Cecilia Manosa Nyblon

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:
Learning for Sustainability Scotland - UN University recognised Regional Centre of Expertise on Education for Sustainability, University of Edinburgh

Further information about your organisation's response

Please add any additional context:

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response with name

Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

What is your email address?

Email:
ceciliananosa@lfsscotland.org

Where did you hear about this consultation?

Scottish Government website

If other, please say where::

Evaluation

How satisfied were you with this consultation?

Neither satisfied nor dissatisfied

Please enter comments here.:

How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?

Neither satisfied nor dissatisfied

Please enter comments here.: