



SCOTTISH EXECUTIVE
Development Department

PLANNING

Draft Scottish Planning Policy 21: Green Belts

*Analysis of Consultation
Responses*

April 2006



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EXECUTIVE SUMMARY

The consultation on the draft SPP on Green Belts began in August 2005 and attracted 173 responses (Individual 81, Planning authority 24; Amenity group 20; Community council 16; Business & developer 12; Professional 11; National & regional agency 8; Other 1). Roughly half of these responses (85) were submitted in a standard form suggested by the Scottish Green Belt Alliance, largely by individuals.

There is wide support for Scotland's elderly green belt policy to be restated in the SPP series. Nearly all responses have views on the main objectives, many seeking a firmer line on sprawl and coalescence. There is a lot of comment about boundaries, timeframes, suitable uses in the green belt, land release, consistency between authorities, and the scope for applying green belt policy to some of our smaller settlements.

There is a gap here between achieving greater clarity and resilience and the near-inviolability that some are seeking. Green belts clearly continue to enjoy support and are valued as a well-recognised planning tool by organisations and the public, even though debate surrounds them. Strong guidance is sought, based on justifiable landscape and planning grounds, to define where development can and cannot take place in the longer term.

Opinions differ on the clarity of the draft SPP. Responses highlight the need for green belt policies to be firm and clear, since they will be relied on for guidance in development plans and deciding planning applications.

Respondents want more about the way green belt policy should link to other Scottish Planning Policies for housing, other land uses, and rural development. Some think community involvement should get stronger signals and more guidance in the document.

Many responses see green belt policy as largely about quality issues like settlement identity. Far from being just a planning tool, green belts have taken on a physical reality and a symbolic importance. Because individuals and businesses have now taken account of the green belt in their life choices and investment decisions, they are reluctant to see it tampered with or taken away.

Nevertheless, there is plenty of evidence that people from different interest groups are willing to engage with other points of view. The issues that most respondents are concerned with are mainly to do with quality and practicality. And many in the business of development and planning have suggestions that focus on precisely these factors.

In short, analysis shows that while there is broad support for many essentials of green belt policy, a few fairly well defined snagging-points in the present draft can be identified and these are detailed in this report.

OUTLINE OF THE RESPONSES

1. The consultation on draft Scottish Planning Policy 21: Green Belts attracted 173 responses from a wide range of groups, individuals and organisations. This is a lot more than other recent SPP consultations such as SPP15: Rural Development.

2. It is worth making the point right away that comments across the range of respondents support many of the draft SPP's key elements. That the Scottish Executive should now take steps to renew and clarify this longstanding policy instrument is welcomed almost unanimously, even though there are different views on whether ideas about its limitations are being carried too far or not far enough. And there is remarkable agreement from different kinds of respondent about large parts of the document. There is a gap of course between greater clarity and permanence and the inviolability sought by some.

3. Beyond this, there is a focus on boundary treatment, release mechanisms, consistency between one area and another, and the scope for greater use of the green belt as a well-understood way to meet similar objectives around smaller settlements.

4. As ever, the devil is in the detail. Operating close to the issues, some respondents in the development, community and planning fields feel that greater clarity will be needed to guide them over the uncertainties. Others want a greater emphasis on quality and design. Others want closer integration between green belt policy and other Scottish planning policies. Before we explore these views further, we can look more closely at the different sources of the responses received.

Origin of responses

5. Responses come from a wide range of interests and can be grouped into these categories:

NUMBER OF RESPONSES	
Individual (some with more than one per response)	81
Planning & national park authorities & joint plan teams	24
Environment & heritage groups	20
Community councils	16
Businesses & developers	12
Planning and related professionals	11
National & regional agencies	8
Other	1
TOTAL	173

Roughly half of the responses (85) were submitted in a standard form suggested by the Scottish Green Belt Alliance and of these the vast majority come from individuals (75 responses). Standard responses also make up just over half of the responses from Community Councils (9). One standard response is from an environment and heritage group.

Individuals

6. As the table shows, the consultation attracted a strong return of 81 responses from individual members of the public. 75 of these responses have been made in the standard form suggested by the Scottish Green Belt Alliance, with occasional additions or deletions. Responses from individuals come almost exclusively from areas with an existing green belt, with clusters of responses from Ayr, Helensburgh and the Clydebank / Dalmeir area west of Glasgow. There is little response from individuals in Edinburgh (2) or green belt areas in central Scotland, and a low response in Aberdeen (4).

Planning authorities, national parks, joint plan teams

7. 22 of Scotland's 32 local authorities have responded to the consultation. The local authorities that currently contain green belts are well represented, but responses have also been received from authorities without green belts such as Angus and Shetland. Both the Glasgow and Clyde Valley and Ayrshire joint structure plan joint committees have responded to the consultation.

Environment & heritage groups

8. The responses from environment and heritage groups can be arranged in three broad strands. Just under half come from local groups associated with a particular geographical area and covering a variety of environmental and heritage interests (e.g Inveresk Village Society, Moray Friends of the Earth). A similar number are from groups with a specific green belt focus like the Scottish Green Belt Alliance and the Helensburgh Green Belt Group. A smaller number of responses come from national organisations like The Scottish Civic Trust and the Ramblers' Association.

Community councils

9. Over 15 community councils have responded to the consultation. They are predominantly from communities in existing green belts and more than half the responses have been submitted in the standard form suggested by the Scottish Green Belt Alliance.

Planning and related professionals

10. Just under half of the responses in this category are from professional associations such as the Royal Incorporation of Architects in Scotland and the Royal Town Planning Institute in Scotland), but planning consultants are also well represented. Two chartered town planners respond individually to the consultation.

Business & developers

11. Housebuilders account for most of the responses in this category. The rest come from what could be described as trade-related groups or organisations such as the British Holiday & Home Parks Association Ltd. An estates-related response from Glasgow University is also included here.

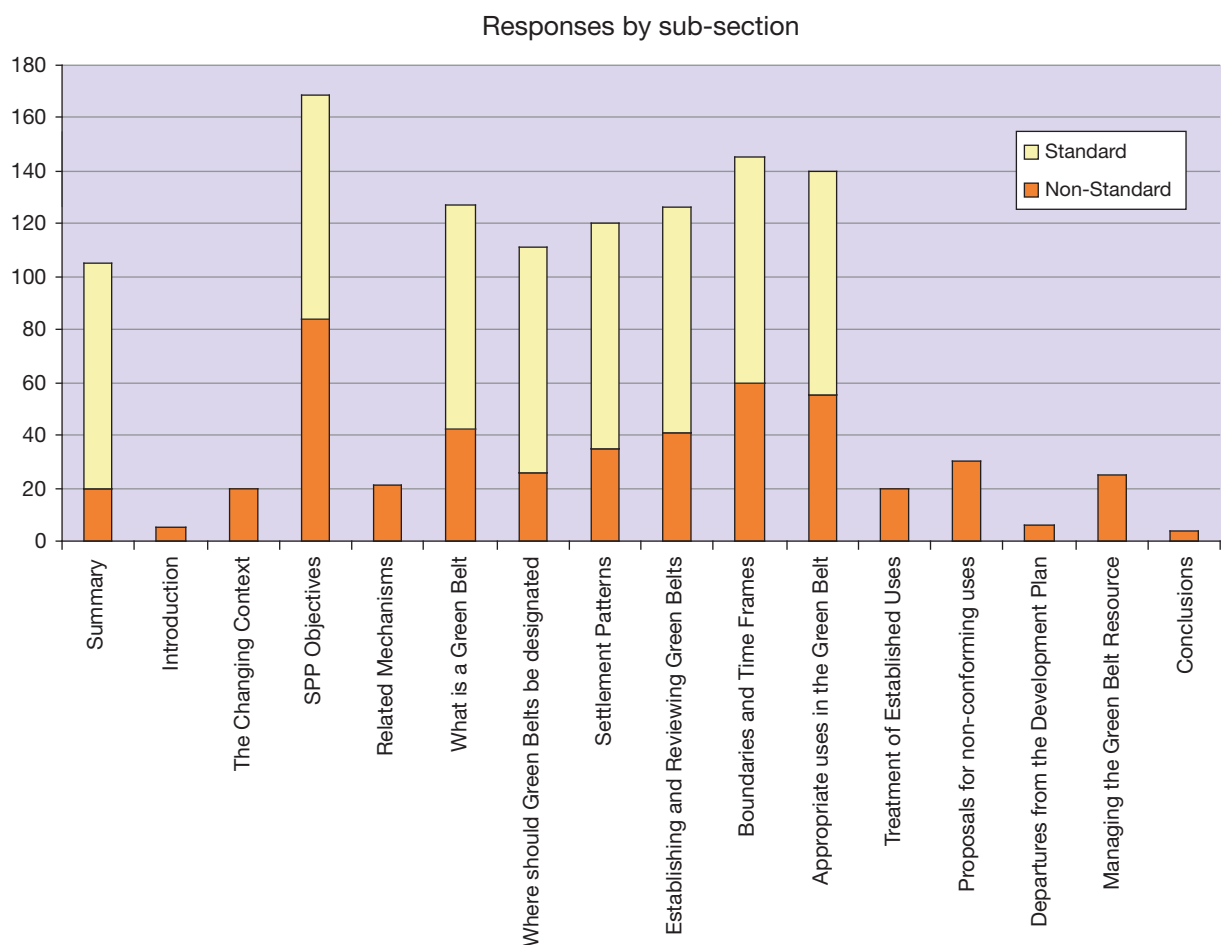
National & regional agencies

12. Responses have been submitted by a number of national and regional agencies with policy remits closely related to the issue of green belts like SportScotland and Scottish Natural Heritage, or to urban form like Architecture+Design Scotland. This category also includes two departments of the Scottish Executive who have responded internally to the consultation.

Other

13. One response, from the Brethren’s Gospel Trusts (a religious organisation), does not fit easily into the above categories.

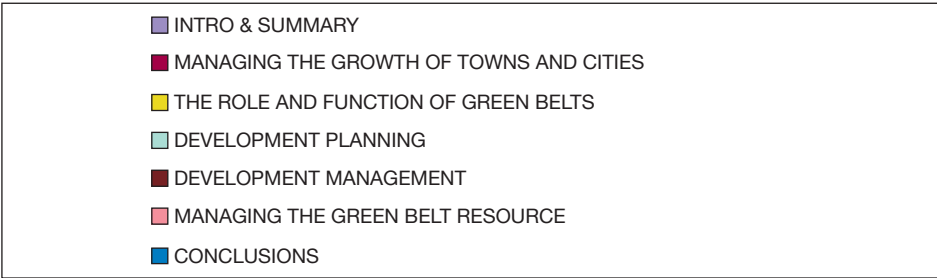
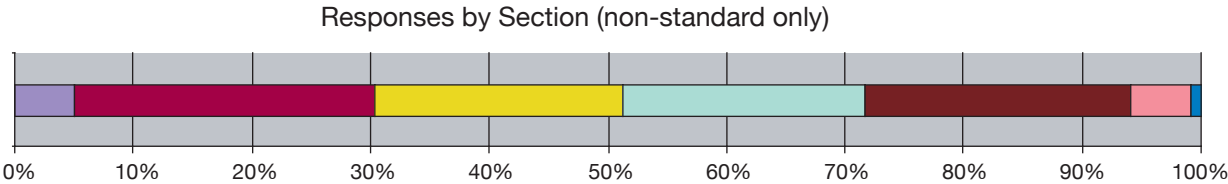
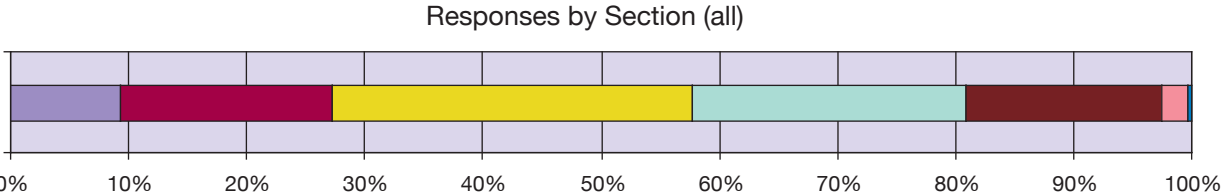
Spread of responses



14. The graph above counts the number of responses containing a comment relevant to each sub section of the draft SPP. Nearly all responses have something to say about the SPP objectives, but there is also a good deal of comment about boundaries, timeframes and uses in the green belt.

15. The graphs below, drawn from the above data, show how the responses relate to the various sections of the SPP. The first includes the standard responses and indicates that comments from individuals and community councils were more likely to concentrate on the role and function of green belts and development planning issues. The second omits the

standard responses and demonstrates that the other responses showed more interest in the earlier part of the draft SPP about managing the growth of towns and cities. A statistical breakdown of these by respondent type is provided below at the start of each section.



GENERAL COMMENTS BY RESPONDENTS

16. As already noted, publication of a new Scottish Planning Policy on green belts is warmly welcomed. Respondents overwhelmingly express support for the document, albeit with some big reservations in many cases. Only a handful of responses are wholly negative about the SPP.

17. There is general agreement across the responses that green belt policy needs to be restated and that the Executive is right to do this as part of the new Scottish Planning Policy series rather than a revision of the existing circular. Several responses affirm that Circular 24/1985 is outdated, needs revision, and that a new SPP is the best way forward. The Royal Town Planning Institute in Scotland sums up these sentiments: *“We welcome a long overdue update of this twenty year old policy and its transformation from the format of a circular to that of the SPP series”*.

18. A small number of respondents welcome the new SPP almost unconditionally, remarking on how it would make a useful contribution to planning policy, or encourage appropriate expansion of towns and cities. One respondent says only that: *“The content of draft document is very good and needs little alteration if any”*. Most responses, however, express their support for the draft SPP in more limited ways: *“We broadly support the proposals”*,

“The draft SPP21 is to be generally welcomed”, “We agree with the general thrust of the revised policy”, “In the main we are supportive of the draft SPP, but there are a number of issues” are typical responses. Similarly, the standard form responses supported key elements of the draft SPP whilst marking up disagreements and suggestions about particular elements of the policy.

19. Green belts themselves clearly continue to enjoy more consistent support. The responses suggest that green belts are an aspect of planning most clearly recognised by organisations and members of the public, even though much debate surrounds them. There is evidence here of a general consensus that green belts are a valuable and important planning tool, though some members of the public put them much higher than that. Stewart Milne Holdings in supporting the content of the draft, especially its recognition of the long term function of green belt designation, says the housebuilding industry would greatly benefit from strong guidance provided it is based on justifiable landscape and planning grounds, and which categorically defines where development can and cannot take place in the longer term.

20. Many respondents are pleased to see new emphasis on green belts and support the draft SPP’s aims to strengthen and enhance their role. A number of respondents question whether green belts are appropriate or relevant to their area, but only a tiny minority actually question the fundamental principle of green belts or express an entirely negative view about them.

21. The new concise style of SPPs is welcomed, but opinions differ on the adequacy of the document. Some consider it to be well written with clearly expressed policies. Others find it lacking in creative or innovative policy changes. Others find a lack of precision on important points of detail. Since many see green belts as conferring clarity and certainty, it is natural for several responses to highlight the need for policies to be clear, comprehensive, unequivocal and unambiguous. This is noted by many as important operationally, since green belt policies are going to be heavily relied on for guidance in the examination of development plans and the determination of planning applications. More explicit guidance, they suggest, would be helpful to planning authorities, developers and communities alike. In this respect one respondent sees the draft as too much of a discussion paper, and is looking for greater firmness in the published version.

22. Many respondents seek clarification on specific points in the draft, or express a deeper dissatisfaction with particular phrases or aspects of the policies as worded. These are highlighted later in this report. Some respondents also feel the SPP would benefit from an accompanying planning advice note or circular. Despite these remarks it is worth emphasising again that almost all of the responses are positive in tone. Most of the comments and criticisms are presented in a helpful and constructive way. Details of drafting suggestions accompany many of the responses, including the submission from the Scottish Green Belt Alliance.

COMMENTS ON EACH PART OF THE DRAFT POLICY

The summary

23. Almost all of the individual and community councils, and around half of the heritage & environment group respondents, support the strong presumption against development in the green belt – mentioned first in the summary section of the draft SPP. The vast majority of these responses also refer to the need to avoid urban sprawl which also appears in this section. One respondent notes that “urban sprawl is mentioned in the summary but not elsewhere in the document”. All the standard-form responses support both the strong presumption against new development in the green belt and the need to avoid urban sprawl.

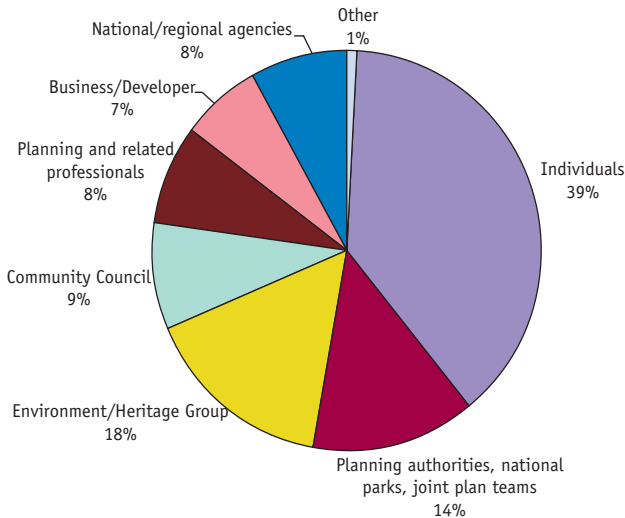
24. The responses make little direct criticism of the summary and support was offered to several other statements in the section. But a number of responses do request that the summary makes reference to the countryside, and one draws attention to mixed signals about growth in the first sentence.

The introduction – paragraph 1

25. Though small in number, some responses suggest there should be clearer cross referencing to other policy papers, with one individual arguing that it should not be assumed that everybody has an instant grasp of all Scottish Planning Policies and National Planning Policy Guidelines. Several respondents refer to SPP3 (Planning for Housing), NPPG11 (Sport, Physical Recreation & Open Space) and NPPG14 (Natural Heritage) are also mentioned, and others make individual references to PAN 65 (Planning & Open Space), PAN72 (Housing in the Countryside) and PAN 73 (Rural Diversification).

MANAGING THE GROWTH OF TOWNS AND CITIES

Managing the growth of towns and cities: spread of comments from respondent:



The changing context – paragraphs 2-4

26. Many of the comments submitted have some relevance to this section of the draft SPP and about 20 of them made comments that can be related to it directly. More than half of these come from environment and heritage groups or planning and related professionals, with the rest coming from across the other respondent categories.

27. The comments on the changing context generally focus on two points - the Scottish Ministers' priority to regenerate communities and re-use vacant urban land, and the recognition of different circumstances across Scotland. There is little disagreement that population and household patterns are changing or that that high quality environments and accessible locations are increasingly important.

28. Several of the responses support prioritising regeneration and the re-use of vacant urban land but, as one response notes, this is something that everyone can agree on. However, a number of the responses say the relation between green belts and urban regeneration is so fundamental that it deserves to be elaborated as a context to the SPP. A significant number of responses point out that urban regeneration is particularly pertinent in the west of Scotland.

29. There is some criticism that the draft SPP fails to properly recognise the different circumstances across the country, with one response seeing an SPP bias towards the east of Scotland. There are some suggestions that the differences between pressurised expansion areas (such as Edinburgh and Aberdeen) and less pressurised areas with availability of brownfield land (mostly in the west) could have been spelled out more clearly.

30. A number of respondents also think it would be useful to elaborate on why changes are being made to the existing green belt policy. Some think there could be greater discussion of policy changes since the 1985 circular (with a few even going back to the inception of green belts at the end of the second world war). In particular, a number of respondents want to see more context and explanation of why preventing coalescence is being dropped as a key green belt objective. Others seek a more rural dimension for green belt policy. These two points are expanded on in observations below on the key objectives.

31. There are also calls to more clearly spell out the links between green belt and the wider-policy context, particularly relating to issues like sustainable development, climate change, reducing the need to travel, integrated transport and green space.

SPP objectives – paragraphs 5-6

32. The responses to the consultation confirm there are many different opinions on what the objectives of green belts should be. 90% of the responses to the consultation (including all the standard-form responses) comment on the key objectives of green belts. In terms of numbers, more responses relate to this section than any other part of the document. Planning authorities, developers and planning professionals tend to be more welcoming to the objectives as stated, but support, criticism and points of discussion come from all quarters, as do proposals for extra objectives.

The vision

33. The vision expressed in paragraph 5 of the draft SPP has proved a good deal less controversial than the objectives that follow it. Many of the responses express their support for the vision. The aim to 'strengthen and enhance the role of green belts and encourage stability to increase their effectiveness' is widely supported and there is also general agreement that green belts can deliver 'major benefits to Scotland in improving quality of life for local people'. Only a couple of responses disagree with these points.

34. Nevertheless, a number of the responses highlight what they see as shortcomings in the opening paragraph. Some think that it should be clearer about the possible expansion of housing into existing green belt areas, whilst others want specific mention of the presumption against new development in the green belt. In a similar vein, some seek further references on the need to prevent urban sprawl and protect the countryside. These points are elaborated on in the observations below.

The objectives

35. Although there is plenty of support for the key objectives outlined in paragraph 6 only a handful of respondents (mainly from the planning profession and local authorities) seem content to let them remain in their current state. There is a common view that the list of objectives is too limited as it stands. Several of the respondents see the strengths of green belts in serving many objectives and want a more comprehensive list to be included. One respondent argues that the omission of objectives might be interpreted as a rejection of them. Some respondents also seek greater precision on the three objectives included in the draft.

Objective 1: To direct planned growth to the most appropriate locations and support regeneration

36. A number of the responses stress the link between the redevelopment of brownfield sites and the achievement of regeneration goals, and so recommend that the objective be reworded to refer specifically to either brownfield sites or development of vacant land. This view is conveyed in alternative wording from Currie Community Council "*to encourage regeneration and development on brownfield sites within built up areas*".

37. Three of the responses argue that it is misleading for the objective to imply that green belts could positively direct development. They take the view that the benefits actually come about in a more indirect way as development is diverted away from the green belt. One respondent argues that this objective should be placed further down the list below 2 and 3.

Objective 2: To protect and enhance character, landscape setting and identity of towns and cities

38. This objective is very widely supported and only a few comments are directed specifically at its wording. Nevertheless, this objective is closely linked to issues of coalescence and protection of the countryside, on which there are numerous comments. Among the limited number of suggestions for wording it was proposed that references to countryside protection and separate identity should be added. One respondent suggests that this objective sets out the primary purpose of green belt and it should therefore be at the top of the list.

Objective 3: To protect and give access to open space within and around cities, as part of the wider structure of green space

39. It is clear that many people regard the green belt as a valuable asset in terms of access to open space. Responses describe green belts as “*green lungs*”; one sees green space as beyond price: a legacy for future generations that is “*irreplaceable*”.

40. Though relatively few comments are directed at the wording of the objective, a number of respondents are unclear about the meaning of “wider structure of green space”. SportScotland also feels that the phrase “access to open space” does not adequately cover the range of recreational uses acceptable in the green belt, and recommends that the objective specifically refer to recreational experiences. Others suggest that specific reference should be made to amenity and tourism.

41. A number of developers believe that the protection of open space should not be an overriding factor in the allocation of green belt land and argue that other planning mechanisms are better than the green belt in achieving aims for open space and access. A few argue that green belts should not be extended to land within towns.

Urban sprawl, coalescence & identity

42. This, for many, is the draft SPP’s inexplicably missing objective. The avoidance of urban sprawl and the need to prevent coalescence are regarded as key green belt objectives by many respondents. There is a common view that the prevention of coalescence is fundamental in protecting the identity of settlements. The absence of any reference to coalescence is therefore one of the most controversial aspects of the draft SPP. Prevention of coalescence has been a central pillar of green belt policy since its inception (a fact remarked on by several of the respondents), and for this reason it is perhaps unsurprising that its absence from the draft SPP has been picked up by so many people.

43. The issues of urban sprawl and coalescence are raised in the standard-form responses. These state that... “*Communities are important. Urban sprawl should not be allowed to ‘swallow up’ settlements. Green Belts should be used to stop that kind of coalescence.*” Individuals and community councils make up the majority of those who express concern about urban sprawl, coalescence, and in some cases ribbon development, but strong views are expressed across the various respondent groups with the issue raised by developers, planning authorities and environmental bodies alike. “*SPP21 lacks provisions for preventing coalescence of settlements*”, “*the prevention of urban sprawl and coalescence remains a legitimate aim of Green Belt designation*”, “*the distinct identities of towns and villages are highly valued*” are typical responses. As noted already, one respondent draws attention to the fact that though the need to avoid urban sprawl is mentioned in the summary section, there is no reference to it in the body of the document.

44. A small number of developers and planning professionals support the removal of ‘coalescence of settlements’ as a reason for green belt designation, highlighting that sustainable patterns of development, for example along transport corridors, can justify coalescence in some cases.

Protection of the countryside

45. The standard-form responses state that... “*Green belts are important for countryside reasons, not just for urban reasons. That should be stated in SPP21 and para 6 on objectives should be extended.*” This view is also expressed in some of the non-standard responses, mostly among the heritage and environment groups that support the stance of the Scottish Green Belts Alliance.

46. Several respondents think that the SPP could do more to view green belts from a rural perspective, and that this would better reflect the relationship of towns and cities to their surrounding areas. A few of the respondents also view the green belt as an important agricultural asset which allows fresh produce to be generated close to areas of demand. Some respondents think that the draft SPP has an urban bias and one suggests it has been *“prepared by urban planners viewing the green belt as development land”*.

47. The main thrust of most of these responses is that protecting the countryside from inappropriate development is a key aim of the green belt and that there should be a statement to this effect in the SPP.

Other objectives

48. As already stated, many respondents want the SPP to contain a more comprehensive list of objectives. Objectives relating to urban sprawl, coalescence and countryside protection are by far the most common ones suggested, but others are highlighted too. The protection of cultural heritage is mentioned by a significant number of respondents, and a similar number also refer to the protection of natural heritage, wildlife and bio-diversity. A smaller number refer to the management of urban fringe areas. Architecture and Design Scotland for example argues for a co-ordinated response to a number of related issues. It wants to see opportunities taken to improve design quality in all edge of settlement developments bordering green belts as well as in associated development in rural areas. The tourism value of the green belt is also mentioned.

Related mechanisms – *paragraph 7*

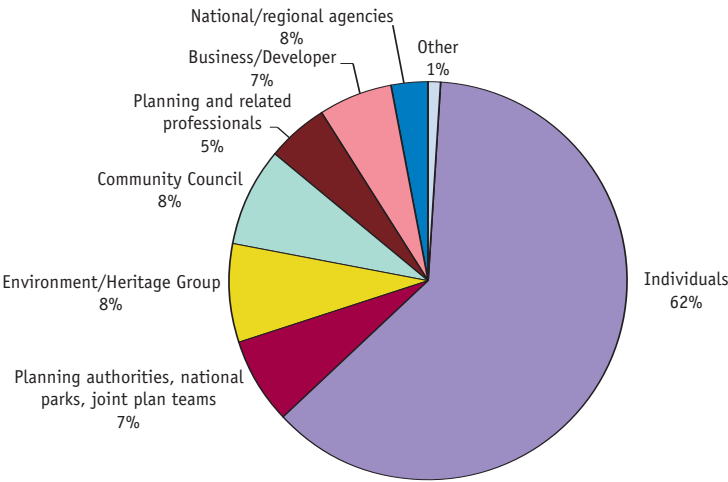
49. Several of the responses welcome the recognition that green belts are only one of a range of mechanisms that help shape our towns and cities. There is a general view that green belts need to be complemented by other policies and some local authorities note how green belt aims have been delivered in their area by the use of other policy tools.

50. However, there is a view from some respondents that green belts are a relatively straightforward and effective tool, particularly in protecting an area from inappropriate development, and that some of the alternatives might not always be able to achieve the same results.

51. A number of respondents stress the importance of clear cross referencing to other policy papers (a point already made in relation to the introduction and changing context paragraphs), and some identify related mechanisms to add to those in the draft SPP. Countryside management and rural development policies top this list, but there are also references to the conservation of the historic environment, and on a more strategic level to the National Planning Framework. One view, noting that the engine of pressure on green belts is household formation, asks whether there might be merit in offering tax and council tax incentives to inhabit dwellings more intensively and discourage under-occupancy.

THE ROLE AND FUNCTION OF GREEN BELTS

The role & function of green belts: spread of comments from respondents



What is a green belt? – paragraphs 8-11

Definition

52. The draft SPP defines green belt as: *“an area of land designated for the purposes of managing the shape of a town or city in the long term”* and continues: *“It is the outcome of a long-term settlement strategy to achieve the three objectives listed in paragraph 6.”*

53. Many responses welcome the reference to the long term function of the green belt but there is a common view, particularly amongst planning authorities and planning professionals, but also from developers and environment and heritage groups, that the definition of green belts given in the draft SPP is lacking. The responses include remarks like: *“it is a very partial statement”*, *“paragraph 8 fails to adequately define green belts”*, *“The definition is insufficient because it does not define green belt”*, *“The present description of Green Belt appears to be more a statement of purpose rather than a definition.”* Several of the responses say they find the definition of green belt confusing.

54. A significant number think the definition should be amended. One of the housebuilders suggests that *“the purpose of green belt should be to protect land around settlements to define a limit to the urban area”*, and this sentiment finds echoes across all the respondent groups. Clearly the green belt is still widely regarded as a tool of control and restraint and several suggest that to deny or omit the acceptance of this here is more than a little misleading. The responses include some alternative definitions, most of them emphasising the protective role of the green belt, but the most common suggestion is that some reference to the strong presumption against development should be included. The responses also highlight that restrictive policies are not necessarily negative and can lead to positive outcomes in promoting regeneration and in helping to define and manage urban-rural boundaries.

55. There is almost total agreement that green belts are not the best way to protect natural heritage or safeguard land for major uses, and nearly all of the responses that express a view on this accept that other designations are more suited to these tasks. There is also a consensus that only areas of land that deliver on green belt objectives should be designated as green belt (although, as indicated already, there is plenty of debate as to what these objectives should be).

The form of the green belt

56. Over a third of those answering the question 'what is a green belt?' refer to form and shape. There is broad agreement, especially among planning authorities, that green belts should take a variety of forms and reflect local circumstances. Some advocate one form over another whether green wedges, green fingers, or buffers. South Ayrshire and Edinburgh Councils both highlight the benefits of having distinct and unconnected green belt areas (in the case of Edinburgh the Water of Leith corridor, Holyrood Park and Corstorphine Hill), and East Ayrshire Council goes further, saying green belts should only encircle communities in very exceptional circumstances. On the other hand, one respondent suggests that isolated areas of green belt are not appropriate and that green belts should only apply to land which is directly linked and forms part of the undeveloped countryside.

57. There are different views on whether 'green belt' is the right term if the policy areas can take a variety of forms, especially as the word 'belt' suggests a continuous surrounding band of land. 'Green network' or 'green zones' are alternatives suggested by the Scottish Civic Trust, but other respondents note that there should be a clear distinction between green belts and green field land, and that the term green belt is already well recognised by the public.

58. Two developers welcome the statement that green belt policy 'should be used to direct development to suitable locations, not to prevent development from happening', one noting that the policy should be flexible enough to ensure that appropriate development can take place if there are positive benefits. But some respondents from the other groups think the sentence is ambiguous, potentially undermining the clear presumption against development, and open to exploitation by the development industry. Renfrewshire Council puts forward the alternative "*Green belt policy should be used not to prevent development as an end in itself, but to direct development to suitable locations*". In the view of one property company, more suitable and sustainable locations could include the urban fringe or along transport corridors, in order to reduce congestion and the need to travel long distances.

Quality of life

59. As noted already, most respondents support the idea that green belts should enhance the quality of life for local people, and few query the four bullet points in paragraph 10. The reference to outdoor recreation is welcomed and the standard responses acknowledge that green belts are important for health and recreation although they stressed that *nearby* access for people is also important. It is worth noting that some individual respondents draw particular attention to health benefits.

60. SportScotland is concerned to clarify what exactly access is for (does it cover all recreation or extend to education) and suggests that the bullets should also mention access to urban green spaces. Scottish Natural Heritage strongly agrees with the emphasis on effective management, but seeks to clarify the term access to the countryside and question whether it is different from outdoor recreation. SNH also proposes a reference to walking and cycling and like SportScotland refers to the value of green belts for environmental education. Clydebelt requests that green tourism is mentioned specifically.

61. The Association of Scottish Community Councils has a point to make about quality of life. It says that pursuing the regeneration objective of green belt policy has led to many examples of local authorities themselves using green belt and green space land for business or industrial parks, where they provide or allow soulless, drab concrete and steel structures, and then take more land for housing on sustainability grounds to reduce the need for travel. Many such business estates are now more or less empty, says ASCC, and effectively discriminate against the aspiration to enhance the quality of life for local people.

Where should green belts be designated? – paragraph 12

62. *“We think that the creation of new green belts should be encouraged”* say the standard responses, but over half of the non-standard responses also address this issue with opinions neatly divided according to respondent type. Businesses and developers and planning professionals support the statements in the draft SPP; planning authorities and national agencies are slightly more tentative; and environment and heritage groups, community councils and individuals take issue with several points.

63. There is unanimous agreement amongst businesses and developers that most settlements don't need green belts. They have no enthusiasm for new green belts and several in this category agree that other policies can be used to achieve green belt aims and protect the character and identity of settlements. For example, Homes for Scotland submits: *“we have consistently urged planning authorities to use other policies to protect the settings of our towns and cities and in particular it is our view that planning authorities should seek to accommodate growth by seeking to release significant areas of land on the edge of settlements and to use master planning and development briefs to ensure not only high environmental quality but also to promote the place-making agenda”*. Some argue that all existing green belts should be reviewed in light of the new SPP so that unsuitable ones can be rezoned. The Brethren's Gospel Trusts views are similar to those submitted by businesses.

64. There is also near-unanimity among planning and related professionals that most settlements don't need green belts. This connects with a view that the development pressures that would make green belts necessary are simply not present in many areas, and in most cases other policies can achieve the green belt aims just as successfully. One respondent notes that green belts can sometimes be used to pursue an anti-development agenda rather than to direct development in the wider public interest.

65. Planning authorities offer more cautious support for the SPP. There is recognition that other policy devices can protect the countryside from inappropriate or unplanned development and safeguard landscape setting and character, and both Dundee and Angus Councils (where a green belt was removed) note that green belts will not fit every circumstance. But Aberdeenshire Council suggests more use should be made of green belt policy which is familiar and easily understood by the public, for the protection of open space, particularly within towns. They add that while other policies can do similar things, it is clearer to use green belt policy than a plethora of other local policy initiatives. Scottish Natural Heritage also notes that other policies lack the strength and public recognition of green belts. Clarity is sought on the conditions under which a new green belt might be created. The need for close liaison between authorities is also remarked on.

66. For the most part, community councils, environment and heritage groups and individuals strongly dispute the draft SPP statement that most settlements do not need green belts. The Scottish Civic Trust, supporting the draft in other respects and accepting that the statement may indeed often be true, makes the point that if paragraph 12 promotes the usefulness of green belts in towns and cities with a distinct character and setting, then specific green belt

policies (as opposed to vaguer countryside ones) could be used equally to protect the identity of vulnerable smaller settlements. The Association of Scottish Community Councils adds that “*building pressure already exists on green areas surrounding even our smallest towns, while large tracts of land and buildings lie empty in their midst*”.

67. Many responses want the SPP to encourage new green belts or adopt a more neutral stance; a view that accounts for almost half the non standard responses. There is also feeling that each case should be seen on its own merits and that it should be for local people, not for Ministers, to decide where a green belt should be designated. A number of groups cite benefits that green belts would have for their areas. The value of other policies is recognised but with the view taken that they do not necessarily deliver the same results. Many respondents who share this perspective think the statement that ‘Ministers do not expect to see many new green belts designated’ should be dropped.

Settlement patterns – paragraph 13

68. Responses on this section of the draft document divide loosely by respondent group. Businesses and developers and planning professionals tend to be more supportive of the statements in paragraph 13, while environment and heritage groups, community councils, individuals, and to a lesser extent planning authorities, are more likely to express concern.

69. Businesses and developers welcome the recognition that development can occur along transport corridors and on the urban fringe. Several highlight sustainability benefits of such a settlement pattern, and some see clear benefits too in cooling overheated property markets by increasing the supply of accessible housing land. Planning and related professionals also welcome paragraph 13 and raise the issue of sustainability, supporting greater emphasis on reducing the need to travel in looking at the influence of the green belt on commuting patterns.

Urban fringe, ribbon development and urban sprawl

70. The City of Edinburgh Council sees the range of settlement options presented in the SPP as a radical departure from previous green belt guidance. For many, especially environment and heritage groups, this change of direction is unwelcome. There is a widely-held perception that encouraging development on the urban fringe and along transport corridors will bring back the ribbon development and urban sprawl that many think green belts should be trying to prevent. Some point to a direct contradiction with the commitment to avoid urban sprawl in the summary of the draft SPP, others see this paragraph as a potential get-out clause for development in the green belt. The standard responses object to paragraph 13 in these terms: “*town fringe incursion into Green Belts and ribbon developments are aspects of urban sprawl (see summary). I object to para 13 which could encourage them.*” Previous comments on dangers of coalescence as an objective in paragraph 6 are also relevant here.

71. Some of the respondents argue that paragraph 13 fails to fully explore all the sustainability issues surrounding green belts. Midlothian Council sees this part of the draft SPP as too generalised and seeks more direction on the sustainability issue.

Leapfrogging

72. There is a fairly widely-held view that development that leapfrogs the green belt is undesirable and likely to increase car-borne commuting. Examples are given by respondents. The British Holiday & Home Parks Association Ltd claims the Aberdeen green belt caused development to jump to areas beyond. Strathblane Community Council sees

development in Balfron as a generator of commuter traffic to Stirling, and an individual respondent cites the examples of Joppa, Hillhead and Coylton outside Ayr.

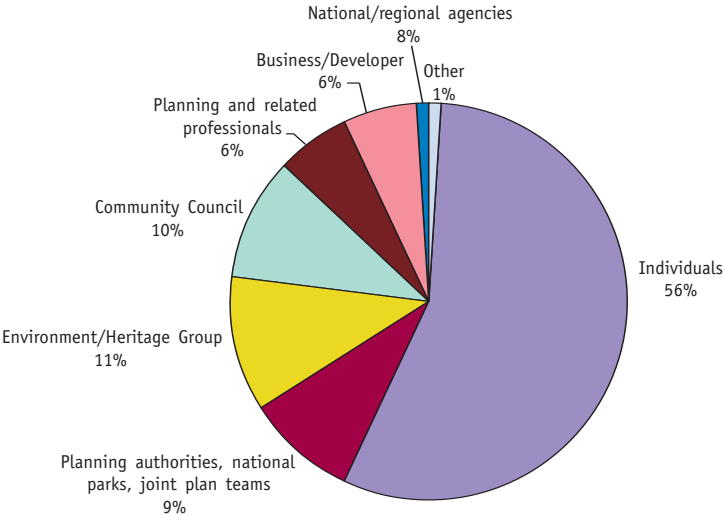
73. On the other hand some see this leapfrogging argument as slightly one-sided, arguing that improved public transport links also help to deliver sustainability goals, and in some instances development in outlying settlements may be more sustainable than development on the urban fringe, which could also lead to increased car use.

Other issues

74. The standard responses state that *“if Green Belt incursion is really needed, it should include consideration of expanding villages in order to save primary schools, village shops, post offices etc. (If village residents want that) or by other methods set away from the fringes of the towns.”* A small number of non-standard responses echo these sentiments and advocate more emphasis on techniques that avoid town fringe development and urban sprawl like voluntary village expansion, green halos, and tandem suburbs, described in detail by the Helensburgh Green Belt Group. References are also made to the benefits of developing brownfield land within urban areas. Architecture and Design Scotland highlights the importance of high quality design around the urban fringe.

DEVELOPMENT PLANNING

Development planning: spread of comments from responden



Establishing and reviewing green belts – paragraph 14-15

75. There is general acceptance that green belts should be established and reviewed through the development planning process, but some uncertainty about precisely how this would be done. Business is concerned that green belt designation should only follow after enough land to accommodate future growth has been identified in settlement strategies. Individuals and communities are concerned that their voices should be heard, and one or two are adamant that *“once designated, green belts should be inviolate, and not a moveable feast controlled by politicians”* since *“once destroyed, they are lost for ever”*.

76. Green belts often involve more than one authority, and one professional adviser makes the comment that the necessary coordination and consistency between them does not always happen. In the submission of Architecture and Design Scotland, green belt policy

should act to avoid land becoming blighted, and be seen as a means to secure quality from developers and the responsible maintenance of land over which they hold options.

77. The broad support across the respondent groups that green belts should form part of a long term development strategy and be reviewed through the development plan process was qualified. Several respondents, especially amongst community councils and environment and heritage groups, suggest that because green belts should be a long term designation they should not be subject to change with every review of the development plan. Glasgow University puts it this way: *“the constant review of boundaries at each local plan review serves nobody well and undermines the... ability to engage in longer term planning.”*

Advice for review

78. As one respondent notes, the choice of factors to be taken into account in the review of green belts is key, and several environmental groups voice their support for the use of Strategic Environmental Assessment in this context. There are many suggestions that the review should be rigorous, different views on the key considerations (natural heritage designations or availability of brownfield sites), and a fairly widespread wish for more guidance on this point. Some think a statement in the SPP will be enough while others think clarity and rigour requires separate additional guidance. A number of the responses stress that economic and social, as well as environmental, considerations must form part of any review. Some are eager to know when the review of existing green belts can begin.

79. It is apparent that many see green belt review and the identification of boundaries as perhaps the most difficult processes, and these issues in responses are therefore analysed here in some detail. There is a concern that any review of the green belt could be dominated by developers locking horns with each other, the local authority or local communities. Linked to these concerns is the view that the local communities must be fully involved (involved rather than simply consulted) at all stages of the review process.

80. The St Andrews Green Belt Forum looks for some recognition that the designation and maintenance of green belts is more than just a tool for planners: *“The overall impression ... is that the support offered by local communities for their green belts is totally irrelevant: all that counts is whether a planning authority or professional planner find it useful in delivering their objectives.”* The draft would give more comfort to communities, they add, if it adequately acknowledged the need to take their views into full account in determining any green belt policy changes.

81. Perhaps the above concerns also provide some context to the recommendation in the standard responses that a...“strong presumption against new development in the green belt should apply when development plans are being drawn up.”

Ministerial approval

82. There is broad agreement that proposals for new green belts ought to require specific approval from Scottish Ministers, a view that any review that eliminated or significantly reduced a green belt should also need this approval, and some uncertainty whether this would be the case. In the view of the Royal Town Planning Institute in Scotland, the policy should be specific and positive in requiring each of the new strategic development plans for the four city regions to consider the need for green belts, and should further clarify the process by which Ministerial approval will be given for new green belts, or be required for the removal of existing ones.

Boundaries and timeframes – paragraphs 16-19

Long term certainty

83. For the most part, there is a warm welcome for a twenty year perspective. The standard forms of response refer to *“at least 20 year protection, not 5 years as at present.”* Aberdeenshire Council cites the 25 years mentioned in the Review of the Planning System, warns against inflexibility, and suggests making a more explicit connection with development planning timescales. The Scottish Planning Consultants’ Forum believes that green belt objectives should be adapted to current circumstances and their time horizons synchronised with development plans, and that the draft should encourage greater flexibility and scope for local discretion. Balerno Community Council has some concerns over 20 years, believing that it may become necessary either to designate new green belt areas to restrain increasing rural attack by developers, or to reconsider green belt to facilitate need, and up to 10 years might be realistic. Strathblane Community Council on the other hand thinks long-term green belts are too important for review in shorter-life development plans: they should be under the control of the Scottish Ministers and reviewed at no less than 30 year intervals.

84. Premier Property Group thinks it correct to establish a 20 year time frame as this will mesh with the Strategic Development Plan and long term housing and business land reviews. Looking at what this approach may require, one business respondent remarks: *“for green belts to be credible they should identify areas where, for the long term, urban expansion will not be permitted for sound reasons to protect the setting of towns or to avoid coalescence of settlements... It is possible that a two tier Green Belt policy regime should be operated, the lower tier recognising the inevitability of development on the urban fringe.”* The two-tier idea is also commended by the Scottish Planning Consultants’ Forum, which notes that it was a recommendation in the ‘Review of Green Belt Policy in Scotland’ by Heriot Watt University.

85. There is a firm view in the development industry that strict time criteria should be used in green belt definition. The housebuilders’ organisation Homes for Scotland, along with other responses from this sector, asks for the SPP to include *“a sentence which explicitly states that land likely to have development potential within a 20 year time frame should not be zoned as greenbelt land”*. This group of respondents strongly supports the draft SPP proviso that inner boundaries should not be drawn too tightly.

86. The Scottish Green Belts Alliance wants that same sentence removed as it is likely to be seen as *“a green light for urban sprawl”*. Some community and group respondents see tight boundaries as inescapable in their own areas, or necessary for the revival or regeneration of some towns. Helensburgh Community Council notes that *“the more a green belt boundary is pushed out the less accessible it becomes for most people”*. There are a lot of comments about fairness, meeting a set of standard criteria, and taking great care to get things right in the initial exercise, particularly as many believe that the twenty year timescale will not be subject to any sort of interim review. In the words of one group *“the start of each 20 year span will be a sensitive time”*.

Lines on the ground

87. Commenting on paragraph 17, Premier Property Group agrees that hedges and field enclosures can provide defensible boundaries, but adds that where there are no distinguishable features to demarcate optimal settlement limit, new tree belts can achieve the desired boundary. One community council response disagrees that physical features like roads, railways or rivers should be used if the green belt is to be about preserving character of an area, and that only “tree belts” and “landscape features that form the horizon”, such as

the ridge of a line of hills, are likely to be suitable. But, in contrast, others suggest that boundaries could include non-visible features such as pipeline or HSE exclusion zones.

Minding the gap

88. The Royal Town Planning Institute points out that the draft SPP needs to explain more clearly what should happen to non-designated land in the event that inner boundaries are not “drawn too tightly”, adding that *“This suggests some form of white land designation which the Scottish planning system has assiduously avoided in the past.”*

89. The same point is taken up by the Glasgow & Clyde Valley Structure Plan Joint Committee, which sees this as key to the way green belt can be used to manage urban development. The Committee wonders how long-term development areas, say in the second half of a twenty-year period, can be phased in to meet the demands of a sustained growth scenario. Failure to programme and phase-in long-term development carries major risks, it says. First, the momentum on regeneration and the delivery of brownfield flagship initiatives will be undermined if developers are tempted away to cherry-pick easy sites in the long-term growth areas. Second, infrastructure provision may become short-term and piecemeal as developers refuse to wait for long-term master-planning and all the infrastructure needed to support expanded communities or the creation of new ones. Third, landowners drop their commitment to maintaining the quality of their land once it is identified for development and loses green belt policy cover. Fourth, the drive to improve environmental quality and residential attractiveness is undermined.

90. The Committee also cites the uncertainty of forecasting and setting specific development requirements in the long term. Where previously an authority was able to maintain green belt designation until the need for release was triggered, the draft SPP removes that approach, suggesting nothing as a replacement, whilst still acknowledging the need for control and 'phased' development. There is a need, says the Committee, to specify clearly in SPP 21 and across the SPP series, that the development plan process will structure and manage the development of land released from green belt, and that Ministers will support authorities in achieving this.

91. This need for the SPP to stress that development plans have a key role in phasing land for release from green belt is also pressed by Ayrshire's equivalent Joint Committee. West Dunbartonshire Council takes a similar view, with reservations about safeguarding land in the short to medium term without the cover of green belt policy, it feels the SPP must spell out the principle under which land is safeguarded for structured release.

92. The City of Edinburgh Council also questions the practical implications of this section, pointing out that SPP3 requires structure plans to identify overall housing land requirements for 12 years and provide a "broad indication" of the scale and location of housing beyond year 12, preferably up to year 20. The Council feels it *“unclear how the green belt inner boundary, which must be clearly identified on the map and on the ground, can be drawn in such a way as to permit the broad indication to operate. It may be that certain areas of land are kept out of the green belt but safeguarded for longer-term development. Their release would be triggered by housing land monitoring and development plan reviews. Such land will come under intense development pressure and plans will need to be very clear on the timing of any land release so as not to undermine the development strategy.”* The Council believes that policy should be clearly set out on this key issue to ensure that the position is fully understood by all parties at appeals and inquiries.

93. The Elphinstone Group also seeks clarity, arguing that areas of green belt should be taken out of designation even if they are not required immediately, because this is essential for the development industry to ensure development takes place in time.

Green belt release

94. Inveresk Village Society argues that land should be taken out of green belt for urban growth only where: (a) there are insufficient other locations served by good public transport for housing and other needs to be met, (b) the key objectives of green belt in the specific location are not undermined, and (c) new long term, easily identifiable and defensible green belt boundaries can be created nearby. Their message here is (a) look to the green belt only as a last resort and (b) give solid weight to its specific local functions rather than its role simply as a buffer zone, and (c) green belt release should not start a process of urban creep; instead the loss should be accompanied and offset by stronger protection in the locality. This, the response argues, is better than replacing the green belt somewhere else where the designation might have less meaning, since for greenbelt, location not quantity is paramount.

95. In similar vein, a developer insists that expanding the green belt in one place to make up for release in another should always be fully justified through the development plan process. Others in the business community are more dismissive of the whole idea: *"The green belt should not be seen as being of a set area to be topped up if a piece is lost."*

Master planning

96. The discussion of master planning in paragraph 19 is noted by one professional response as not unique to green belt releases, possibly even more vital on major brownfield sites and thus, though welcome, is perhaps misplaced and might be better addressed through a Planning Advice Note. Another warns that achieving master plan agreement from all the parties listed could slow down not speed up the system.

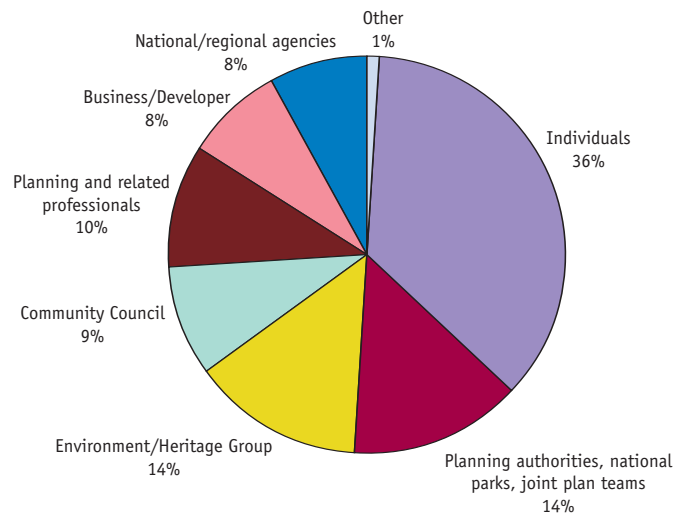
Local involvement

97. The reference in paragraph 19 to engaging with local people draws a number of comments. The Helensburgh Green Belt Group points out that the recent White paper contains a major section on the importance of public inclusion, yet the draft SPP inadequately incorporates this factor. This response argues that local communities and voluntary groups should be given active encouragement, and sees the draft statements in 19 and 30 as insufficient. It asks for the word "engaged" to be replaced with "involved", defining involvement as *"early, proactive and interactive engagement between two or more parties to develop proposals jointly"*.

98. The Scottish Planning Consultants' Forum is wary of community involvement being a big factor in the designation of green belts, because it can be used as a powerful weapon for local residents who wish to prevent the peripheral development of settlements even when this is strategically desirable in long term.

DEVELOPMENT MANAGEMENT

Development management: spread of comments from respondents



99. This part of the draft SPP deals with the issues that arise in considering planning applications. The Royal Institution of Chartered Surveyors in Scotland asks specifically whether the Scottish Executive intends to remove permitted development rights in green belts.

Appropriate uses in green belts – paragraphs 20-22

100. In this section the key issue is clarity, with particular respondents looking for explanation where terms seem unclear. The fear is that without greater clarity, authorities will make inconsistent interpretations. And the danger is voiced that – whatever the uses – green belts are likely to become places of car parks, transmission lines and telecom masts.

Strong presumption against new development

101. This is a point of widespread agreement. Commonly voiced across the respondent groups is the phrase “*we support the strong presumption against development*”. It appears most often in the responses from individuals, community councils and environment & heritage groups, and is found in the standard responses. For many, the presumption against development represents the cornerstone of green belt policy, and there is little criticism of its inclusion in the draft. But the firm reminder is given, mostly by developer and planning professional groups, that green belts should not be used as a blanket policy to resist development.

Local involvement

102. Several respondents mention the need to refer to local involvement at the planning application as well as the development plan stage. There is a feeling among members of the public and community groups that public involvement needs to be given more of a role to avoid poor development management decisions and prevent the piecemeal erosion of the green belt by developers which they see prevailing currently. One heritage group argues that “as a fieldmouse might nibble away at a turnip or beetroot so have developers with an all too acquiescent council.”

Suitable for green belts

103. Fife Council agrees that the development plan is the right place to spell out appropriate green belt uses. Preferring this to a criteria-based approach, it thinks a list of developments would allow planning authorities to be clear and direct, and give less room for subjective interpretation and manoeuvre. But Elphinstone Group takes the opposite view, seeing lists as inflexible and incapable of dealing with the kind of innovative developments that may be appropriate in the green belt; and they advocate the use of criteria instead. Both views are mirrored in a few other responses, but there is otherwise little discussion on this point.

104. A number of responses do pick up, however, on the different uses bulleted in paragraph 20. Recreation is the main focus here. SportScotland wants greater clarification on the types of recreational uses that are appropriate in the green belt, and in particular why equestrian uses are considered suitable uses. The Scottish Equestrian Association asks the Executive to give clear unequivocal advice on the positive benefits equestrian uses can bring to green belt enhancement.

105. SportScotland objects to the exclusion of motorised activities in SPP. It argues that, although these can sometimes be intrusive, the countryside should not be exclusively for quiet enjoyment and it is often the urban fringe where provision is most needed. It also suggests there may be areas of degraded or derelict land where motorised recreation would be a positive use.

106. The Ramblers' Association questions whether golf courses should be considered appropriate development, seeing them as "a highly unnatural type of development which needs to be sensitively designed if they are not to impede access and remove large parts of the green belt from public use." It notes that most golf course users travel by car which means building car parks. Another response thinks recreational uses are fine in the green belt but argues for limits on new buildings, referring specifically to those associated with golf courses. Another sees artificial surfaces as no compensation for loss of green space.

107. Previous circulars had identified institutions as appropriate green belt uses. Renfrewshire Council welcomes their omission from the draft SPP, but a couple of responses want the reference reinstated. There is also a suggestion that burial grounds be included as an appropriate use.

Scale, form and intensity

108. References to scale, form and intensity of use are welcomed across respondent groups. There is a general recognition that not all development in the green belt is necessarily damaging, and responses describe how small scale development can improve green belt quality, mainly in terms of landscape but also for bio-diversity. Respondents make the point that some uses, and a certain amount of human settlement, can help to support the attractiveness of green belts, which need hedges, ditches, and investment in time and money if they are not to degenerate into scrub. The statements about re-use of historic buildings are also remarked on positively, as are those on the promoting public transport, walking and cycling. A number of planning professionals emphasise that single houses, or small clusters of housing can be appropriate in certain circumstances, and the Farningham McCreadie Partnership feels that the redevelopment of brown field sites needs to be recognised. SportScotland asks for clearer explanation of the terms "compatibility with an agricultural or natural setting" and "low intensity".

109. Architecture and Design Scotland welcomes the draft SPP's reference to high quality design, seeing development in green belts and development up to green belts at the urban edge as two sides of the same coin. It stresses that urban edge development also needs to

give attention to design, architecture and landscape, particularly in terms of prominent views into settlements. It puts forward a series of criteria that can be applied to urban edge developments.

Rural development and diversification

110. Paragraph 22 makes several respondents uneasy. They think the role of SPP15 should have been more clearly defined, or that the relationship between paragraphs 20 and 22 needs clarification. There's a view among planning authorities that unless the relative role of SPP15 is more clearly set out, green belt policy will be weakened by inappropriate development under the guise of rural diversification. Some ask for the kinds of rural diversification that would be right for the green belt to be spelled out. The Scottish Rural Property and Business Association finds the references to the re-use of agricultural buildings too restrictive and recommends that "appropriate uses" be extended to cover all development under the Farm Business Diversification Scheme (FBDS), including the conversion of farm buildings for residential letting.

Infrastructure

111. The Royal Town Planning Institute notes that the draft makes no reference to developments outside the statutory planning system like motorways, major wind farms, transmission lines, and pipelines. This issue is picked up by Aberdeen City Council and an Aberdeen based consultant who both draw attention to the fact that the draft SPP does not address the issue of infrastructure projects that require a green belt location, citing the example of the Aberdeen Western Peripheral Route. It is argued that infrastructure developments such as these should be delivered through the planning system and regarded as appropriate green belts uses, and that branding them as non-conforming uses is unhelpful.

112 Scottish Water makes special reference to this part of the draft, noting that the list of appropriate uses omits water and wastewater facilities, many of which occur in the green belt. This, it says, can present challenges when it seeks to upgrade or establish new facilities. It argues that categorising these developments as contrary to green belt policy risks delay and additional costs and sends a confused message to society that Scottish Water's activities appear not to be in the public interest. It concludes it would be better to exclude Scottish Water facilities from green belt than treat them as an established use.

Treatment of established uses – *paragraph 23*

113. The proposal that existing settlements should be excluded from green belt designations is welcomed, with nobody suggesting the opposite. Excluding certain major land uses is also welcomed for the most part, but there are those who disagree or think further clarification is needed, with the term major use clarified, and perhaps even what constitutes a settlement elaborated on. There is some doubt about whether institutions are established uses. It is noted that paragraph 23 refers to major educational and research uses, for example, but that the term institutions does not appear till paragraph 25.

114. Some respondents would like to see a reference to the re-use of brownfield land in paragraph 23, one argument being that taking major derelict brownfield sites out of the greenbelt will encourage their reuse and redevelopment. A flexible approach to existing settlements is advocated by one business respondent, who sees small but useful brownfield opportunities offered by redundant agri-industrial premises across Scotland which could help to sustain smaller communities.

115. Several community councils and environment and heritage groups are less certain about the proposals. They worry that over-relaxation of green belt policies for existing established uses and non-conforming uses could lead to unnecessary loss and damage to green belts or a green belt peppered with holes. Particular concern has been expressed over educational uses and airports because of the amount of traffic they generate, and there is also a concern that established uses may pursue development unconnected with their main purpose: housing to raise funds for a research institute for example. It is suggested that where existing uses make an important contribution to green belt objectives they should be retained as green belt land.

116. A few respondents would like a clear statement that their uses should be excluded from any green belt designation. The British Holiday & Home Parks Association Ltd points out that many members have established businesses in the countryside and make a big contribution to the Scottish tourist economy. It feels that the ability to reasonably develop these should not be inhibited by designation. And as noted already, Scottish Water also believes its operational facilities and infrastructure should be amongst the established uses explicitly excluded from GB designations (see previous section).

Proposals for non-conforming uses – paragraphs 24-26

117. The responses indicate that the draft policy statement on non-conforming uses is generally welcomed, and some hope it will lead to more consistent decisions for developments in the green belt. Some of the responses, mostly from planning authorities and environment and heritage groups, argue that the wording could be more precise. There is a worry for example that the terms “established need” and “no other suitable site available” are open to wide interpretation and could become loopholes for inappropriate development. There is a feeling that the present wording could jeopardise the “strong presumption against development” outlined earlier in the draft and that the exceptionality of non-conforming uses should therefore be more forcefully expressed.

118. There is recognition that existing institutions can exert pressure on the green belt, not only within but also adjacent to their grounds, and little disagreement that some provision should be made for their expansion. One respondent did observe that pressure on the green belt is not simply from private sector developers and landowners and that some of the biggest breaches in the green belt have come from the Scottish Executive, for example, major hospitals or new buildings for national agencies. However, on the whole, the consultation responses endorse the idea that developments that meet an established need or national priority should be allowed where they are highlighted through the development plan. There is a view that for this to be effective development plans must be kept up to date, and in a similar token there is a feeling that non-conforming uses should be widely publicised so that local communities can be better involved in the decision of whether a development should be permitted or not.

119. There is general agreement that some provision should be made for the redevelopment of redundant institutional grounds, but again this is accompanied by some concern that the wording in the draft SPP is too relaxed and could give undue encouragement to the establishment of non-conforming uses. The use of comprehensive development schemes is welcomed, and it is also suggested that inappropriate redevelopment could be avoided by greater use of the development plan as a vehicle for guidance. One response suggests that non-conforming uses should not be restricted to redundant institutional uses and could cover any redundant uses that lie in green belts.

120. The responses indicated that there are circumstances when allowing new development is sometimes necessary for the successful conversion of listed buildings. The Farningham

McCreadie Partnership goes further and suggests that enabling development should also be allowed for the conversion of non listed buildings. There is an acceptance that the redevelopment of institutional or corporate estates in the green belt needs to be sympathetic to its surroundings and this is seen as particularly important where listed buildings or their settings need to be safeguarded.

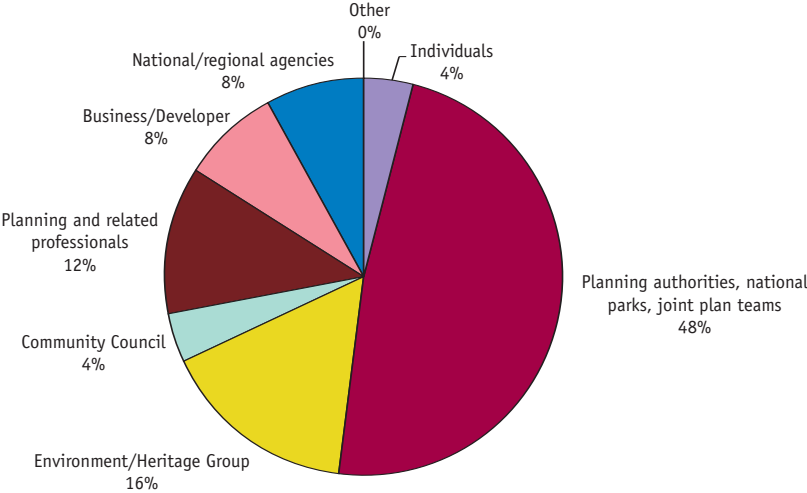
121. The idea of green belt exceptions to meet national priorities or established needs where suitable alternative sites are not available gets support from some quarters, Scottish Enterprise Edinburgh & Lothian for example. Others are more cautious, Peter Branney taking the view that this approach seems too broad, and warning that while exceptions should be highlighted in development plans, the public must be involved in these decisions which should not be left to negotiations between developers and planners.

Departures from the development plan – paragraph 27

122. Only a small number of responses comment on this section of the draft SPP, most supporting the notification arrangements or welcoming the review of the circular. One stresses the need for Scottish Ministers to be consistent in their decisions, and two take the view that only significant non-conforming developments should require to be notified.

MANAGING THE GREEN BELT RESOURCE – paragraphs 28-30

Managing the green belt resource: spread of comments from respondents



123. This section draws comments from all the respondent groups, with a good number from planning authorities and professionals. Overall, responses welcome the emphasis on the positive management of green belt, but there is some scepticism from authorities about how such a policy could be implemented successfully.

124. For example Fife Council warns that there is a limit to how far planning can change land management, and East Lothian Council asks whether green belt gives any more impetus for positive management than other planning policies. Renfrewshire Council is unclear where the remit for identifying management initiatives lies. Several responses think that more guidance on green belt management is required, perhaps in the form of a planning advice note. Others emphasise that successful management needs matching resources, whether to look after woodlands, develop new path networks, or tackle fly tipping.

125. There is general support for mechanisms like management agreements and community planning partnerships. Measures that improve access to the countryside seem to be particularly welcome as are those that involve communities, landowners, and other stakeholders. One response makes the link between landscape improvements and the creation of defensible green belt boundaries.

126. Some respondents suggest that the effect of edge-of-settlement planning on green belts needs care and attention, and one points out that protection through planning conditions might support a more positive approach to management. Pressures of litter and vandalism can lead to long-term degradation which can make holdings difficult to use as mainstream rural land. This response suggests that since landowners in the green belt forfeit potential development gains, it would be sensible to work with them to invest to make green belt land as useful and attractive as possible.

CONCLUSIONS – *paragraph 31*

127. Very few responses mention this final section of the draft SPP. Jackton & Thorntonhall Community Council supports the conclusions, the Edinburgh and Lothian Greenbelt Network suggests some minor re-wording, and the Helensburgh Study Group thinks that a glossary would make a useful addition.

KEY THEMES OF THIS ANALYSIS

128. Some of the key themes can be summarised as follows:

- **Clarity about how things should be done**

This analysis highlights quite a few issues upon which respondents are seeking more clarity. Some of these are very big issues indeed. The main ones for those engaged in planning and development concern timescales, boundaries, and above all the mechanisms for green belt review and land release. Respondents are also looking for a little more clarity about suitable green belt uses.

- **Linkage to related policy areas**

The way in which green belt policy should be linked to other Scottish Planning Policies, such as those for housing and other land uses, and the interface with the policy for rural development, is another area where respondents are left wanting more.

- **A role for community involvement**

Some respondents think that community involvement in planning policy issues such as this should be given stronger signals and more guidance in the document.

- **The order of things**

Many of the responses reveal a common understanding that green belt policy is first and foremost about quality issues like settlement identity.

- **Preventing coalescence**

In light of this widely-held view, the absence of reference to coalescence and sprawl as issues in the body of the draft text attracts some comment.

- **Smaller settlements**

Because of its widespread appeal as a well-recognised planning policy, many see green belt as an effective tool and think it could be used to guide the development of smaller towns and villages in some situations.

- **Land values and management**

Underlying many of the responses, especially those that focus on finding practical measures to improve design and the quality of the environment, are issues concerned with land values and incentives to its good management.

- **Particular places**

When respondents discuss green belt issues, they often have places vividly in mind where the reality of policy can be expressed and vulnerabilities exposed. Among the examples mentioned are Aberdeenshire around Aberdeen, Kinnoull Hill, Perth, St Andrews, Helensburgh, Balfron in Stirlingshire, Joppa Hillhead and Coynton in Ayrshire, Philipshill and Stewartfield in East Kilbride, Gogar and the airport environs west of Edinburgh, Currie and Balerno, Edinburgh's Arthurs Seat and Corstorphine Hill, the Edinburgh – Midlothian boundary, and Inveresk.

- **Legacy for the future**

This analysis has summarised some of the detail of responses, relating them to the draft text of the SPP. But the responses also reveal the extent to which the green belt projects many people's deepest hopes and fears for the future. One respondent points out simply: "Space is essential for life, green space enriches life, green space is an irreplaceable priceless heirloom". Another remarks that "*the green belt must be protected now and well into the future or Glasgow, the Clyde Valley and the other principal cities of Scotland will resemble Los Angeles multiplied a number of times*".

Some closing remarks

129. The range of responses to this draft green belt policy consultation can be seen in one sense as an argument over possession. On one hand it is clear that those in the business of development and planning want to redefine and clarify the use of the green belts as an operational tool, as one of a number of the tools in the professional bag to serve the needs of a positive settlement strategy. On the other hand there is no doubt that this well-recognised policy has taken on a life of its own. For many individuals, communities and groups, green belts now have both a physical reality and a symbolic importance. Once individuals and businesses have taken account of the green belt in life choices and investment decisions, they are reluctant to see it taken away or tampered with.

130. It would be wrong though to characterise the responses as merely motivated by self-interest. There is plenty of evidence that people coming from different perspectives are

willing to engage with other points of view. And the place-value that people are concerned about is as much to do with perceptions of quality and practicality as with any purely financial balance sheet.

131. Many in the business of development and planning have made valuable suggestions that focus precisely on these issues of quality and practicality.

132. In short then, analysis shows the draft planning policy has been successful in gathering broad support for many of the essentials it sets out. As far as respondents are concerned, that support is snagged in just a few fairly well defined points, and the particular phrases and omissions which cause difficulties have been analysed in detail here.

LIST OF RESPONSES RECEIVED

with Scottish Executive reference and category assigned

“Withheld” signals a request that the respondent’s name be kept confidential. All non-confidential responses may be viewed on the Scottish Executive website:

<http://www.scotland.gov.uk/Publications/2005/12/02114906/49066>

Business/developer

- 73 Bellway Homes (through Barton Willmore Partnership)
- 144 Boyack Homes Ltd (through Barton Willmore Partnership)
- 146 British Holiday & Home Parks Association Ltd (through Montgomery Forgan Associates)
- 127 Drum Estate (through Forbes Marr)
- 116 Elphinstone Group
- 103 Homes for Scotland
- 123 Mactaggart & Mickel Ltd (through PPCA Ltd)
- 153 Premier Property Group (through Turley Associates)
- 28 Scottish Equestrian Association
- 145 Scottish Rural Property & Business Association
- 131 Stewart Milne Holdings
- 138 University of Glasgow (through Muir Smith Evans)

Community councils

- 172 Association of Community Councils
- 132 Bridge of Don Community Council
- 168 Bridgend, Gannochy & Kinnoul Community Council
- 4 Broomridge Community Council
- 67 Broomridge Community Council
- 42 Broughty Ferry Community Council
- 63 Bucksburn of Newhills Community Council
- 66 Currie Community Council
- 88 Helensburgh Community Council
- 59 Jackton & Thorntonhall Community Council
- 18 Kingsway West Community Council
- 160 Royal Burgh of St Andrews Community Council
- 140 Strathblane Community Council
- 157 Withheld
- 155 Withheld
- 130 Withheld

Environment/heritage groups

128	Avondale Civic Society
129	Central Scotland Forest Trust
106	Clydebelt
134	Cockburn Association
11	Colinton Amenity Association
7	East Kilbride History Society
30	East Kilbride History Society
113	Edinburgh & Lothians Greenbelt Network Steering Group
122	Edinburgh Green Belt Trust
62	Friends of the Pentlands Society
101	Helensburgh Green Belt Group
108	Helensburgh Study Group
9	Inveresk Village Society
120	Moray Friends of the Earth
147	Park of Keir Friends Ltd
85	Ramblers' Association
29	Scottish Civic Trust
110	Scottish Green Belts Alliance
111	St Andrews Green Belt Forum
117	Withheld

Individuals

21	Councillor Jim Bollan
3	Peter Branney
6	Rev J Colin Caskie
69	Ms/Mrs Monica Clark
1	Lindsay Craik
32	G D Curran
51	Ms/Mrs Susan Dick
48	P Doughty
97	Peter Dudney
71	Jeremy and Marcelle Edwards
33	Mrs Eileen M Gibson
118	Mr S Gibson
105	Mrs Jennifer A Hopgood
14	O&A Humphries
26	Miss Isobel Hunter
109	Alastair Macbeth
40	Ms/Mrs I McWhirter
54	David A Marks

34 Mrs Thomasina S Milne
23 Mr & Mrs J Moore
89 Ms/Mrs Elaine Nelson
41 Ms/Mrs Jean Nish
50 Ian Petrie
37 Ms/Mrs M J P Pollok-Morris
70 Mr Ian N and Mrs Leila F L Reynard
83 John Robertson
100 Mr John Russell
115 Ms Susan Shannon
78 Kathleen Siddle
159 P. Uprichard
38 Dr Percy and Mrs Aileen Walker
56 Rhona M Weir
8 Withheld
12 Withheld
13 Withheld
15 Withheld
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19 Withheld
20 Withheld
22 Withheld
24 Withheld
31 Withheld
39 Withheld
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104	Withheld
119	Withheld
133	Withheld
156	Withheld
158	Withheld
161	Withheld
171	Withheld
52	Douglas Young

National/regional agencies

169	Architecture+Design Scotland
2	Scottish Enterprise Edinburgh & Lothian
72	Scottish Natural Heritage
126	Scottish Water
10	SportScotland
35	Withheld
154	Withheld
164	Withheld

Other

114	Brethren's Gospel Trusts
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Planning and related professionals

142	James Barr
121	Farningham McCreddie Partnership
68	Neil Gainford MRTPI
149	Law Society of Scotland
99	MBM Planning & Development
137	Muir Smith Evans
25	Royal Incorporation of Architects in Scotland

- 125 Royal Institute of Chartered Surveyors in Scotland
- 151 Royal Town Planning Institute in Scotland
- 136 Scottish Planning Consultants' Forum
- 124 Alistair G Stark

Planning authorities, national parks, joint plan teams

- 107 Aberdeen City Council City
- 36 Aberdeenshire Council
- 58 Angus Council
- 61 Argyll & Bute Council
- 163 Ayrshire Joint Structure Plan & Transportation Committee
- 141 Clackmannanshire Council
- 112 Dundee City Council
- 64 East Ayrshire Council
- 165 East Lothian Council
- 139 East Renfrewshire Council
- 150 City of Edinburgh Council
- 135 Fife Council
- 5 Glasgow & Clyde Valley Structure Plan Joint Committee
- 102 Inverclyde Council
- 148 Midlothian Council
- 173 North Ayrshire Council
- 162 West Dunbartonshire Council
- 170 North Lanarkshire Council
- 166 Perth and Kinross Council
- 143 Renfrewshire Council
- 27 Shetland Islands Council
- 57 South Ayrshire Council
- 152 Stirling Council
- 167 Withheld

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