



Clydebelt

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24th October 2005

Sandra Carey,
Scottish Executive Development Department,
Planning Division, 2 - H,
Victoria Quay,
EDINBURGH, EH6 6QQ.

Dear Ms Carey,

Consultative draft Scottish Planning Policy 21: Green Belts

1. Clydebelt's interest in green belts

I am sending this response on behalf of Clydebelt. Clydebelt is dedicated to retaining and enhancing our heritage and the green belt status of the Kilpatrick Hills and their surrounding environment in Clydebank, Dumbarton, Milngavie, Bearsden and Glasgow. Clydebelt is concerned with other undeveloped areas nearby, including the north bank of the River Clyde, and in the "villages". Clydebelt has acted on many issues concerning the green belt around the NW of Glasgow and in East and West Dunbartonshire, and regularly comments on local, regional and national planning policy.

The draft SPP has been discussed at several meetings of Clydebelt, and with other organisations in the Scottish Green Belts Alliance, of which Clydebelt was a founding member.

2. Clydebelt welcomes much of the draft SPP

Clydebelt welcomes the draft SPP's intention to improve on Circular 24/1985, and to "strengthen and enhance the role of green belts and to encourage greater stability to increase their effectiveness" (para 5) with "strong presumption against new development within green belts" (summary and para 20).

We strongly agree that "to achieve long-term certainty" a green belt "should have a timeframe of at least 20 years" (para 16). We also endorse that "Strategic Environmental Assessment of development plans will ensure that the environmental consequences of the development strategy are rigorously examined" (para 14).

We are glad that Scottish Ministers, in the draft SPP summary, "recognise the need to avoid urban sprawl" and intend "to shape our towns and cities in a sustainable way". We see that "regeneration of disadvantaged communities and the re-use of vacant urban land are key priorities of Scottish Ministers"

(para 3) should lessen pressure on green belts. We are very keen that “green belts should ... enhance the quality of life for local people” (para 10).

3. Clydebelt’s most important concerns about the draft SPP

We have several concerns about aspects of the draft SPP. Many arose because the draft does not seem to provide enough precision in its guidance. Such detail is not available in any proposed associated PAN or Circular, nor is given in other SPPs. A significant number of our concerns are about whether the need to conserve and enhance the character of towns and cities, the quality of life in their communities and the green belt itself are treated less importantly than the Executive's priority to promote economic growth in Scotland.

The following are our most important concerns.

3.1. Objectives (para 6) and definition

3.1.1 We consider that para 6 should include all of the objectives of green belt policy, not just a few “key” objectives. We strongly urge that the objectives of this policy should also include the following items that frequently occur in green belt policies elsewhere, and are indeed stated or implied elsewhere in the draft SPP and in its announcement by the Minister:

- *To provide continuity of green belts through strong presumption against development within them;*
- *To prevent coalescence of settlements and avoid urban sprawl and ribbon development;*
- *To protect and enhance the character, setting and identity of towns and cities;*
- *To protect the natural and cultural heritage of green belt open space within and around towns and cities, as part of the wider structure of green spaces for amenity, tourism and recreation;*
- *To protect and enhance the rural character of countryside adjoining towns and cities for future generations.*

We also suggest that the first bullet point of the objective in para 6 should be amplified to include “to assist sustainability by redeveloping vacant urban sites”.

3.1.2 We also consider that the draft does not define green belt adequately, para 8 having: “a green belt is an area of land designated for the purposes of managing the shape of a town or city in the long term.” We see it that essentially green belts are a planning mechanism to control land use change and prevent/restrict new buildings. We feel that it should include all of the points in

“green belt is designated open land which is around, beside or within an urban area and for which there is a strong presumption against development except for specified, mostly rural uses. It is the outcome of a long-term settlement strategy of at least 20 years (see paragraphs 14 and 16) to achieve the objectives listed in paragraph 6 and will direct the shape of a town or city in the long term”.

Para 10 should be enhanced to include: “Designated green belts, especially their sensitive, inner margins along the edges of settlements”, should be robustly protected and managed effectively to enhance the quality of life for local people. An additional bullet point would be helpful:

- *Assisting green tourism;*

3.1.3 It would be very helpful for the summary to include at least the “countryside” in its first paragraph. as: “Green belt policy is one of a range of mechanisms that can help to shape our towns, *cities and adjoining countryside* in a sustainable way”. It would also be useful to include “*tourism*” benefits in the summary’s third paragraph.

3.2 Establishing and reviewing boundaries and timeframes (paras 14, 16)

3.2.1 Rigorous reviews leading to each 20-year period of certainty.

As we strongly agree that “to achieve long-term certainty” a green belt “should have a timeframe of at least 20 years” (para 16), we consider it is essential that there is a rigorous and open review of circumstances at the start of each 20-year green belt period. We consider that precision is needed about the data that will be required and the considerations that should be part of such reviews. This aspect is one of several where it would be appropriate to produce a Circular or PAN on data required and aspects to be considered in reviews, and the criteria upon which informed judgements are to be based. We also propose that SEIRU should check the thoroughness of each review to ensure that these issues have been taken into account adequately.

Para 14 should end with “Strategic Environmental Assessment of development plans will help to ensure that the environmental consequences of the development strategy are rigorously examined. *However, since planning will be for a 20-year period, a fuller than usual range of data collection will be required, especially a full audit of brownfield sites, derelict and underused buildings and urban areas and landbanks held by authorities, developers and others. There should also be a compilation of sites requiring special protection such as areas of cultural and natural heritage, areas contributing to tourism and local access, key environmental features designated by local community groups, and entry points to towns at risk of ribbon development*”.

The identification of areas surrounding towns and cities for expansion that would affect green belts should be carefully assessed and based upon an environmental audit to assess the capacity of areas to accept change without unacceptable damage to their qualities. Para 16 should not conclude with “Inner boundaries should not, therefore, be drawn too tightly” - these boundaries should be drawn as tightly as necessary in each particular portion of green belt.

3.3.2 Releases of green belt land. We suggest adding in para 19 “Where major releases of green belt land are planned, consideration should be given to the potential for expanding that green belt at another location, *whose value is equivalent to that lost in the released area*”. However this is not always appropriate - beyond the green belt north of Clydebank we have the Kilpatrick Hills Regional Scenic Area. Redesignating part of the RSA as green belt would not be restitution of lost green belt closer to the town. The community would perceive an overall loss.

It is essential that the principle of “strong presumption against new development within green belts” (summary and para 20) should apply at this review stage as well as during development control. Paragraph 23 of SPP 3 on choice of housing types should not be used to justify reallocating green belt land.

4. Other concerns about the draft SPP

4.1. Need for policy to deal with differing circumstances across Scotland

We consider that there is inadequate recognition of differing circumstances across Scotland (eg in paras 2 – 6). One way to redress this would be to include (eg following para 5 “In some areas, however, existing green belts are not providing long term certainty and have been undermined by piecemeal development management decisions”) an explicit statement that “*a policy for the equitable distribution of growth throughout Scotland would ease the pressure on certain green belts like Aberdeen and Edinburgh*”.

But we do not believe that differences should be catered for too finely. The G&CV Structure Plan has been strong on coordinating the green belt policies, which has assisted local councils in resisting unsuitable developers. Each contiguous green belt needs coordinated policy and coordinated development control.

We are concerned that the draft does not give explicit encouragement for the creation of new green belts, where green belt policies would give greater protection for the natural and cultural heritage surrounding settlements than other countryside policies. We suggest that para 12 should conclude with: “*Whilst green belts may not be needed for some settlements, new green belts, as valuable planning tools, should be encouraged where appropriate.*”

4.2 Inadequate protection of various aspects of green belts

We believe that the draft policy is too permissive for growth in existing established uses and non conforming uses. This could lead to unnecessary loss and damage to green belts (paras 23, 25).

We suggest deletion in para 23 of “All other uses should be covered by the green belt designation to afford a greater level of control over new development.” and replacing the whole paragraph by:

“Existing uses *such as* settlements, major educational and research uses, major business and industrial operations and airports, *should be explicitly excluded from green belt designations* to allow for growth and change. *However, key green spaces within such uses that make an important contribution to Green Belt objectives should be retained as green belt to afford a greater level of control over new development. For similar reasons, all other uses should be covered by the green belt designation.*”

In para 25 on existing institutions in large grounds we feel that it should be made clear near the end of the paragraph that “*All undeveloped land outwith the original building envelope should be reused in ways that support green belt objectives in paragraph 6 and other green space policies, especially on publicly owned lands.*” The Clydebank Local Plan specifies an exception as “it forms part of an establishment or institution standing in extensive grounds (such as parkland), provided that the development does not adversely affect the countryside character of the area”. This has been applied to commercial developments, eg permitting an old house with large grounds to become a nursing home, then extended considerably. Some restrictions on the meaning of “institutional” seem to be needed.

The protection of the landscape character of green belts and access to them are specific objectives. So it seems to us inadequate to rely upon other countryside policies to protect these environments in the urban fringe (paras 7, 8, 12) like Areas of Great Landscape Value, which are often not effective.

4.3 Settlement patterns and sustainability (para 13)

. There seems to us to be a lack of emphasis upon the importance of protecting the inner margin of green belts along the urban fringe. Para 13 contradicts the draft’s statement to want to avoid urban sprawl. Sustainable travel solutions are seriously over emphasised and could encourage unwelcome ribbon development. These would promote incursions into green belts without a comparison of the effects of the

resulting loss of these assets and without considering other sustainable aspects. We propose concluding para 13 with *“However, avoiding urban sprawl and strong presumption against development in the green belt provide the foundation for the effective planning of urban growth”*. We also suggest adding after “SPP17: Planning for Transport seeks to reduce dependence on car travel and encourage more sustainable modes of transport” a new sentence: *“However, the benefits of reduced private car use need to be carefully assessed against any adverse losses to Green Belt and green spaces.”*

On sustainability we urge the inclusion in para 13 of text such as in a Local Plan policy: *“Development proposals should be considered against the social and economic needs of a plan area in a manner that does not compromise its future well being and environmental quality. Within the plan area all development should therefore seek to conserve the environmental capital, protect environmental resources and ensure environmental impact is minimised.”*

4.4 Community involvement. Although we are pleased to see reference to community involvement in para 30 of the draft it simply refers to management arrangements. We propose that public / community involvement (distinguished in SPP 1, para. 28, from “just consultation”) should be prominent in the 20-year review process, the drawing up of an advisory Circular or PAN on reviews, the determining of local key environmental features of green belts, the modes of incursion into green belts where they are essential, and the creation of new green belts.

Yours sincerely