



# The future of **Green Belts** in Scotland

**2005**



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preliminary assessment by  
**The Scottish Green Belts Alliance \***

\* The Scottish Green Belts Alliance is comprised of voluntary countryside, green belt and other organisations from across Scotland. The present report was compiled with the assistance of the following, most of which are Alliance members :

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Clydebelt [covering green belt around Dumbarton, Clydebank, Bearsden and Milngavie]  
The Aberdeen City Environmental Forum  
The St. Andrews Green Belt Forum  
The St. Andrews Preservation Trust  
The Helensburgh Green Belt Group  
The Helensburgh Study Group  
The Kyle and Carrick Civic Society  
The Stirling Civic Trust  
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# THE FUTURE OF GREEN BELTS IN SCOTLAND

## Introduction

Green Belt is designated open land which is around, beside or in an urban area and for which there is a presumption against development, except for specified, mostly rural uses.

The Scottish Executive has been reviewing Circular 24/1985 on countryside and green belts and will replace it with a Scottish Planning Policy (SPP). The present paper offers an assessment of the issues by the Scottish Green Belts Alliance before release of the draft SPP. The Alliance will publish further comments after the draft SPP has been made public..

SPPs are important. Authorities are expected to follow their guidelines. Replacement of Circular 24/1985 by an SPP could (and in our view should) give green belts more prominence. What is at stake is more than just the nature of green belts, but also, to a degree, the nature of our villages, towns, cities and countryside. Whether the new SPP will improve and strengthen green belts or weaken them will depend on content, but we strongly advocate the former. Long term, Scotland-wide benefits, recognising diversity, should drive the SPP rather than local pressures, though these have to be recognised. Our report seeks a principled way forward.

On 23rd January 2004 the Scottish Executive hosted a one-day seminar on green belts. The focus was an introduction to a study by a team from Heriot-Watt University which carried out a literature search on green belts, a review of development plans and case studies in (i) Aberdeen and Aberdeenshire, (ii) Dundee and Angus, (iii) Edinburgh and Midlothian and (iv) aspects of Glasgow and the Clyde Valley. The time scale and funding for this helpfully contributory study were limited and other areas with green belts or introducing them were omitted. Also, some aspects of the seminar caused us disquiet. The final Heriot-Watt report had not been released at the time that our present paper was compiled by our member organisations. An appraisal of the Heriot-Watt University report is provided in Appendix 4 of this paper.

We do not have definitive figures, but we understand that there are just under 200,000 hectares of green belt in Scotland, with others to be introduced. England has about 1,500,000 hectares.

## A. Purposes and the success of Green Belts

Scottish Circular 24/1985 is sometimes reported as giving three purposes for green belts since three statements of purpose from a previous Circular are reported in section 3 of the Annex. However eight purposes may be identified in the Circular's text. They are :

- S 1. to maintain the identity of towns by establishing a clear definition of their physical boundaries (Annex 3i);
- S 2. to prevent coalescence of settlements (Annex 3i, but not identical to S 1 above);
- S 3. to provide countryside for recreation (Annex 3ii);
- S 4. to provide for institutional purposes of various kinds (Annex 3ii);
- S 5. to maintain the landscape settings of towns (Annex 3iii);
- S 6. to encourage developers to use 'derelict, vacant and underused sites within the urban area' (main text, para. 7);
- S 7. to provide stability 'where there are strong development demands on land adjacent to large towns and cities' (Annex para. 4);
- S 8. to contribute to the avoidance of urban sprawl and ribbon development (main text, 3ii; this refers to the countryside, but it has special relevance to green belts).

The English Planning Policy Guidance 2 (PPG 2) contains the following purposes :

- E 9. to check the unrestricted sprawl of large built-up areas;
- E 10. to prevent neighbouring towns from merging into one another;
- E 11. to assist in safeguarding the countryside from encroachment;
- E 12. to preserve the setting and special character of historic towns;
- E 13. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

S 2 coincides with E 10. There is a link between S 1 and E 12, though E 12 refers specifically to historic towns. There is a similarity of intent between S 5 and E 11, though S 5 emphasises the beneficial effect of surrounding countryside on towns. Checking sprawl is common to both (S 8 and E 9). The recreational purpose in S 3 does not appear as a purpose in the English version but the PPG refers to it under another heading (para. 1.6). The crucial point about urban regeneration (E 13) is implicit in S 6.

Other purposes have appeared elsewhere. These include :

- 14. to assist sustainable development;
- 15. to encourage efficient use of urban land / 'smart' urban design;
- 16. to safeguard natural heritage for future generations
- 17. to provide a degree of certainty, a presumption of permanence, to land protection.

Other purposes might be described as 'associated' rather than central. They are desirable outcomes for which policies can be pursued irrespective of green belts, but which are more readily achieved with green belts. Thus, in our view, green belts are contributory to them. They are :

- 18. to improve the quality of town fringe countryside;
- 19. to supply settlements with fresh produce from local agriculture and horticulture;
- 20. to enhance agriculture, forestry and related uses of land, including improvement to degraded land around towns;
- 21. to protect woodlands, water gathering grounds, plant life, wildlife and landscape;
- 22. to provide a source of education and good health for each generation.

All the above purposes seem appropriate and might be included in a revised SPP.

More broadly, green belts can be viewed as **civic conscience**. There is a long history of society constraining some aspects of some commercial interests, from the abolition of slavery and child labour through to modern Health and Safety regulations. In planning, the development control system provides similar checks and bodies such as SNH and Historic Scotland contribute to ensuring that environmental, cultural and social aspects are respected. The new Strategic Environmental Assessment procedures will assist. Green belts are a crucial tool in this process. If, as we believe, commercial influence in planning is increasing (see B (vii) below), then the ethical role of planning authorities becomes more important. If that is true, then the need to reinforce green belts through the new SPP becomes significant. In a sense there may be a slight shift of onus for civic conscience from planning authorities to the Scottish Executive.

Another way to look at green belt purposes is to divide them into three categories :

- (i) those which contribute to the quality of settlements and residents' lives;
- (ii) those which contribute to the quality of countryside;
- (iii) those which contribute to sustainable development for future generations.

With regard to sustainable development, since that is a high profile political objective, adherents of every viewpoint seem to want to recruit it to their cause. Those seeking development in green belts argue that leapfrogging over green belts for new settlements increases commuting and therefore car use which is non-sustainable. In contrast, the 1998 report by consultants Llewelyn-Davies *Green Belts : Frames or Fragments?* argues (pages 9-10) that green belts positively reinforce sustainability by :

- promoting urban containment, thereby directing growth pressures to the existing urban area and aiding urban regeneration;
- protecting the countryside and associated natural resources;
- conserving the character and setting of historic towns and cities.

In Appendix 3 we discuss the issue of the contribution which green belts make to sustainability. The weight of logic suggests that reinforcement of green belts meets the objectives of sustainable development more than damage to green belts. More data are needed about the extent to which larger and therefore more self-contained (shops, schools, workplaces, etc.) villages in or outside the green belt reduce domestic car use and the extent to which urban sprawl into green belts would increase it. However, car use is only one of a range of sustainability factors and it would be wrong to over-emphasise it.

Green belts are multi-functional. That they serve several purposes is one of their strengths. In any given locality one purpose may be more important than in another. That is an advantage, not a weakness, even though it adds complexity.

In our view a new SPP on green belts might include all the purposes listed above, even though some (e.g. the associated purposes 18 - 22 above) could be listed in a supportive rather than a mainstream category.

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Despite periodic calls for modifying and even abolishing green belts, there appears to be much consensus that green belts have generally been successful in meeting their diverse purposes. Whether their origins are traced back to the 19th century, or to the London County Council's 1935 proposal or to the initiatives of the 1940s, there can be little doubt of the long term adherence to and popularity of green belts. Like democracy, the green belt principle can be criticised in detail but is sound in concept. Most informed reports want to retain them.

Elson (*The Effectiveness of Green Belts*, 1993, page 88, para. 5.11) reports that planning authorities have valued :

- the simplicity of the green belt as a policy;
- its robustness;
- ease of enforceability;
- its ability to secure its objectives over the longer term.

Circular 24/1985 refers to 'a generally accepted control of development of Scottish countryside'. Elson (2002) noted a common wish to retain green belts, though there might be modifications.

In Scotland green belts continue to serve the designated purposes. Levinthal (1994) described the Edinburgh green belt as 'one of the most successful and supported planning policies'. Positive references to green belts can be found in many official publications including the Scottish Executive's *National Planning Framework for Scotland* (2004, para. 149) and the Glasgow and Clyde Valley joint (eight authorities) Structure Plan 2000. A range of other examples could be given, including their relevance to places suffering severe development pressures such as Edinburgh and Aberdeen. Benefit has been evident in both conurbations and small towns whether 'washed' into city green belts or having self-standing green belts of their own. This applies on both sides of the border and new green belts have been and are being created.

Therefore the issue does not appear to be one of questioning the validity of green belts but of updating procedures related to them so that the purposes listed above continue to be achieved while adapting to current and likely future circumstances. We consider that the extended-term effectiveness of green belts should be the starting point for assessing their role in 21st century planning. Localised problems and discussion of possible modifications to meet exceptional development pressures (e.g. in Edinburgh and Aberdeen) should not be seen as challenging the fundamental values of green belts nor, we suggest, should a national system be founded on ways to settle problems in particular areas.

As shown above, green belts are multifunctional and different purposes provide for different circumstances. Green belts are tools for strategic planning and not local landbanks. In our view they need to be strengthened and used strategically.

## B. Pressures to erode green belts

Here eight potential pressures to override green belt controls are considered : (i) necessary public infrastructure, (ii) business and industry, (iii) population and housing, (iv) inter-authority financial competition, (v) urban-rural boundaries between authorities, (vi) other financial pressures, (vii) the distorting effects of publicised pressure-points and (viii) the planning system's seeming bias to favour developers.

### (i) **Necessary public infrastructure**

Airport extensions, park-and-ride schemes, sewerage works, cemeteries and other public facilities at first sight seem to provide valid exceptional grounds for expansion into green belts. Some (e.g. waste disposal, some forms of renewable energy, telecommunications ground stations and masts) are not neighbour-friendly and offer heightened arguments for acceptable countryside locations. Inconspicuous siting, high quality design, screening and landscaping contribute to the process of siting such facilities and remoter countryside is preferable to green belt locations for many of these. Specifically on wind farms and telecommunication masts, an indicative strategy is urgently needed for their location on sites which minimise environmental impact.

Yet the fact that something is a public facility should not automatically justify countryside – and still less green belt – location. Institutions which serve people, such as schools, universities, hospitals and community centres, must be accessible by people and town fringe sites can often be inappropriate, unless the town is small enough for easy access. While public infrastructure arguments may be advanced in support of incursion into green belts, it seems reasonable that such claims should be treated with caution and be regarded as exceptional, should be on a site-by-site basis and should only be considered when there is demonstrably no alternative.

### (ii) **Business and industry**

The government's *National Planning Framework for Scotland* (2004, para. 110) states 'Across Scotland there is already a plentiful supply of land for business and industrial development . . . The majority of business locations have already been identified.' From this it might be reasonable to assume that incursion into green belt for these purposes should not happen. However, controversy continues and there seems to be a need for an audit to assess realistic demands and the extent to which currently vacant and unused office and industry space can be used for other purposes such as housing. The evidence that town-fringe supermarkets harm town centres of small and medium sized towns by becoming rival 'town centres' is now well established and government policy rightly advises against them. That would apply to supermarkets, shopping malls or other outlets, such as some large scale 'garden centres' which are extending beyond their horticultural origins and becoming akin to general retail centres.

### (iii) **Population and housing**

Scotland's population is steadily shrinking. It is at its lowest level since the first half of the 20th century (General Register Office for Scotland, 2003) and dropping. The Office of National Statistics predicts that the fall in Scotland will accelerate, with a head count declining by 285,000 in the next 25 years.

Yet in some areas population rose between 1991 and 2001 – e.g. Edinburgh (+7%), West Lothian (+10%), East Lothian (+8%), Falkirk (+4%). These are areas where green belts are most likely to come under pressure and give rise to calls to modify them. There is a danger that those circumstances may be regarded as typical or be allowed to distort green belt policies as a whole.

Glasgow and the Clyde Valley, with Scotland's largest green belt area, has generally experienced marked falls in population – e.g. Inverclyde (-9% over 10 years), Glasgow (-8%). Figures over 20 years are starker yet and show that this is a long term trend : – e.g. Glasgow City (-18.8%), Inverclyde (-16.8%), West Dunbartonshire (-11.7%). It is not a simple east / west split. For example, Dundee's population has been falling. **It is important that the growth-related problems in exceptional areas should not distort green belt policies elsewhere.**

Housing is linked to population, but that is not the only factor. Household sizes have been reducing for several reasons, including a diminishing birth rate, rising life expectancy and divorces with more people living alone or in smaller units than in the past. These cause a current rise in demand for houses. The trend to smaller households is likely to level off since people still tend to co-habit and to have children. The 2001 census indicated that the average household size was already down to 2.3 people, so we may expect the trend to start to level off quite soon. In the longer term, falling population (rather than household composition) is likely to be the more crucial factor.

The facility to build houses on brownfield or derelict / vacant land is greater in the west than in parts of the east. Where population is falling there seem generally to be fewer calls for green belt release for development. It is not surprising that the Glasgow and the Clyde Valley Joint Structure Plan (2000, page 29) resists housing development in the green belt, including isolated, sporadic, low density and low impact housing. Even in areas of population growth green belts can help to direct development towards underused sites, though there are likely to be fewer unused sites and land pressures can be greater.

In some City Regions (especially in the east), the forecasting of substantial land required for housing is a major driver for the release of green belt land. However, the present methodology for calculating housing demand and associated forecasts of land requirements might be reassessed to distinguish need from stimulated demand, to relate demand to environmental issues (which tend not to be given weight) and to reduce the way in which some forecasts may become self-fulfilling prophesies. If greater accuracy proves difficult, then targets might reflect the uncertainty and local views carry more weight.

#### **(iv) *Inter-authority financial competition***

Revenue to authorities is population-related. Council tax is substantially geared to housing and therefore to population. Also, about 80% of central government grants are based on population in different ways.

If council finance is so tied to population, it might be expected that councils will vie with each other to attract residents – what one authority has described as ‘poaching’. This has a bearing on green belts. It is tempting for authorities to release green belt land to attract developers and increase population at the expense of neighbouring authorities.

We have little data on the extent to which this is a problem, but it appears to be happening in places, especially where population is falling. If so, then it is an argument for greater inter-authority cooperation and consistent enforcement of green belt controls across boundaries. To a degree that has been achieved by the 8 authorities combining in the Glasgow and Clyde Valley Joint Structure Plan, but resentment is caused if contiguous authorities such as Argyll and Bute seek to adopt contrary policies.

(v) ***Urban-rural boundaries between authorities***

In places it seems that the way in which boundaries between authorities have been drawn at reorganisation (or since) has stored up problems for green belts and for revenues to authorities.

If a boundary has been drawn between an urban authority and its commuter towns and villages which house some of its employees, it would seem that two problems may arise :

- (a) Council tax and central government grants which are population related (see (iv) above) go to the rural authority. To attract population-related revenue, the city may be tempted to develop in the green belt to attract people and therefore funding.
- (b) The urban authority finds itself facing infrastructure costs related to commuting from the rural authority.

Thus two financial pressures may result if boundaries separate a city from its commuters, a situation which may incline the city to turn to green belt land to reverse the trend. Town fringe green belt, especially sensitive and in need of protection, is at risk. We speculate that revision of authority boundaries might assist in some instances.

(vi) ***Other financial pressures***

Other financial pressures not only contribute to the erosion of green belts, but further illustrate the way in which circumstances differ between parts of Scotland, thereby emphasising the danger of allowing the experience of pressure-points to distort the whole green belt picture.

(a) ***House prices***

Rising house prices are usually taken as an indicator of demand for more houses and there may be an element of truth in that. However, it is arguable that the 'offers over' aspect of the Scottish sale system may also be contributing to unrealistic inflation of house prices as sellers seek to maximise profits. Moreover, there appears to be a significant amount of new-build property for sale or rent, implying over-production in some areas or treating property as investment rather than to meet genuine need. Holiday homes may be part of this trend in some areas.

(b) ***VAT***

VAT has to be paid on repair work (but not on new build) and adds to costs of remediation of brownfield sites or re-use of existing buildings. The developer has to put more effort and finance into building on previously developed land. It may not be possible to use standard designs on old sites, thus increasing costs and reducing financial return. So greenfield sites are cheaper and more attractive to developers. A review of VAT procedures to encourage redevelopment of brownfield sites and discourage green belt pressures seems to be needed.

(c) ***Landbanks***

A professional developer needs landbanks to ensure continuity of profits to shareholders. When times are hard for farmers and their profit margins are low, selling their land and retiring from farming may be a way to clear indebtedness. Developers may then buy land cheaply and may put pressure on planning authorities to release (their bit) of green belt land for development, using the argument that they can quickly satisfy housing demand to meet the authority's targets in those areas

(especially in the east) where there is target-based need. There seems to be a potential vicious circle. The more that authorities give in to these calls to release green belt land the more the developers will be encouraged to buy or take options on green belt land and call for yet more green belt release. This is a major threat to retention of green belts. It would be worthwhile investigating how much green belt land is owned (either directly or indirectly) by developers and not by farmers or on which developers have options.

**(vii) *Distorting effects of publicised pressure-points***

The media have given prominence to green belt issues in areas of pressure, notably the south-east of England and the Edinburgh area. We believe that this has distorted public perceptions. Anti-green belt arguments relating to these exceptional areas have been generalised with an unfair and dangerous adverse effect on the image of green belts as a whole. It is important to rectify that image if, as we suppose, it is being harmfully distorted.

**(viii) *The planning system's seeming bias to favour developers***

Economic growth is important for Scotland, and developers make a crucial contribution to it. The Scottish Executive's *National Planning Framework for Scotland* (2004, para. 1) draws attention to the need for Scotland to be 'competitive, fair and sustainable' and later (paras. 93 onwards) stresses the importance of protecting and enhancing a high quality environment.

With regard to fairness, it may be noted that the planning system may have an unfair bias in favour of developers. The system responds to their planning applications, allows 'commercial confidentiality' to hold back proposals from communities until advertisement, grants developers the right of appeal which is denied to communities, permits modifications to plans both before and after granting of planning permission and allows developers the influence of planning gain. Large national and international commercial concerns have funding to employ experts at the design stage and lawyers on appeal. Local communities are relatively weak in face of this power.

In recent years joint public-private financial arrangements to fund public facilities have also increased the influence of commercial interests in planning. Further, the expanding size and impact of national and global corporations not only threatens smaller independent enterprises, but enables a degree of influence in planning and governance which requires counter-balances. Reports such as the New Economics Foundation's *Ghost Town Britain* have shown the potentially adverse effects on communities from global commercial giants. In green belt terms it is encouraging to see from the Scottish Executive's 2000 Retail Development survey that the tide of out-of-town supermarkets has been turned, but that is only part of the pressure on green belts and developers' advantages seem to continue.

Thus, there is a perception that the planning system has an unfair bias in favour of developers. Central government has put certain checks in place, some of which are also in the interests of environment and communities. Green belts are important among these checks on corporate influence. If commercial pressures emerge seeking to weaken green belts, those pressures would have to be assessed in terms of fairness as well as community involvement, high quality environment and the purposes for green belts listed in section A above.

**Cumulative effects**

From the foregoing, it can be seen that pressure on the green belt and on countryside is related to a self-perpetuating system often more geared to financial interests than to society's needs. The cumulative effect is serious and this must, presumably, be one of the central issues to be addressed in the new Scottish Planning Policy. We trust so.

## C. Three fundamental tensions

There appear to be three fundamental tensions in green belt planning : 1. Permanence versus adaptability, 2. Environmental protection versus economic growth, and 3. Present versus future. The three categories interact. Each will be considered.

### 1. ***Permanence versus adaptability***

There is tension between a sense of permanence for green belts and pressures to use green belt land for development, the latter often being described as 'adaptability' or 'flexibility' by one camp and 'intrusion' or '*ad hoc* expediency' by the other.

Green belts depend on their sense of continuity and stability for their success. If everyone knows that they are genuinely protected there will be little or no lobbying for breach or deliberate degradation of land in the hope of development. Hence Circular 24/1985's statement of 'the need to establish confidence in their permanence'. The English PPG 2 also refers to permanence.

A presumption of permanence requires clarity of purposes and a degree of sustained determination. However, as Elson (1993) has pointed out, permanence can be contentious and no system is immutable. In seeming contradiction to its own assertion of permanence, the Circular also refers to balance between containment and growth. Some sources suggest that circumstances can arise when flexibility is needed, but these should be exceptional. Once words like 'flexibility' and 'balance' get introduced they can be interpreted as signs of weakness. Rather green belts should be seen not as merely of structure plan duration but of extended-term duration. The presumption must be to resist development over an extended period. Creating (e.g. Perth Structure Plan) or enlarging (e.g. Inverclyde Local Plan) a green belt should, presumably, be made easy, but reducing it (e.g. Aberdeen in the eighties) or removing it (e.g. Dundee) might be subject to stringent review. The inadequately justified inclusion of proposed green belt breach (e.g. Argyll and Bute Consultative Draft Local Plan) is highly questionable. Also any attempt to modify a structure plan's green belt policy in order to fit in with a local plan would seem to be inappropriate.

If green belts are so valuable the issue of stronger guidance (or even requirement ?) should presumably have been integral to preparing the new SPP to fortify the sense of continuity and the protection of green belts.

If the sense of continuity of green belts is put in doubt, then the very basis of green belts could be lost. It is the *certainty* that planning applications in green belts will be turned down that makes for clear policy and straightforward application. It also prevents 'hope value', speculative purchase and deliberate degradation of green belt land.

Yet the concept of green belt certainty is in tension with pressures for settlements to expand. A distinction has to be made between genuine need on the one hand and speculation or mere convenience on the other. Pressures to erode the green belt were discussed in section B above and do not require repetition here. However, those defending the green belt principle do have to face the reality that in some cases there can be a genuine need for growth of settlements. While much can be achieved through in-town revival and non-green-belt release, there can be exceptional occasions when need requires further outward expansion. The twin issues of assessing need and finding alternative expansion solutions are discussed later in this paper.

One argument for incursion schemes is a view that green belts were not intended to be protected permanently from development. It is asserted that the public wrongly believe that

green belts are protected. The wording of Circular 24/1985 is ambiguous. On the one hand it refers to :

- “the need to establish confidence in their permanence”;
- development in green belts “should continue to be strictly controlled”;
- stability and endurance of green belt policies.

On the other hand there are phrases which could imply less solidity.

- Incorporation of appropriate control policies in development plans and define boundaries in local plans. This seems to imply relatively short-term time scale.
- Reference to a “balance between the containment and growth of urban development” and “taking a realistic view of all the locations where the demand can be met”. Both phrases can be interpreted in different ways.

As argued in section G below, there seems to be a need to clarify the Circular’s wording.

Four aspects seem clear to us. First, continuity and certainty (presumption of permanence) should remain at the heart of green belt policy. Secondly, the quality of planning authorities’ processes for reviewing their green belts with change in mind should be stringent and robust. (See section F below.) Thirdly, discussion of methods of breach of green belts (see Appendix 1 below) should not be mistaken for green belt models (see section E below). Finally, current calls to solve pressures in Edinburgh, the Lothians and Aberdeen should not determine the national approach to green belts.

## **2. *Environmental protection versus economic growth***

Many sources, including the National Planning Framework for Scotland (paras. 93-97), recognise the importance of environmental protection and the new system of Strategic Environmental Assessment will provide additional impetus. The outcomes from the recent SNH consultation on ‘*Scotland’s Future Landscapes – Encouraging a wider debate*’ may provide new perspectives. Landscape is about the relationship between people and their surroundings. It provides the setting for our day-to-day lives in both town and countryside. Several established purposes for green belts reflect the natural and environmental imperatives. Green belts would seem to be integral to these broad issues.

Economic growth is also an aim of the National Planning Framework for Scotland and is clearly important, but that does not necessarily mean expansion into green belts. Indeed, the Planning Framework states (para. 110) “Across Scotland there is already a plentiful supply of land for business and industrial development” and “The majority of business locations have already been identified”. Thus green belts should not normally be used for these functions.

If housing is part of economic growth, then the position is less clear-cut, and the Framework (para. 104) indicates that Edinburgh, the Lothians and Aberdeen have more difficulty in re-using urban derelict and brownfield sites than is the case in most of Scotland. Yet that does not automatically mean green belt incursion.

Thus, there is a fundamental tension. It may be convenient to expand into green belts, but to do so removes or diminishes the environmental value of land so designated.

The worrying trend of recent years has been a reported reduced respect for green belts by authorities and developers. Examples can be given from most of the areas represented by the joint authors of this paper. In a few cases well-justified need has been established with

resulting support from local organisations including green belt groups, but in others administrative convenience and developer or landowner wishes seem to have played a considerable part. The distorting effect of money – there can be gains for landowners, developers and authorities themselves – may have been a factor. However, the more that authorities get accustomed to salami-slicing green belts, the weaker is their defence next time.

Two new factors may assist : Strategic Environmental Assessment (SEA) applicable from July 2004 and the powers of the Scottish Information Commissioner from January 2005.

It is our understanding that in future no development plan can be approved without the full processes of SEA. These require that before a plan can be considered for adoption, a draft SEA Report must be made available as a public document and be subjected to public scrutiny. This SEA Report will set out the impact of the new development plan on the environment, and the onus will be on the planning authority (not the public as in the present system of planning inquiries) to demonstrate that any new plan will enhance environmental protection. To do this, the planning authority must maintain an environmental database from which the new plan must make forecasts of change, which are subject to subsequent monitoring. The environmental database has to be cleared for integrity with SNH and SEPA as statutory consultees, and the public will have a statutory role in the key stages of scoping and commenting on draft SEA findings.

The final SEA Report will have to demonstrate how public submissions have been taken on board and that alternatives have been considered. Reasons for rejection of alternatives must be given. The SEA Report must demonstrate that the SEA process has modified initial planning proposals in an environmentally-friendly manner, and set out proposals for monitoring the implementation of the new development plan in terms of impact on the environmental baseline.

The relevance of these changes to the question of green belts seems to be considerable.

Procedures will be enhanced by the role of the Scottish Information Commissioner who is requiring Scottish public authorities to publish their proposals for making public all non-exempt information they hold. These include planning information. The public will therefore have a right to have access to pertinent information – e.g. about green belts and proposals to modify them.

Within this setting, we consider that a message of a new SPP on green belts might be one of reaffirming the significance of green belts and cautioning against presumption of incursion for economic reasons.

### **3. Present versus future**

The National Planning Framework for Scotland (2004, para. 94) includes the aim to “pass well-managed, high quality landscapes on to future generations”. Green belts are long term. They are fundamental elements of strategic land use planning. Incursions into the greenbelt may sometimes be agreed with a long term perspective which considers heritage and future generations, but it would appear that short term expediency and immediate profits can often drive bids to develop in the green belt. This is especially a problem where planning authorities feel that they have inherited green belts which were entered into voluntarily by previous councils. There would seem to be a case for suggesting that the new SPP, taking a long view, might consider a greater impetus (even requirement ?) both to create and to maintain green belts for the sake of future generations as well as the present. We are guardians of land on behalf of those to come.

## D. Other green belt issues

We consider briefly below some issues commonly raised with regard to green belts.

1. *Protective value of green belts.* As section A above on purposes explained, green belts are protective. Sometimes they get described as 'negative'. The word 'negative' is emotive. The implication is that green belts prevent 'positive' things from happening. However, like the Ten Commandments, injunctions not to do harmful acts are socially positive. They protect what is valuable and vulnerable. This criticism of negativity is irrelevant rhetoric. The restraining effects of green belts are positive.

2. *Consistency.* It is sometimes asserted that green belts are inflexible. This is largely true and consistency – another word for inflexibility – is one of the virtues of green belts. By contrast, 'flexibility' represents a weakening of protection and sets precedents which can lead landowners to degrade land in the hope of profit and can encourage developers to acquire land speculatively and to press for further concessions.

3. *Variable quality of green belt land.* Attention has been drawn to the fact that some green belt land is of lesser landscape, agricultural or recreational worth than other parts. The implication is that less worthy green belt land should be released for development. The 'worthiness' of land is a subjective matter and open to a diversity of criteria for judgement. Attempting to downgrade some land by comparing it adversely with the 'best' sounds a bit like casting around for excuses to develop green belt land. The English PPG 2 (para. 1.4) on Green Belts takes the view that the prevention of urban sprawl and keeping land 'permanently open' are integral to green belts. It goes on to state (para. 1.7) that 'although Green Belts often contain areas of attractive landscape, the quality of landscape is not relevant to the inclusion of land within a Green Belt or to its continued protection.' We agree that the quality of landscape is not the only reason for green belts and that other purposes, including openness of countryside, need to be respected.

4. *Do 'strategic gaps', 'green wedges' and 'rural buffers' provide the same function as green belts without the inflexibility?* These three devices are useful, especially where there is no green belt. They may represent the last defence against communities merging, notably where there has been ribbon development, and could usefully be given the same status as green belts. Yet in many instances they are a second best because they are more limited in area and may not have the same protective force as green belts (according to how their status is set). Depending on their size, these gaps and buffers could also be surrounded by development and therefore lose the element of openness of countryside which PPG 2 takes as a prime objective. When people assert that these should replace some or all of a green belt, they may be putting forward short-term arguments to justify development in green belts rather than extended-term provision for future generations. Like other criticisms, they have the flavour of speculation and expediency in place of ethical standards – an attempt to simulate a sort of artificial moral high ground to justify self-interest.

For example, 'green wedges' (i.e. corridors of greenery running from the countryside into the centre of star-shaped towns) are worthy of protection if they already exist, as in Edinburgh, but are problematical if they do not. Green wedges are simply not possible for towns and cities which do not have them already, unless huge areas of buildings were to be demolished. The advocates of **new** 'green wedges' would appear to be seeking additional ribbon or radial development beyond current city boundaries with greenery between sections. If used, then over time this could result in a preponderance of radial urban forms (ribbon development). It seems that much greater clarity is needed about how these terms might be used safely.

5. *Can town fringes be improved without green belts?* See Appendix 2 below for a fuller discussion of town fringes, but here we need only note that although town fringes **can** be improved without green belts, the existence of green belts provides a protective element much stronger than mere exhortation. It seems that town fringe improvement is more likely to happen where there is a green belt. Started by the former Countryside Commission for Scotland, there is a history of urban fringe improvement schemes dating from the 1980s. Some of the most lasting are the Central Scotland Countryside Trust and the Edinburgh Green Belt Trust. These initiatives are now being taken forward by Greenspace for Communities, sponsored by SNH and Forward Scotland.

6. *Does extending the outer boundary of a green belt compensate for town fringe loss of green belt?* The answer must be 'No'. Surveys have shown that it is the inner margins of green belts where they meet settlement boundaries that are most sensitive and under greatest threat. These require especially robust protection. Additional areas of green belt attached to the periphery of green belts do not compensate for the loss of sensitive inner areas.

7. *Does settlement coalescence matter?* It has been proposed that avoidance of settlement coalescence is not a valid purpose for green belts because coalescence does not matter. This suggestion seems to us to be so obviously wrong that it should not be necessary to contest it. Yet it has appeared. It challenges one of the long-accepted reasons for green belts. The facts that, historically, conurbations have swallowed up smaller settlements and communities have merged do not justify trying to avoid that continuing. Further, retaining separation is a relatively easy policy to implement. People value a sense of place. Without it communities weaken and anonymous sprawl increases. Planning Advice Note 52 (1997) persuasively lists the value of small towns, their sense of community and identity, the importance of vital town centres and the threats of insensitive development. We consider that preventing coalescence, as advocated in Scottish Circular 24/1985 and the English PPG 2, remains essential.

8. *Are green belts relevant to small settlements?* Our answer is 'yes'. Some small towns only gain green belts by being 'washed' into round-city green belts as part of a conurbation totality – and that is, indeed, a valid reason. However the 22 purposes for green belts given in section A above could mostly apply to small as well as to large settlements. There is one reservation : this is that isolated small settlements are less likely to have extensive areas of former industrial degraded brownfield sites. Criteria for green belts around small towns such as St. Andrews would depend more on preserving the setting and special character of a historic town (see purpose E 12 in section A above) than on reuse of brownfield sites. Also, the proximity of nearby settlements with spare land capacity could lead two or more small towns to be embraced by one modest green belt. Thus, criteria might differ according to circumstances.

The Glasgow and the Clyde Valley Joint Structure Plan (2000, page 11) sees the green belt as being of particular importance to towns and villages.

9. *Loss of in-town green space versus loss of green belt land.* This dichotomy has been presented to us. It suggests that where growth has outpaced availability of brownfield sites, authorities must choose between sacrificing in-town green space or sacrificing some green belt. Clearly in-town open and green spaces and parklands are desirable. (See the Scottish Executive's Planning Advice Note PAN 65 *Planning and Open Space*, 2003.) However, this does not contradict the use of brownfield sites for development. We do not have sufficient evidence of specific circumstances to comment on the frequency with which the choice is really one of in-town green space versus green belt for development. However, if such circumstances are indeed claimed, it seems to us to strengthen arguments for thorough cross-town reviews with stringent criteria to be tested. (See section F below.)

10. *Beyond-green-belt sustainable satellites.* The traditional mode of expansion without incursion into green belts has been to develop beyond green belts, but linked by good public transport between settlements. ('Garden cities' etc.) That concept remains valid today. While Scotland's pressures are generally not as great as those of England's south-east, the concept could be relevant to a minority of stress points north of the border. There are questions about who should fund the infrastructure, but this imaginative approach deserves consideration.

11. *Width of green belts.* As a group we have not discussed this issue extensively, but there would seem to be a case for avoiding a prescriptive statement on width since it will differ according to purposes and local circumstances.

12. *Concentric rings of green belt.* More than one "belt" for a settlement is a theoretical possibility. It also raises the question of whether "belt" is the right term since irregular patterns exist. Further discussion of models of green belt appear in section E below.

13. *Can tax incentives and penalties be used to encourage non-green-belt sites to be used for development ?* We have not investigated that aspect extensively However, see section B(vi)(b) above with regard to VAT.

14. *Should there be stronger central guidance for authorities to introduce and maintain green belts ?* Planning matters are generally devolved to authorities and although the Scottish Executive provides policies, guidance and an appeals service, the extent to which it makes requirements is limited. However, consideration might be given to introducing obligations to have and to maintain green belts in certain circumstances.

The new SPP could be stronger than Circular 24/1985. It is our impression that a feature of recent years has been an increasing tendency for planners in some authorities to release green belt land, thereby undermining the concept. Unless rectified, it could be death of green belts by a thousand cuts. Our suggested formula – robustly protected green belts with occasional (e.g. no more frequently than 30 years) and exceptional (crisis) reviews – would provide both ethical protection and necessary long term flexibility.

15. *Farm diversification in green belts.* Diversification on farms is being encouraged. A particular problem arises if diversification which involves considerable built development is proposed for green belt land. The recent SPP '*Planning for Rural Development*' (2005, paragraph 10) states, "Green Belts will continue to presume against most new development and play a key role in maintaining the setting and separation of towns and cities. Any proposals to release land for development which is currently designated as green belt should be part of a longer term strategic settlement policy and set out in the development plan." Proximity of green belts to settlements may enable different, more "green" forms of diversification in green belts such as provision of fresh vegetables to nearby settlements and recreational opportunities for residents, as distinct from heavier forms of diversification in more remote areas. By such means, the integrity of green belts may be safeguarded. We consider that this aspect deserves further discussion.

16. *Is there an east-west divide in Scotland ?* In terms of population trends there does seem to be an east-west divide in Scotland, but with exceptions. Overall the Scottish population is declining. Yet in much of the east it is increasing, Dundee being an exception. In the west the population is falling dramatically, especially in the Clydeside conurbation. Dumfries & Galloway and East Renfrewshire are examples of exceptions.

Generally correlating with population rise is economic growth and pressure on green belts, while population decline is associated to some extent with brownfield sites and the need for strong green belts to ensure in-town revival.

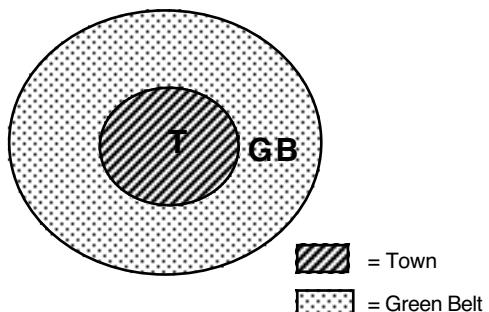
The danger is that a national system of green belts may be developed to meet east coast pressures which could be inappropriate in the west which has the highest proportion of green belt land.

17. *Equitable distribution of growth in Scotland.* One factor influencing the ways in which different parts of Scotland are dealing with green belts is that some are experiencing growth pressures while others are declining. This applies to both population and economic activity. In the Central Belt the two extremes are found within 40 miles of each other. A recent (June 2004) study based on the 2001 census data has identified Glasgow as the poorest area in the UK outside London.

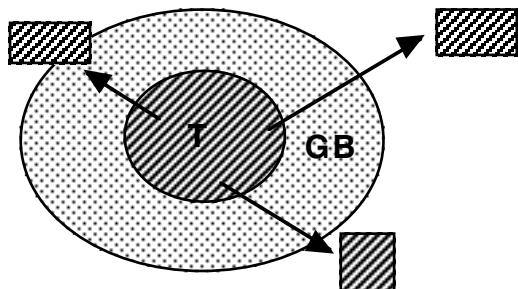
For a variety of reasons, and not just because of green belts, it would be desirable if there were a more equitable distribution of growth in Scotland. From the green belt perspective that could take pressure off the Edinburgh, Aberdeen and other stressed green belts and assist areas of decline. This is a policy matter beyond the scope of the present paper, but we feel that it still needs to be drawn to the attention of the Scottish Executive. In this respect, Scotland could lead the rest of the UK in pursuing a policy of more equitable distribution of growth.

## E. MODELS OF GREEN BELT

There may have been a tendency by some members of the public to think of green belts in simplistic terms. In part this has been a failure to appreciate the difference between designated green belt and other countryside or green space. In part it seems to have been an assumption that it must be a simple belt, as its name suggests. Yet refinements to that basic model are possible. This section considers some of those.



### The outward development model



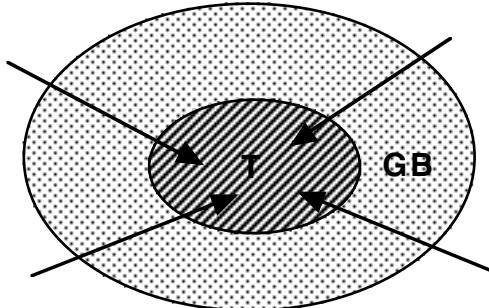
The outward development model accepts the need for growth but avoids urban sprawl by focusing on the planned growth of settlements beyond a green belt as well as through 'smart' planning in the central town. The settlements are ideally linked by public transport.

This meets all the purposes of green belts and is a common model. It also allows access into the green belt from all directions.

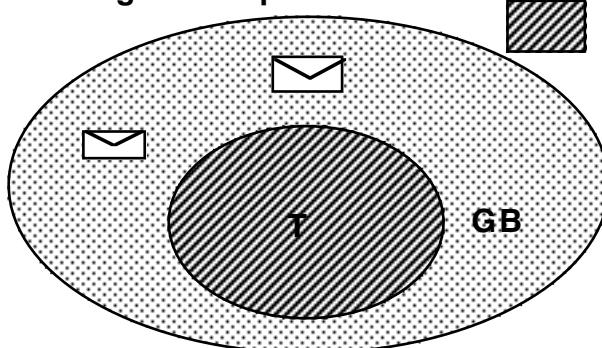
### The town revival model

The town revival model is used where there has been either economic or demographic shrinkage. New development is directed inwards to brownfield sites to assist in the town's recovery.

The function of the protected green belt is to encourage the regeneration of brownfield sites, but it fulfills the other purposes listed as well.



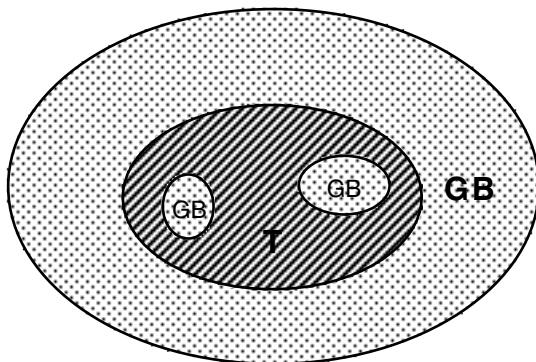
### The village envelope model



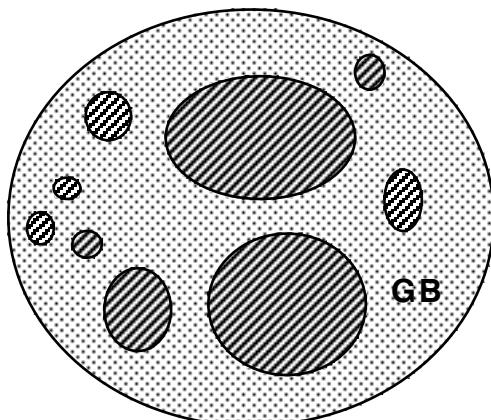
The village envelope model recognises that some villages may need to expand to remain viable and sustainable. Facilities which are population-related such as the village school, post office, shops or workplaces, may be lost without some modest expansion. These may be planned exceptions within the green belt, but ONLY if the villagers themselves want the expansion. It should not be regarded as an externally-imposed developer loophole to breach green belts.

### The in-town “green belts” model

Contrary to common assumption, it is possible to designate green areas within a town as “green belt” even though they do not encircle. This is especially valuable for protecting town settings, for recreation and for safeguarding valued green areas for future generations. Edinburgh and Glasgow offer examples of this model, although in Edinburgh’s case, the ‘island’ green belt is the remnant of a larger green wedge that has been lost to development.



### The multiple-settlement green belt model

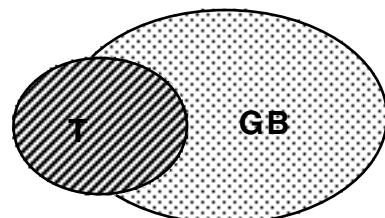


Here several settlements, potentially several authorities, are part of an embracing green belt. The most obvious Scottish example is that of greater Glasgow and the Clyde Valley comprising eight authorities. It has several advantages in circumstances of falling population. Each settlement, large or small, enjoys the benefits of green belt protection, as does the countryside. The benefits derived from this model, based on Landscape Planning techniques, can usefully cover large geographical areas e.g. the City Region.

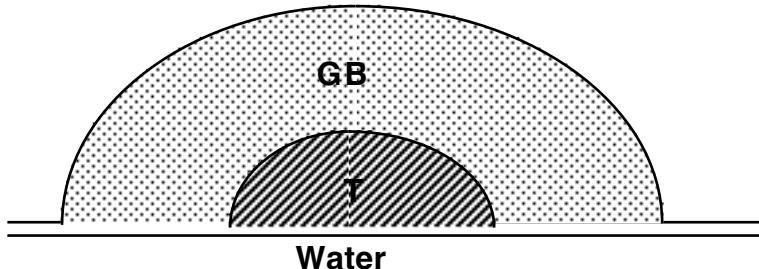
The model also inhibits the temptation for authorities to try to “poach” people from neighbouring authorities in order to increase population-related income.

### The partial green belt model

The partial green belt would be to protect a particular part of a town or countryside and to encourage development at other part(s).

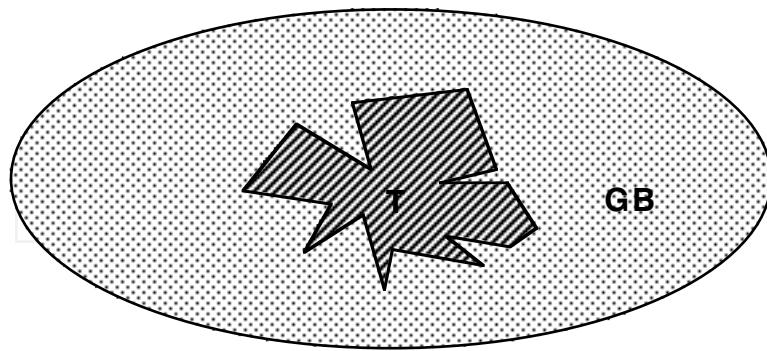


### Coastal green belt



Coastal (seaside or riverside) green belts are partial green belts determined by geography. There have been suggestions for “blue belts” to give planning protection relating to waterside, foreshore, beach, in-water and on-water areas.

### Green wedges protection model



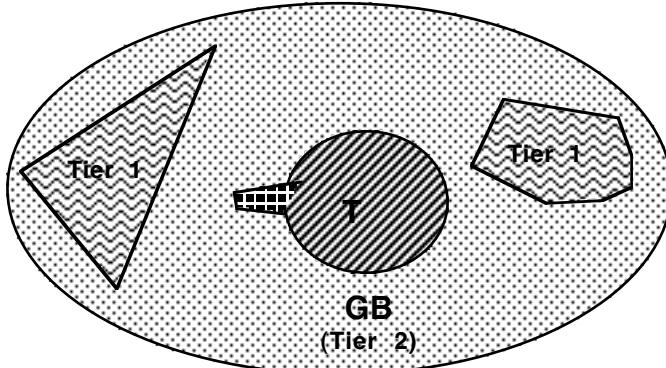
Where a town or city already has “wedges” of greenery running from countryside into the town, they can be preserved by designating them as part of the green belt.

Because the edges of the settlement are irregular, they provide maximum public access to the countryside, especially if a paths network is created. They also provide wildlife corridors.

This arrangement is logical and laudable. Its purpose is to protect existing green wedges. That is distinct from an incursion approach which introduces green wedges only by new development in a green belt with an irregular edge. (See Appendix 1 for an example.)

### Tier for growth model (3 tier)

-  = Town
-  = Tier 1 : key green belt  
(High heritage qualities and key areas to prevent coalescence of settlements)
-  = Tier 2 : standard green belt  
(Standard green belt robust protection)
-  = Tier 3 : tier for growth  
(Potential growth areas selected to minimise adverse impact upon green belts and their purposes)



The three tier green belt is a device to meet the situation where growth pressures have genuinely outstripped brownfield opportunities and land beyond the green belt or in village envelopes. In this circumstance a crisis review is needed. Such a review could assess population projections, urban land banks already held by developers, brownfield and ‘brown air’ sites, opportunities for re-siting in other settlements and all options other than green belt incursion. It could also employ a rural sequential test to assess if non-green-belt countryside options are available. If all other options are impossible, limited incursion into green belt land might be planned systematically with a view to protecting the best for future generations. (See appendix 1.)

Thus the first step would be to designate tier one land (especially prized green belt of national heritage standard as well as key areas to prevent coalescence between settlements) in conjunction with the Scottish Executive and / or its agencies, to ensure that tier three would not encroach on tier one.

Tier one would have a very strong protection against any development over a very long time scale. Tier two would be protected as robustly as any other green belt in Scotland with a fundamental presumption against development. By these means ‘hope value’ by developers would be eliminated. The Sandford Principle (see page 24) would also be deployed in tiers one and two. Tier three would be very limited and only designated after overarching review.

### **The Glasgow and Clyde Valley 3-tier model**

The Glasgow and Clyde Valley Joint Structure Plan 2000 (page 28) employs a three-tier approach with an encircling Green Belt involving eight authorities, an Inner Green Belt which includes sensitive wedges and Green Belt Structural Corridors which separate major parts of the conurbation. It is a matter of definition whether this is three-tier or sub-sets of a single green belt.

### **Other potential models**

Other models may emerge in time. It is possible that a long-term performance study of urban growth and urban shrinkage may identify other, perhaps more inclusive, models. These could respond to varying and individually different natural topographic, edaphic and economic factors (local resources of base and drift geology, skylines, watersheds, topsoil range, climate and locational advantage) as well as social changes (such as the increase in home-based electronic employment enabling more widely-located population into rural areas). However, there is a limit to the extent that a report such as this can cover such speculations.

## F. Reviews of green belts

It could be argued that if there is a presumption of permanence of green belts, then there should be few or no reviews of green belt boundaries by planning authorities since reviews imply impermanence.

On the other hand, periodic reviews by planning authorities are perhaps implicit in the development plan system and in Strategic Environmental Assessment (SEA – see section C 2 above). If reviewing green belts is to be part of the new City Region Plans (CRPs) and Local Development Plans (LDPs), they will presumably have different time scales.

To strike a constructive compromise between permanence and review, should green belt boundaries be reassessed routinely by authorities less often than CRPs and LDPs – for example every 30 years or more ?

There would seem to be two types of possible planning authority reviews of green belts :

1. Periodic, routine reviews.
2. Exceptional, crisis reviews.

Exceptional crisis reviews in effect occur every time an authority considers departure from its development plan and permits possible incursion into a green belt. Yet there are signs that such occasions are not necessarily preceded by thorough assessment of all options and facets, including long term impact. Thus, the nature of both types of review (periodic and exceptional) is presumably of crucial importance.

Availability of data from SEA processes should assist such planning authority reviews.

We have not yet been able to complete our consideration of this key aspect of green belts, but we feel that reviews of either type should be thorough in assessing :

- (i) genuine need (as distinct from convenience or developer pressure);
- (ii) population, housing and other projections;
- (iii) alternatives (e.g. audits of brownfield availability, developers' land-banks, other optional locations, countryside sequential assessments, etc.)

The questions which we have not answered include :

1. What should be the frequency of routine reviews (e.g. 30 years) ?
2. In what circumstance should exceptional reviews occur ?
3. Reviews triggered by whom and finally decided by whom ?
4. What data would be needed for reviews ?
5. Against which criteria should potential breach of a green belt be judged ?

We would welcome further discussion on these matters.

The central concern is to ensure thorough and stringent review before any incursion into the green belt. The 'Tier for growth' in the three-tier model outlined on page 17 above anticipates exceptional use of green belt land. Appendix 1 discusses some methods of doing this, but it is essential to stress that these methods should not be regarded as normal green belt practice. Approaches such as the two-tier or development corridor examples are ancillary to mainstream discussion of greenbelts in our view, though points of reference if review demands incursion.

## G. Is Circular 24/1985 out of date ?

Mere age is not a reason for replacing Circular 24/1985. We consider that justifications for revision lie in (a) need to revise and increase stated green belt purposes, (b) the need to rectify some lack of clarity in the Circular's wording, and (c) some changed circumstances in society.

### (a) *Revision of stated green belt purposes*

Purposes for Green Belts might be brought together more logically than is the case in Circular 24/1985 and a fuller list could be included, as outlined in Section A above.

### (b) *Some lack of clarity in the wording of Circular 24/1985*

- On the one hand the Circular calls for 'the need to establish confidence in their [green belts'] permanence' (para. 6) ; yet, on the other, it refers to a 'balance between containment and growth' and invites authorities to revise green belt policies in structure plans, thereby implying non-permanence. That seems contradictory.
- It does not seem clear whether or not green belts are expected for larger settlements experiencing pressures to expand. Section 4, item (ii) of the Annex states that for large towns and cities where there are strong development demands on adjacent lands, 'development should be very strictly controlled by green belt policies'. Does this mean that large towns currently without green belts are in breach of the Circular and that Dundee was defaulting when it abolished its green belt in 1980 ? Or does the requirement only apply if the authority has first opted to have a green belt ? We do not know. Section 4 of the Annex starts with the words 'Green belts have been established . . .' and that may limit the requirement to those already having belts. Also, section 6 of the main Circular refers to preserving 'existing designated green belts', though the last sentence alludes to establishing new green belts. More clarity seems to be needed.
- Section 7 states that authorities should review green belt policies and  
 'should relate the demand for all forms of development to a long term strategy for the structure plan area, taking a realistic view of all the locations where the demand can be met.'

In our view that is too vague to be useful. It can mean almost anything to anyone.

- The same section of the Circular continues :

'In undertaking such reviews authorities should seek to identify land on the inner boundaries of green belts and within settlements in green belts which is no longer making any significant contribution to the purposes for which the green belt in question was established . . .'

The word 'is' , in the singular, relates to the word 'land'. Is that in-settlement or green belt land ? The term 'on the boundaries of green belts' could mean either – though if it is on a boundary, it presumably has no area at all. We take it that the words 'within settlements' refer to avoidance of using green belt land for development, but, again, it does not seem clear.

At the least, there does seem to be some need to tidy up the wording of the Circular.

**(c) Some changed circumstances in society**

Since 1985 there have been some changes in society and new policy emphases which could affect green belts to a greater or lesser degree. The following is a preliminary list, though others could doubtless be added. These contribute to the argument for reassessing Circular 24/1985.

(i) *Imminent changes in the planning system*

*For example :*

- emphases in the National Planning Framework for Scotland
- new local development plans and city region plans
- issues raised in Scottish Executive's *Making Development Plans Deliver*
- need for Community Right of Appeal, reduction of applicants' right, etc.
- Strategic Environmental Assessment
- role of the Scottish Information Commissioner
- the White Paper *Modernising the Planning System*.

(ii) *Planning for Rural Development*

The Scottish Executive has published a new SPP on *Planning for Rural Development*. Its thrust is for 'selective modest growth' in the countryside, including settlements of 3,000 people or less. It recognises that differences in the way people earn their living between town and country are becoming less distinct (para. 12), that new communications technology and broadband enable more home-based employment and that the private car has increased ease of access. We add to these that some villages require more population if they are to retain facilities (see (iv) below). At the same time, the draft states (para. 10) that green belts will continue to restrict most new development. Thus, there is encouragement to develop beyond the green belt, but not in it.

(iii) *The electronic revolution in communications*

As long ago as 1970, Alvin Toffler's *Future Shock* predicted changes in employment patterns with more families working increasingly from 'electronic cottages'. It has been longer in coming than some expected, but it is a real trend today which is likely to accelerate. Thus out-of-town, beyond-green-belt living will become more practicable and planning should allow for this. Green Belts, of course, should be retained in this process.

(iv) *Villages within the green belt*

We raise the question of whether some controlled expansion of villages might have benefits of protecting the character and quality of those of less than 3,000 people, even if they are in green belts, by enabling schools, post offices, village shops, workplaces, petrol stations, etc. to be viable. The changed social circumstances in this case are the growth of urban supermarkets challenging village shops and closures of small primary schools, and so on. By retaining these facilities, the use of cars could be reduced with sustainable advantages. Thus modification of green belts, if needed, could be in villages rather than sprawl at the urban edges. However we are strongly of the view that such village expansion should only be with the express support of the residents of the villages in question and should not be imposed by authorities.

(v) *Sustainable development*

The sustainable development criterion has, rightly, come more to the fore in planning. The complexity of this issue is such that we provide a separate appendix (Appendix 3) to the topic. At this point we simply say that green belts contribute to sustainability much more than they hinder it.

(vi) *Falling population*

The issues of Scotland's falling population and its greater impact in the west than the east have been discussed earlier in this paper. A possible policy implication could be the use of green belts as a tool to curb unnecessary development in some places in order to encourage both economic and demographic growth in others. The potential for authorities increasingly to vie with each other to gain population in order to gain council revenue was also mentioned above. That can even apply to authorities which are currently experiencing pressures due to rising population : one argument applied in Aberdeen is that it wants more young people to pay for the elderly. But that applies throughout Scotland and has more serious consequences for areas of diminishing population. Incursion into green belts in order to give authorities unfair advantages would seem inappropriate. Rather, the argument for strong green belts is increased.

Where there is a declining population, the infrastructure still exists in terms of roads, services, schools, social facilities, shops and so on. In the case of new development in a green belt, this infrastructure will have to be created, which means that the taxpayer will meet additional costs. This is wasteful of resources, both capital and recurrent. It reduces sustainability.

(vii) *Town fringe countryside*

Appendix 2 to the present report discusses the growing movement to improve town fringe countryside which is now recognised as especially sensitive and at risk of degradation. It can be argued that there is a need to have in place strong green belt protection at town fringes, a view which appears to have superseded a somewhat contrary approach implied in paragraph 6 of the 1985 Circular.

(viii) *Other*

Other factors could be added and some of them have appeared earlier in this report. For example, questionable housing forecasts, the changing nature of authority housing, affordable housing, pressures for urban sprawl, peripheral shopping locations, the impact of transport infrastructure, creeping urbanisation through other forms of infrastructure. The list might be extended.

In our view these factors do justify the reconsideration of Circular 24/1985 and the strengthening of green belts.

## H. Some policy implications and possible ways forward for green belts

The purpose of this section is to raise some possibilities for the future of green belts and to offer some suggestions for the new Scottish Planning Policy (SPP). This section, like the rest of the paper, must be regarded as provisional since other points may be added in the future.

### 1. Confirm the value of Green Belts

The green belt principle has stood the test of time and essentially remains sound. We consider that this should be the starting point of future policy, rather than concerns about problems in exceptional cases.

### 2. Circular 24/1985

We agree that Circular 24/1985 could usefully be replaced by a Scottish Planning Policy (SPP) especially if the SPP is designed to arrest current rates of creeping green belt erosion, especially at its inner margins with settlements, and to encourage more and firmer green belts.

### 3. Emphasise the many purposes of Green Belts

There is a danger that green belts may be portrayed as having limited (and negative) purposes, whereas they are multi-functional. The protective elements are for positive reasons of conserving what are socially valuable and environmentally vulnerable. We suggest that the new SPP might include a fuller statement of purposes than appear in the 1985 Circular, as outlined in section A of this paper.

### 4. Purposes relate to circumstances

Some purposes will be applicable in particular locations and circumstances. Purposes and policies should be related to local needs and circumstances. We consider that it would be inappropriate to prescribe a one-model-suits-all approach in the new SPP, though some broad values of green belts apply across the country.

### 5. The Precautionary Principle

The precautionary principle could be adopted in the SPP. This is an element of sustainable development, which advocates restraints on development likely to cause damage to the environment in circumstances of significant complexity or uncertainty without waiting for scientific or other evidence of proof. This may be related to the Sandford principle which states that where conflict arises between environment and development, the natural and cultural heritage should be given greater weight.

### 6. Retaining a sense of continuity

A sense of certainty and continuity about green belts is needed and we hope that this will be a thrust of the new SPP. Without certainty and continuity, landowners, developers and planners may operate on the assumption that ultimately any green belt land is attainable for development.

While ‘permanence’ may be difficult to sustain for all sections of all green belts forever, it may be possible to achieve a presumption of permanence for green belt land in normal circumstances and to introduce a system of criterion-referenced reviews in either of two circumstances :

- (i) Periodic (say, every 30 years or more) review; or
- (ii) Crisis review, if crisis circumstances have been agreed by the Scottish Executive.

The following steps are suggested.

- (i) In the SPP, designate green belts as having the presumption of permanence.
- (ii) Take reconsideration of green belt boundaries out of development plans and make boundary review a distinct operation less frequently (e.g. every 30 years) or in circumstances agreed by the Scottish Executive to be a crisis.
- (iii) Introduce a system of criterion-referenced reviews.

**7. Criterion-referenced reviews** (See section F above.)

Reviews of green belts (either at periodic intervals or crisis reviews) should be carried out by a system of rigorous testing according to centrally-designated criteria by the Scottish Executive, in our view. We consider that green belt land should not be released unless there is incontrovertible evidence that development is genuinely needed, that alternative sites do not exist and that the long term benefits clearly override those provided by the green belt. We hope that the SPP may address the issue of reviews, perhaps reserving to the Scottish Executive decisions about triggering reviews and actions to follow reviews.

**8. Models of green belt should be fit for purpose(s)**

The green belt models offered in section E of this paper illustrate that a one-model-suits-all approach would be inappropriate. Models of green belt should be fit for purpose. For example, the Town Revival Model (page 16) might have wide application, especially in areas of decline, but the Tier for Growth Model (page 18) would be considered for areas experiencing extreme growth pressures and only after a crisis review.

**9. Incursion approaches should not be confused with green belt models**

Incursion approaches (Appendix 1 of this paper) are based on an assumption that breach of green belt will happen. Those approaches consider how to effect breach. That would only be applicable, to a limited degree after a crisis review. It is important that incursion approaches are not confused with green belt models (section E of this paper). It is also important that incursion approaches should not dominate the planning agenda. They should be seen as exceptions, not the main issue.

**10. Avoidance of coalescence of settlements is important**

It has been suggested that settlement coalescence does not matter. We strongly disagree. As indicated on pages 1,2 and 12 of this paper, we consider that avoidance of settlement coalescence is important and should be retained as a designated purpose of green belts.

**11. Green belts to provide countryside for recreation**

We consider that, with the advent of rights to countryside access through legislation, the argument for green belts to provide for recreation increases. Greater certainty of protection provided by green belts boosts the likelihood of paths creation and other recreational amenities and that this ties in with calls for healthier lifestyles. It has been suggested that green belts will do for the 21st century what public parks did for the 19th. As 'green tourism' and more vigorous outdoor pursuits become the norm, so ready access to the countryside takes on greater significance. Further, green belts help to keep the countryside closer to people. Urban sprawl drives it further away. The recreational purpose for green belts is greater than ever. We suggest that the new SPP might emphasise these issues.

**12. Green belts for institutional purposes**

This is discussed in item (i) of section B above. There is some vagueness in the Circular's wording and, although some essential public infrastructure may necessarily cut into the green belt (a new runway at an airport, a park-and-ride terminal, etc.) we do not consider that the need to provide a public facility necessarily justifies green belt use. More debate and clarity is needed on this issue, especially the definition of 'institutional purpose'. For example, it can be questioned whether university campuses, business parks, agricultural showgrounds are necessarily acceptable for green belt purposes since they often end up being similar in appearance to industrial estates.

**13. Green belts to maintain the landscape settings for towns.**

This has been a long-standing reason for green belts and it seems generally accepted.

**14. Green belts to safeguard natural heritage for future generations**

This reflects long term obligations and is part of the civic conscience argument. Once a piece of green belt land has gone for development, it has probably gone forever. This ties in with avoidance of urban sprawl, safeguarding countryside and protecting wildlife as well as improving the quality of town fringes, encouraging community and other woodlands and other rural benefits.

**15. Beyond-green-belt satellites**

This has been a traditional approach and still has validity, especially if there are good public transport links between settlements.

**16. Green belts as assets for sustainability**

There is discussion of this topic on page 3, and Appendix 3 is devoted to it. We suggest that green belts contribute considerably to sustainability.

**17. Town fringe areas of green belts especially in need of care**

Town fringe areas are especially sensitive and at risk. They deserve particular attention, care and management.

**18. Social justice, economic competitiveness and national policy for better balance of growth areas**

Green belts can be used as a tool towards the above aims. In theory, by controlling development in areas of growth it might be possible to attract it to areas of decline. Since this is in the arena of 'big politics' we feel that it is outside the remit of this paper and we therefore do no more than mention it. However, a national policy for distributing growth can be coupled with protection of the environment and seems to be a win-win situation.

**19. Green belts appropriate for small towns**

In the past, green belts have mostly (but not solely) been designated for large towns, cities and conurbations. A new emphasis might be given to green belts for small and medium sized towns. The experience of those 'washed into' conurbation green belts deserves attention. Our observation is that the effect has been positive for them and the green belt principle might be advocated for small and medium sized towns more overtly. We recognise that smaller towns may be less likely to have brownfield sites to develop, but the range of purposes for green belts suggests that other reasons justify green belts.

**20. More green belts**

It is heartening that new green belts are being created. The new SPP might give explicit encouragement to the creation of many more green belts. At present there seems to be inconsistency across Scotland and settlements which could benefit from green belts do not have them. It might be possible for the SPP to lead the way to more extensive use of green belts for towns of all sizes.

**21. Legal confirmation of green belts ? Other means of strengthening their status ?**

It is our observation (though we cannot substantiate it statistically) that recent years have witnessed an increase of incursions into green belts and a weakening of the preparedness by some authorities to regard green belts as protected over the long term. We stress that this observation is impressionistic and is limited to a few areas, but, if true, it could lead to a regrettable trend. Research into whether that has been the case would be interesting – e.g. an assessment of cases where approval ‘in very exceptional circumstances’ [Annex, para. 4(iii) of Circular 24/1985] was given. In any case, consideration might be given to whether it would be appropriate to accord legal status to Green Belts (*vide* the London Green Belt Act 1938) or some other mechanism to diminish the erosion of green belts. Perhaps that can be achieved through the SPP, but the issue of a degree of certainty (presumption of permanence) is crucial to the future of green belts.

**22. Imminent changes to the planning system**

Imminent changes to the planning system as outlined in G (c) (i) above seem to us to provide additional reasons to confirm, strengthen and increase green belts. The Scottish Executive’s *National Planning Framework for Scotland* (2004, para. 1) calls for Scotland to be ‘competitive, fair and sustainable’ and stresses (paras. 93 onwards) the importance of protecting and enhancing a high quality environment. It is our contention that green belts support these objectives.

**23. Green belt management and enhancement**

We consider that green belts should be more than designations for protection but should be accompanied by appropriate arrangements for countryside management to promote landscape enhancement and public access as well as farming, wildlife and other benefits.

**24. Taxation changes**

We raise the possibility that adjustments to the system of taxation, especially VAT (see section B(vi)(b) above) could be considered towards achieving some of the above benefits.

**25. Retention of the term ‘green belt’**

The term ‘green belt’ is well-established and widely known. In some quite minor respects it does not precisely describe the concept; for example a green belt does not necessarily encircle. However, any change could be confusing to the public and could be seen as an attempt to undermine green belts. We feel strongly that the term should be retained.

## APPENDIX 1

### REVIEW-BASED INCURSIONS INTO THE GREEN BELT : assessment of proposals

Periodically proposals are made for developments in green belts. These may include references to 'green wedges' formed by new developments; to a radial or development corridor approach; or to a "two-tier" approach with the worrying implication that the lower tier is less protected from development than the upper tier.

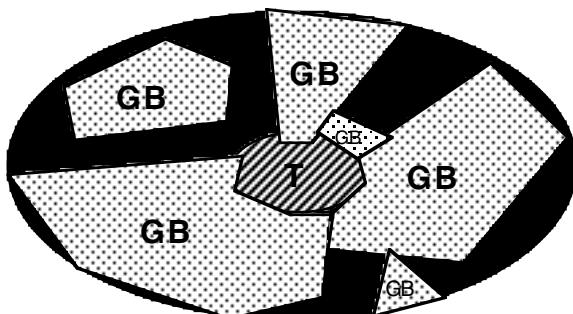
As explained in section C of our main paper, there is tension between incursion proposals and concepts of 'certainty' or 'long-term protection' of green belts. An element of stability is integral to the effectiveness of green belts. Once the system signals a 'maybe' message about the possibility of general development, the very basis of green belts has been weakened.

We consider that emphasis needs to be put on the exceptional nature of incursions into green belts, the importance of careful review before considering such a move and stringent criteria to be met in such a review. (See section F of our main paper.) In section E , on models of green belts, we included one which envisaged limited incursion – the "Tier for growth (3 tier) model". What follows are possible approaches in case of incursion, ***but we stress that these would be abnormal and only considered subject to review according to stringent criteria.***

Here we illustrate some of the incursion approaches which have been raised. All appear to have as their objective some development in the green belt and are therefore, in our view, in need of close scrutiny and clear criteria before approval. In each case **the use of black shading indicates incursion (i.e. developable) 'green belt'.**

#### Two-tier "Protect the best" proposal

- [] = Tier 1 : prized land to be protected
- [] = Tier 2 : "green belt" land less protected



This approach has caused us anxiety.

Fear of indiscriminate erosion of green belt over time may lead to identification of especially prized zones (Tier 1) which could be given stronger and more permanent protection, either by local authority designation or by national decision.

Tier 2 would still be green belt and attempts would be made to resist development in them , respecting green belt purposes and criteria.However, the underlying assumption would be that if incursion into a green belt is proven 'necessary', then Tier 2 green belt would be the first to go.

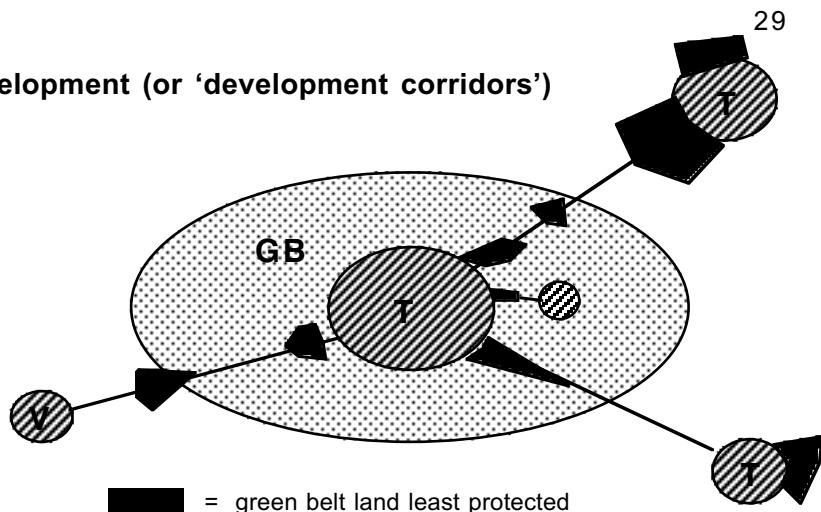
A further issue would be the relative sizes of the two tiers.

The main disadvantage is the message to developers that the lower tier of a green belt may be 'second class' and open for development bids in time. "Hope value" would increase as would pressures to build. Other disadvantages include incitement to create out-of-town shopping centres (with damaging effects to town centres), degradation of tier 2 land and likelihood of settlement coalescence.

### Route radial / ribbon development (or 'development corridors')

The logic of radial or ribbon development is that green belt erosion should follow transport routes between settlements to maximise use of public transport.

It is also argued that the gaps between radials would be green wedges which maximise public access to the countryside.



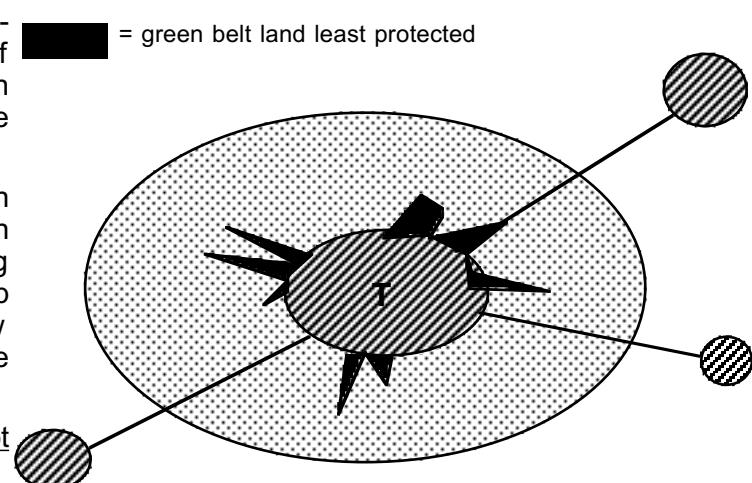
Apart from breach of other green belt purposes, this arrangement runs an increased danger of coalescence of settlements, with loss of sense of community. Routes to any given settlement would be substantially built-up and the sustainable advantages of compact towns would be diminished by spider sprawl. Another disadvantage is the temptation to allow out-of-town retail outlets, with consequent damage to town centres.

### Zig-zag town edge (claimed green wedges) development

The zig-zag town edge development proposal is a means of extending the town into the green belt in a way that recognises the value of green wedges.

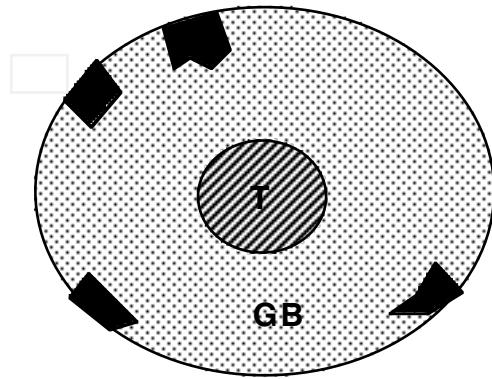
It is not the same as the Green Wedges Protection Model given on page 17 above since the zig-zag approach would involve giving up green belt land for new development. It gives a "green" tone to incursion into a green belt.

Such wedges may or may not follow the transportation lines to other settlements. The advantages of not following transportation lines are that new developments are less conspicuous from road or rail, diminish ribbon development and provide better wildlife corridors.



### Town edge protection approach

 = green belt land least protected



The town edge protection approach starts with the view that the section of green belt most in need of protection is that which is closest to the town boundary.

Constant “salami-slicing” of town fringe green belt is a common and insidious experience. It suits developers because town fringe land is more convenient to access, has services nearby and is easier to sell. However, it pushes the countryside ever further from people in the town, is urban sprawl and usually takes little heed of the effect on the town’s setting.

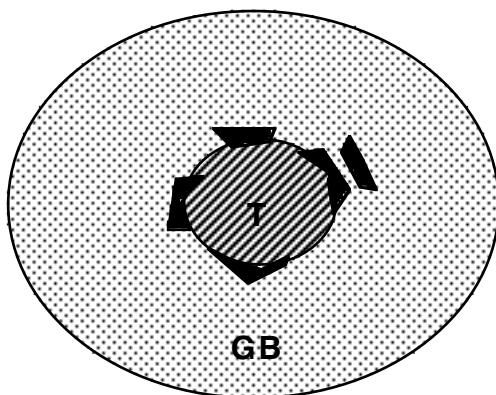
Town edge protection, by contrast, enables people to get into the countryside from either the town or from ‘satellite suburbs’ (Note : not satellite villages which require more infrastructure) and reduces urban sprawl.

There are disadvantages. In effect, the town edge protection approach is simply reducing the depth of the green belt from the outside and it may be argued that one might just as well leap-frog the green belt. However, the town edge protection approach is, arguably, better than salami-slicing the green belt from the town edge outwards. (See below.)

### Salami-slicing the green belt from the town edge outwards

This seems to be the commonest, yet least satisfactory method of incursion into the green belt. It constitutes authorised urban sprawl.

Because services are close by and because it permits opportunistic development, irrespective of appropriateness either for sustainability ends or for town setting, it is the often the method which delivers easiest returns for developers. Bypasses around built up areas act as distributor roads that open up areas on either side for development and contribute to these effects.



We do not advocate any of the above approaches as normal procedure. The incursion approaches are only applicable, in our opinion, if a thorough-going review has ruled out other options.

## APPENDIX 2

### TOWN FRINGE COUNTRYSIDE

New interest in the quality of town fringe countryside – with or without green belts – is increasing. In part this seems to be a response to the despoiling of agricultural land at the sensitive point where town meets countryside. As a Times correspondent (17.3.03) put it, 'Farmers on the edge of suburbia suffer from vandalism, abandoned vehicles, fly tipping and attacks on animals from an urban culture that does not understand a different way of life.' But degradation is not just caused by urban vandals; sometimes it is tempting for landowners themselves to degrade land in the hope of planning permission.

The town fringe countryside movement is exhortatory. It is mostly geared to non-green belt town fringes where landowners are more likely to allow degradation to advance their case for development. Control could be more effective in a strong green belt setting where landowners and developers know that development is out of the question.

The recent (2004) Rural Urban Fringe Consultation by the Countryside Agency and Groundwork UK has proposed ten 'key functions', which are concepts of how the rural urban fringe can be viewed and used. The following is an abbreviated summary :

- **A Bridge to the Country.** Includes access, paths, waterways, community woodlands, country parks, etc. Emphasis on car-free routes.
- **A Gateway to the Town** Includes setting for the town, quality entry-points "managed and maintained to a high standard", especially major routes.
- **A Health Centre** sport, recreation, etc.
- **A Classroom** Learning opportunities, especially for the young.
- X **A Recycling Centre** Includes sustainable processing of waste, management of water resources, pollution control. Woodland screening.
- X **A Power Plant** Clean energy production. (Solar, biomass, wind.)
- **A Productive Landscape** Farming – but especially farming to provide fresh produce for the local town. (Farmers' Markets, lower transport costs, etc.)
- X **A Place to Live Sustainably** When building in the countryside, good design, enhance rural setting, use sustainable techniques, balanced communities, etc.
- **An Engine for Regeneration.** Essentially about sense of community and reducing anti-social behaviour. (Community gardens, allotments, encouraging people to use the fringe.)
- **A Nature Reserve** Wildlife protection.

The overlap with some green belt purposes is clear, though some (those marked with 'X') would require an adapted approach in a green belt. Generally, however, these functions would be easier to achieve when there is a green belt.

It seems important that town fringe green belts should be recognised as especially valuable and therefore in need of protection and management, particularly since they are also the parts of green belts most at risk. The more that the inner edges of green belts get 'salami-sliced' the further green belts recede from the majority of the population.

## APPENDIX 3

### GREEN BELTS AND SUSTAINABLE DEVELOPMENT

Green Belts foster sustainability. We summarise several reasons below, but two concepts shared by green belts and sustainable development are fundamental.

- Both look to the welfare of future generations as well as the present.
- Both put long-term benefit for the many above short-term gain for the few.

In some instances 'sustainability' and 'development' seem to be opposites. Yet welding the two into a coherent philosophy embracing environmental, social and economic elements has been achieved, even though definition is difficult and factors are complex. The Brundtland Commission definition of sustainable development ('development that meets the needs of the present without compromising the ability of future generations to meet their own needs') helps, but each setting or circumstance requires its own list of practical actions or prohibition of actions.

Since green belts are more concerned with refraining, for the good of society, from built development, the emphasis must especially be placed on the sustainability element of the term. However, 'development' can refer to such actions as agriculture, forestry, fishing, pest control, outdoor recreation facilities, access to the countryside and other 'green' functions so that it would be wrong to suggest that green belts are anti-development.

Also, the World Bank's distinction between development (bring to a better state) and growth (increase in size) is important. Calls for crude economic or built growth may be non-sustainable, but development in the sense of demonstrable qualitative improvement – sometimes including a controlled but compensated element of growth – without erosion of non-renewables could be the most sustainable way of viewing development.

The excellent SNH paper *Sustainable Development and the Natural Heritage* (1993) covers many of the concepts which we recognise though we do not repeat them all here. Its definition of environmental sustainability – the need to use our natural resources wisely and without compromising the inheritance of the future – must surely apply to green belts.

It also recognises (para. 2.4) that sustainable development is interpreted differently by various protagonists. To take a current example, developers support their claims to build in green belts with the argument that leap-frogging the green belt means more use of cars. However, car use is only one of many facets and it is by no means established that urban sprawl reduces car use compared with local facilities in multiple smaller settlements. Yet the assertion illustrates the way in which all protagonists seek to claim that their interests are somehow compatible with sustainable development.

SNH has offered five main guidelines. Two of these are of special relevance to green belts :

- that the quality of the natural heritage as a whole should be maintained and improved;
- that in situations of great complexity or uncertainty we should act in a precautionary manner.

The precautionary principle advanced by SNH is especially important to green belts. If in doubt, don't build. Once a proposal to erode a green belt appears, the issue immediately becomes complex and controversial. The positive other side of the coin is that a firmly enforced green belt policy is simple to create as a policy, is robust and easy to enforce, secures objectives over the longer term and is popular. Retention of green belts is itself a precautionary step.

There can be little doubt that green belts, being the countryside facility closest to the largest concentrations of people, must be high on the list of our most important natural heritage. Once part of a green belt has gone, it has gone forever.

Sustainable development is an overarching concept applied to anything, not just to physical planning. It may be argued that it is already integral to green belts and that the worrying problem is the way in which attempts are being made to introduce non-sustainable actions in green belts.

The Scottish Planning Policy number one (SPP 1, paras 6-7, page 3) states 'The Scottish Executive is committed to integrating the principles of sustainable development in its policy agenda.' It lists eight aspects to which planners should have regard :

- promoting regeneration and the full and appropriate use of land, buildings and infrastructure;
- promoting the use of previously developed land and minimising greenfield development;
- conserving important historic and cultural assets;
- protecting and enhancing areas for recreation and natural heritage;
- supporting better access by foot, cycle and public transport as well as by car;
- encouraging energy efficiency through the layout and design of development;
- considering the lifecycle of development from the outset; and
- encouraging prudent use of natural resources.

The relevance of green belts to the above list is self-evident.

Some organisations have developed practical check-lists to assess sustainability. As Friends of the Earth argue in their booklet on environmental justice, 'all national and local policies should be assessed against a sustainability checklist (which already exist in some Local Authorities).' Such checklists are a valuable way forward. They tend to be quite long and complex. (See for example the 52-point North Lanarkshire checklist or the 43-pages of guidelines in the Friends of the Earth's booklet *Community Sustainability Audits*, 2002.) We do not repeat them here, but it is clear that green belts meet many of the criteria listed. Such checklists are more concerned with testing proposed developments than testing whether protection of environmentally-valuable areas should be overriding. The environmental case for green belts is self-evidently strong without tests designed for more borderline circumstances.

However, we draw attention to the fact that sustainable development applied to green belts is not just a question of the more obvious environmental and heritage benefits, but includes social and

economic advantages as well.

Green belts are socially valuable. The term 'the lungs of a settlement' implies the health advantages of countryside access. Green belts, by being close to main concentrations of population, afford health facilities for many and the new access legislation and the *Paths for Health* movement increasingly assist popular use of green belts for recreation and exercise. The more that green belts are eroded, the more people will use cars to get to more distant countryside. Also, where there is development on either side of a green belt, so people can access them from both directions. As concern about Scotland's bad health record mounts, so the social value of green belts becomes more significant. But the social value concerns more than just health. By providing a setting for settlements, green belts can enhance the overall quality of a town. By forcing attention of developers to the use of degraded and brownfield in-town sites they help to improve life in town as well as outside. Finally, green belts assist social inclusion; access is free for everyone without fees and if countryside, through green belts, is close to settlements, then it is available to those who cannot afford cars.

Green belts are economically valuable. Reference has been made above to forestry, agriculture, fishing, etc., but, being near to large numbers of consumers, the green belt can also become a source of local fresh produce as consumers increasingly value quality in their food. Use of fresh, locally-sourced food (e.g. by the NHS) is a theme which the UK Sustainable Development Commission has highlighted.

Tourism makes a major contribution to Scotland's economy (£4.2 billion a year and 10% of Scotland's workforce : see The National Planning framework for Scotland, 2004, para. 26) and landscape is a key aspect of tourism attractiveness. We damage it at our peril. Additionally, enterprises which bring wealth to Scotland value scenic settings to attract and retain staff. As the Glasgow and Clyde Valley joint structure plan (2000, page 13) states with regard to the Green Network, including the Green Belt, 'the quality of the environment also plays an increasingly significant role in the choice of location by business investors and industrialists.'

In its report *Shows promise. But must try harder*, (2004) the UK Sustainable Development Commission criticised the record of the Government on sustainability issues and offered twenty challenges for the future. Yet green belts represent an already-accepted sustainable policy. It would be relatively easy for the government to demonstrate one aspect of its sustainability credentials by confirming and extending green belts.

Reference has been made elsewhere in this paper to Strategic Environmental Assessment (SEA) and the link to sustainable development is obvious. The two together greatly increase the case for creating, strengthening and enhancing green belts. We may hope that the new SPP on green belts will give them new status and the impetus for creating many more.

**NOTE :** see the bibliography at the end of this report for some sources consulted concerning sustainable development and Strategic Environmental Assessment.

## APPENDIX 4

### **OBSERVATIONS ON ASPECTS OF THE HERIOT-WATT UNIVERSITY REPORT**

***Review Of Green Belt Policy In Scotland, Scottish Executive, 2004***

We start with praise. There is much useful information in the Heriot-Watt University report's literature search on green belts, its review of development plans and its four area case studies of (i) Aberdeen and Aberdeenshire, (ii) Dundee and Angus, (iii) Edinburgh and Midlothian and (iv) aspects of Glasgow and the Clyde Valley. It considers several concepts such as urban form, transport corridors, green buffers and wedges, and land management. Some of the conclusions are welcomed by the SGBA such as the value of green belts, their long term importance and the need to enhance them.

It raised the possibility of three policy options: scrapping green belts, incremental improvements and a two-tier system. In a press release of 11.8.04 (see Appendix 5 following) the Scottish Executive rejected scrapping green belts, gave its belief that a two-tier system is not necessarily the best way forward since 'that is potentially confusing and could undermine the protection that some green belt areas enjoy'. We agree, as advocacy of a two-tier approach to green belts suggests a 'one-size-fits-all' policy that would be inappropriate.

The Heriot-Watt researchers stated that 'tight time and resource constraints' limited their work on 'key issues'. We sympathise with their dilemma and give them credit for indicating openly that their report was restricted. The researchers also state that the range of interviews with 'key national stakeholders' (para. 1.30) focused on policy-makers, developers and planning professionals, thereby seeming to give less attention to other important social, environmental and local stakeholders. In approaching a new SPP it could be important to fill the gaps.

We note that the report tends to concentrate on metropolitan aspects, to the relative neglect of rural and town facets. The SGBA considers that conceptual, ethical and practical aspects pertaining to the countryside (after all, green belts are countryside) and smaller towns need to be given greater emphasis, as well as refinement of more overarching approaches.

Those interested are urged to read the Heriot-Watt report and we do not summarise it here, but below we touch on some matters which cause us concern.

1. In our view, the Heriot-Watt study does not offer a sufficient Scottish overview of green belts, but is essentially a case study report of four areas, predominantly in the east where problems are different from the west. (The pressures in Edinburgh and Aberdeen are untypical.) Other green belts and their effectiveness are largely omitted or only referred to briefly. There is no map of all Scottish green belts either existing or proposed.
2. Although some emphasis is put on one green belt that was abolished (Dundee), there is no counterbalancing assessment of those which are proposed (Perth, Stirling, St. Andrews).
3. The value of green belts for small and medium sized towns is not adequately covered in our view.
4. Community, rural and green belt organisations seem not to have featured markedly in the interviews or data-gathering and this perhaps accounts for what we consider to be insufficient coverage of issues such as countryside benefits, sustainability, the SEA arrangements, wildlife, landscape, tourism and concern for future generations.

5. The overarching ethical and practical functions of green belts to check inappropriate short term developments and to require careful review prior to any proposed incursion might have been given more prominence in our assessment.

6. Bearing in mind that this was intended as a policy review, we consider that Circular 24/1985 (which is the basis of current policy) might have been afforded fuller analysis, both of its strengths and its shortcomings.

7. Successes of green belts (e.g. in ensuring use of brownfield and other degraded urban land) get mentioned, but appear not to emerge as predominant themes.

8. While alternative approaches are properly considered (e.g. in the report's international section) we feel that there is inadequate assessment of how those places which do not have green belts might benefit by their introduction.

9. Financial interests of both developers and authorities are clearly important factors, but there seem to us to be insufficient data about these influences or discussion of how taxation changes could reduce pressures on green belts and assist beneficial developments.

10. The SGBA is especially concerned at the wording of paragraph 7.2 on page 93 of the Heriot-Watt report. This is the start of the chapter summarising the researchers' assessment of policy options and, from its prominence, it appears to be a key theme adopted by the researchers. It states:

‘... that Green Belt should be seen as having an overarching function, as a tool for managing the long term growth of metropolitan areas.’

Not only are words like ‘managing’ and ‘growth’ somewhat imprecise, but interpreted in certain ways, we worry that the statement could be used to undermine green belts. Further, green belts are relevant to small and medium sized towns and countryside. They are not just a metropolitan feature. But most importantly, although the long term growth of urban areas is one valid aspect of the green belt issue, it is only one of several which might be described as ‘overarching’.

The report suggests that all those who attended the policy workshop held on the report would accept the view quoted above. A few of us attended that workshop and we certainly do not accept the assertion in its present form and we are unhappy at the implication that we would accept it. The SGBA organisations consider that this statement should not be included in the SPP unless the wording is modified and clarified to bring it in tune with other green belt purposes and described as only one of several overarching concepts.

The Alliance recognises that Circular 24/1985 has deficiencies, that circumstances have changed, that purposes for green belts have increased and that there are current pressures in specific areas such as Edinburgh and Aberdeen. It is appropriate to reassess the Circular at this stage and to create a new SPP. However, we feel that, useful though the Heriot-Watt report is in some ways, it did not fully meet the needs of preparing for the new SPP. More research is needed. In the meantime, we hope that the SGBA report has gone some way to filling some of the gaps.

## APPENDIX 5

### SCOTTISH EXECUTIVE PRESS RELEASE 11.8.04 AND MINISTER'S STATEMENT

Green belts to be reviewed

11/8/04

A new Scottish Planning Policy (SPP) on green belts is to be prepared, following research showing both a high degree of support for green belts and a need to strengthen and clarify the policy.

The Executive will now begin the process of preparing the new SPP, supported by a Task Group and involving consultation with a wide range of stakeholders. A draft SPP is expected in spring 2005.

Communities Minister Margaret Curran said:

*"Green Belts have played an important role in shaping Scotland's cities and towns over the last 50 years.*

*"However, since policy was last reviewed in 1985, there have been many changes in development pressures and how green belts are used.*

*"They may serve a wider range of purposes than originally envisaged, with increasing interest in issues such as urban regeneration and sustainable transport.*

*"That's why we commissioned research to look at whether green belts are still the best tool to use. The study suggested three options: scrapping green belts, creating a two-tier system of 'permanent' and 'fixed term' green belts, or looking at improvements to the existing system.*

*"Following this, we strongly believe scrapping them would not be appropriate - they still have a key part to play in the management of urban change.*

*"Nor do we believe that a two-tier system is necessarily the best way forward - that is potentially confusing and could undermine the protection that some green belt areas currently enjoy.*

*"But there is a real need to refresh green belt policy, and over the coming months we will take forward discussions on how we can strengthen our green belts so that they continue to play a key role in supporting our aspirations for healthy and vibrant cities, towns and countryside and protecting valued green space."*

Findings from the research include:

- Green belts are perceived as important by the public and found valuable by planners in shaping and managing urban growth, but there are clearly differences of understanding of the role of green belts by different groups and across different parts of the country.
- Green belts are widely seen as a long term, even permanent, form of protection from development, but the reality in Scotland is that they have had much re-designation and development.
- Green belts should be seen as a tool of long-term planning, not just as a 'land bank' to meet future housing needs, as some local authorities appear to view them
- There is a general expectation that today's green belts will involve environmental and recreational improvements such as parks or cycle paths, but this needs to be better managed in practice.
- Concerns regarding 'leap-frogging' of green belts have resulted in increasing diversity in the shape of belts with green buffers, wedges or networks being viewed more favourably.
- There is little hard evidence that green belts contribute to town 'cramming', squeezing out urban green space or suburban housing.

The research was based on a research project carried out for the Scottish Executive by a team from Heriot-Watt University and Robinson Associates.

## BIBLIOGRAPHY

*The following are some of the sources which were consulted in preparing this paper.*

- Agyeman, J. (2000) *Environmental justice – from the margins to the mainstream ?*, Town & Country Planning, November 2000.
- Birley, T. (2001) *Reality Check : A review of Scottish Executive activity on sustainable development*, WWF Scotland
- Countryside Agency and Groundwork (2004) *Unlocking the potential of the rural urban fringe : a consultation*.
- David Tyldesley and Associates (2003) *Environmental Assessment of Development Plans*, Scottish Executive Development Department.
- Department for Environment, Food and Rural Affairs (2004) *Taking it On : developing UK sustainable development strategy together*
- Dundee City Council and Angus Council (2002) Structure Plan 2001-2016 *Joining the Links*, and other Council documents related to Dundee and Angus.
- Elson, M., Walker, S and Macdonald, R. (1993) *The Effectiveness of Green Belts*, Department of the Environment, HMSO, London.
- Elson, M. (2002) *Modernising green belts – some recent contributions*, Town & Country Planning, October 2002.
- Esson, G., Reekies, B. and Jackson, T. (2004) ‘Objective-led’ strategic environmental assessment in practice in a Scottish local authority : sustainability appraisal of the Perth and Kinross structure plan, European Environment, 14.
- Friends of the Earth (2002) *Community Sustainability Audits*.
- General Register Office for Scotland (2003) *Scotland’s Census 2001 : Key Statistics for Settlements and Localities Scotland*.
- General Register Office for Scotland (2003) *Scotland’s Population 2002*.
- Inverclyde Council (2002) *Inverclyde Local Plan Final Draft*.
- Joint authorities (2000) *Glasgow and the Clyde Valley Joint Structure Plan*.
- Levinthal, T. (1994) *The Edinburgh Green Belt*, Cockburn Association. Newsletter number 38.
- Llewelyn-Davies (1998) *Green Belts : Frames or Fragments ? A Study of the Edinburgh Green Belt*, Report for the Association for the Protection of Rural Scotland, APRS.
- New Economics Foundation (2002) *Ghost Town Britain*.
- North Lanarkshire Council, Department of Planning and Environment, *Sustainability Checklist*.
- Office of the Deputy Prime Minister (2004) *A Draft Practical Guide to the Strategic Environmental Assessment Directive*.
- Office of the Deputy Prime Minister (2001) *Planning Policy Guidance 2 : Green belts*

- Royal Town Planning Institute (2002) *Modernising Green Belts : A discussion paper.*
- Scottish Development Department (1985) Circular 24/1985 *Development in the Countryside and Green Belts.*
- Scottish Development Department (2004) National Planning Framework for Scotland.
- Scottish Executive Development Department (2002) *Scottish Planning Policy 1 : The Planning System.*
- Scottish Executive Development Department (2003 & 2004) *Retail Development Surveys for 2000, 2001 & 2002.*
- Scottish Executive Development Department (2004) 1998 - 2002 Retail Developments 5-year Trend Analysis
- Scottish Executive Development Department (2004) *Scottish Planning Policy : Planning for Rural Development (Consultation Draft)*
- Scottish Executive Development Department (2004) *Review of Green Belt Policy in Scotland* (authors: G. Bramley, C. Hague, K. Kirk, A. Prior, J. Raemaekers and H. Smith all of Heriot-Watt University, and A. Robinson and R. Bushnell, both of Robinson Associates)
- Scottish Executive Environment Group (2004) *Strategic Environmental Assessment : A Consultation on the Proposed Environmental Assessment (Scotland) Bill.*
- Scottish Executive, City of Edinburgh Council and Scottish Enterprise Edinburgh and Lothian (2003) *West Edinburgh Planning Framework*
- Scottish Natural Heritage (1993) *Sustainable Development and the Natural Heritage.*
- Scottish Natural Heritage (2003) *Scotland's Future Landscapes ? Encouraging a wider debate.*
- Scottish Office (1999) *Down to Earth : a Scottish perspective on sustainable development.*
- Scottish Office (1997) *Planning in Small Towns*, Planning Advice Note 52.
- Sustainable Development Commission (2004) *Shows promise. But must try harder : An assessment by the SDC of the Government's reported progress on sustainable development over the past five years.*
- Which ? (1989) *The Green Belt*, August 1989.