

**Issue No: 13**

**Issue: Green Belt**

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### **Supporting document**

1. Scottish Planning Policy, Scottish Government, 2010 (extract) page 32 section 159 to 164

<b>Issue 13</b>	<b>Green Belt</b>	
<b>Development plan reference:</b>	Spatial Development Framework 2: Environmental Action	<b>Reporter:</b>
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>E6 Quarriers  E13/3 sportscotland  E23 Scottish Property Federation  E42/1 Lynch Homes  E45/1 CALA Homes (West)  E51/2 Scottish Government (Directorate for the Built Environment)  E52/10 Mactaggart and Mickel (Homes) Ltd.  E55/3 Homes for Scotland</p>		
<b>Provision of the development plan to which the issue relates:</b>	Glasgow and the Clyde Valley Green Belt (page 34 paragraph 4.48 and Strategy Support Measure 8)	
<b>Planning authority's summary of the representation(s):</b>		
<p><b>E6 Quarriers</b>  The Proposed Plan should provide a strategic policy position that would allow limited incursions into the green belt to meet shortfall for delivery of affordable housing.</p> <p><b>E13/3 sportscotland</b>  Page 34, paragraph 4.48, bullet 4 would be improved by ensuring the wording used corresponds with that outlined in the Scottish Planning Policy. The organisation is keen to avoid any ambiguity over the purpose of the green belt as it relates to outdoor sport and recreation and want to ensure the Strategic Development Plan is clear on the role of the green belt in this respect.</p> <p><b>E23 Scottish Property Federation</b>  Whilst the importance of the Green Network Strategy is recognised, the respondent does not agree with the proposed green belt designation.</p> <p><b>E42/1 Lynch Homes, E45/1 CALA Homes (West)</b>  The Glasgow and the Clyde Valley Strategic Development Planning Authority does not provide any view or opinion on the need for a green belt boundary review as envisaged in Scottish Planning Policy within the region (Scottish Planning Policy on green belts (paragraphs 159 to 164)). The Proposed Plan needs to set the policy direction for green belt boundary review.</p> <p><b>E51/2 Scottish Government (Directorate for the Built Environment)</b>  Paragraph 161 of Scottish Planning Policy requires Strategic Development Plans to establish the need for a green belt, identify its broad area and set the policy for future development within it. This material is missing from the Proposed Plan. The principal concern is over clarifying the spatial extent of the green belt and the extent of the green belt is not clearly displayed in the maps or in text, beyond the</p>		

statement that the green belt should continue to be designated. Some consistency of approach needs to be imposed by the Glasgow and the Clyde Valley Strategic Development Planning Authority to sufficiently ensure that the strategic aims of this designation are achieved.

**E52/10 Mactaggart and Mickel (Homes) Ltd.**

It is considered that a strategic review of the green belt boundaries should have been undertaken, setting out future key aims and purposes and that a specific Strategy Support Measure then should have required each Local Development Plan on a consistent basis to review their greenbelt boundaries within the findings of the future key aims and purposes of the green belt as a planning policy.

**E55/3 Homes for Scotland**

The Glasgow and the Clyde Valley Strategic Development Planning Authority should recognise the wider land-use planning objectives of green belts and it should clearly direct a review of boundaries through Local Development Plans to ensure that all development requirements can be accommodated.

**Modifications sought by those submitting representations:**

**E6 Quarriers**

The green belt should be reviewed within the city region to ensure that sufficient land exists to support the sustainable growth of rural communities.

**E13/3 sportscotland**

Page 34, paragraph 4, bullet 4 amended to read:

“Protecting and giving access to open space, and providing for a range of opportunities for outdoor recreation compatible with an agricultural or natural setting.”

**E23 Scottish Property Federation**

If the Glasgow and the Clyde Valley Strategic Development Planning Authority continues with the green belt designation, suggest that both it and the Green Network Strategy are regularly reviewed and non-conforming sites removed.

**E42/1 Lynch Homes, E45/1 CALA Homes (West)**

Paragraph 4.45 add the following text:

“Although there are extensive areas of brownfield land across the region, there will be many instances where greenfield land release is a legitimate response to meet the requirements of the strategic development strategy.

In particular, it is recognised that the Green Belt’s inner boundary across the region is too tightly drawn against the existing urban edge and follows ill-defined physical features on the ground.

Consequently, the opportunity should be undertaken to review Green Belt boundaries through the local development plan process to meet the requirements set out in SPP as well as to release land for future development to meet both strategic and local development requirements.”

Paragraph 4.48 add the following text after bullet points:

“Accordingly, the inner boundary of the green belt should be reviewed by the Local Development Plans to meet the physical and other requirements set out in Scottish Planning Policy as well as the future development requirements set out in

this Proposed Plan.”

Strategic Support Measure 8 add the following text to the last sentence:

“...are achieved and the urban areas, towns and villages can expand to meet both strategic and local development requirements.’

**E51/2 Scottish Government (Directorate for the Built Environment)**

We recommend that the reporter invites the Strategic Development Planning Authority to clarify their view as to what the spatial extent of the green belt should be, and/or imports relevant material from the existing Structure Plan into the Strategic Development Plan sufficiently to ensure that the requirements of Scottish Planning Policy are met.

**E52/10 Mactaggart and Mickel (Homes) Ltd.**

New Strategy Support Measure requiring a strategic review of the future key aims and purposes of the green belt as a planning policy and providing a framework for green belts to be reviewed in this context by each Local Development Plan.

**E55/3 Homes for Scotland**

Paragraph 4.48, second sentence

insert after “key” the words “social, economic and”.

Paragraph 4.48, add a new second bullet point:

“being drawn to provide sufficient development land to meet all likely strategic and local development requirements for at least the next 20 years”.

Strategic Support Measure 8, third sentence

Delete “environmental” to make clear that there are multiple objectives to be met, not just environmental.

**Summary of responses (including reasons) by planning authority:**

The comments relating to green belt can be split into three categories:

- 1) the need to meet Scottish Planning Policy requirements for green belt review;
- 2) the need for a green belt boundary review and the desire to see some consistency in the form of policy direction within the Proposed Plan; and
- 3) Specific wording changes.

1) Scottish Planning Policy requirements for green belt

**E42/1 Lynch Homes, E45/1 CALA Homes (West), E51/2 Scottish Government (Directorate for the Built Environment), E52/10 Mactaggart and Mickel (Homes) Ltd., E55/3 Homes for Scotland**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications.

- In response to meeting the requirements of Scottish Planning Policy (paragraphs 159-163, Supporting Document 1) in relation to green belt, the Glasgow and the Clyde Valley Strategic Development Planning Authority has set out in the Proposed Plan the fundamental principles of green belt and its strategic roles within the terms of a compact city-region and sustainable development model (page 12, Diagram 7, Urban Fabric and Environment).

- The importance of directing development to addressing the long-term vacant and derelict land resource is a priority in sustainable development terms. Alongside the guidance offered in the Scottish Planning Policy, the Glasgow and the Clyde Valley Strategic Development Planning Authority considers that the Proposed Plan provides clear direction and a sufficiently robust framework for the forthcoming green belt reviews to be undertaken by the individual local authorities as part of the Local Development Plans preparation; in particular the framework
  - acknowledges and supports the crucial role of a quality environment in aiding economic competitiveness and aims to protect and enhance the quality, character, landscape settings and the identity of the city and its surrounding towns. The green network concept and green belts are complementary in this respect
  - directs planned growth to brownfield sites over greenfield, thus supporting regeneration
  - in conjunction with the green network concept, seeks to protect and give access to open space within and around towns
  - already supports extensive green belt release to meet the demands of long-term community growth in thirteen different communities sustainably linked to the core of the city-region (page 21, Diagram 10)

**E51/2 Scottish Government (Directorate for the Built Environment)**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification.

- It considers that the Proposed Plan meets the requirements of Scottish Planning Policy as it relates to Strategic Development Plans and the green belt. This is evidenced in paragraph 4.48 (page 34) which outlines the need for a green belt and its important role in achieving key environmental sustainability objectives.
- The underlying principles of the city vision recognise the important role that a high quality urban fabric and a quality environment have to play in aiding economic competitiveness.
- These roles are further strengthened in Strategy Support Measure 8, 'Green infrastructure: an economic necessity' (page 34) which, in strategy terms, attaches importance to the contribution that green belts make to economic competitiveness and quality of life, in conjunction with positive green network action.
- Moreover, Strategy Support Measure 8 clearly states that the review and designation of inner and outer boundaries of the green belt is unnecessarily detailed for Strategic Development Plan founded on Vision and Strategy and this level of locational detail should be priority for local development plans.
- It is considered that together, the Spatial Vision, paragraph 4.48 and Strategy Support Measure 8 meet the requirements of the Scottish Planning Policy in setting a clear and robust strategic framework for detailed green belt boundary reviews in local development plans.

- It is inappropriate for the Strategic Development Plan to dictate detailed locational specification of green belt boundaries to Local Development Plans. It is part of the Scottish Government's culture change agenda and its new Planning legislation that detailed locational planning is devolved to Local Development Plans working within the broader Vision and Strategy of the Strategic Development Plan. The Proposed Plan meets that demand of the Scottish Government.
- With regard to the lack of a clearly defined green belt, either in mapped form or in text, whilst the Glasgow and the Clyde Valley Structure Plan 2006 contains an indicative diagram of green belt, this diagram was intended merely to illustrate relatively new concepts. It shows notional annotation of green belt concepts such as green wedges and corridors set within a wider concept of the Green Network.
- It does not intentionally relate specifically to identifiable features on the ground.
- The Glasgow and the Clyde Valley Strategic Development Planning Authority considered the inclusion of similar notional diagrams unnecessarily detailed and potentially misleading for the Strategic Development Plan.

2) Consistency in Green Belt boundary review and policy direction within the Proposed Plan

**E6 Quarriers, E23 Scottish Property Federation, E42/1 Lynch Homes, E45/1 CALA Homes (West), E51/2 Scottish Government (Directorate for the Built Environment), E52/10 Mactaggart and Mickel (Homes) Ltd., E55/3 Homes for Scotland**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification as it considers that in seeking to deliver a Strategic Development Plan which is 'concise and visionary' the repetition of the guidance contained with Scottish Planning Policy within the text of the Proposed Plan is unnecessary.

It is considered that paragraph 4.48 and Strategy Support Measure 8 are of an appropriate level of detail for a Strategic Development Plan and this adequately provides for the required level of consistency across the Glasgow and the Clyde Valley Strategic Development Planning Authority area and that the level of detail sought by the respondents is more appropriately dealt with at the Local Development Plan level.

3) Specific wording changes

**E13/3 sportscotland**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modification. The Glasgow and the Clyde Valley Strategic Development Planning Authority recognises the desire to avoid ambiguity over the purpose of the green belt as it relates to outdoor sport. However, in the context of the complementary relationship of green belt and green networks, the Glasgow and the Clyde Valley Strategic Development Planning Authority considers that the spirit of the changes sought by Respondent **E13/3** is already contained within the

text of the Proposed Plan.

**E42/1 Lynch Homes, E45/1 CALA Homes (West)**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications to Paragraphs 4.45 and 4.48 and Strategic Support Measure 8 as it considers the proposed wording would undermine the principles of the Strategic Development Plan’s Spatial Vision and Spatial Development Strategy.

**E55/3 Homes for Scotland**

The Glasgow and the Clyde Valley Strategic Development Planning Authority rejects the proposed modifications to Paragraphs 4.48 and Strategy Support Measure 8 on the grounds that

- it considers the proposed wording would undermine the principles of the Strategic Development Plan’s Spatial Vision and Spatial Development Strategy.
- It considers that appropriate land allocations for the next twenty years are integral to the Spatial Development Strategy and its focus on a ‘compact city-region’ model addressing sustainable economic growth and development whilst also meeting the demands of the Scottish Government’s climate change legislation and its Planning Policy guidance.

**Reporter’s conclusions:**

**Reporter’s recommendations:**