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TO *scotplan@gov.scot*
DATE 27 April 2020

Protecting the Edinburgh & Lothians Green Belt

Dear Sirs**,**

NPF4 Call for Ideas

Preface

The Edinburgh and Lothians Greenbelt Network was set up in 2002 by the Cockburn Association [Edinburgh Civic Trust est.1875], The Friends of the Edinburgh Green Belt [est. 2002] and The Green Belt Alliance: Edinburgh [est. 2002]. Their main aim is: **'To promote and campaign for a reassessment of the role of the Edinburgh Green Belt and surrounding countryside, including the effective protection of its rural character, biodiversity, recreational quality and amenity offered to local communities'.**

The Edinburgh and Lothians Greenbelt Network has been very concerned at the continuing erosion of Edinburgh's Green Belt by developments since its introduction in 1949.[1]

Based on our experience on planning matters in our communities, we are pleased to have the opportunity to offer some ideas to develop NPF4 so that it can respond to issues we know have to be addressed by 2050. This response would have been quite different had Covid-19 (and its possible successors) not intervened in March. We must think beyond the short 30-year timescale to a different world where current values, like sustained emphasis on growth, may seem inappropriate. Covid-19 is a reminder that life is not predictable and that some of what we plan for today, may have to be adjusted well within the lifespan of this Plan.

We have linked the issues that most concern us in order of dependence. These are:

- **Climate Change preparations**
- **Green Belts and Food Sustainability**
- **Brownfield sites**
- **Population Dispersal and Broadband Expansion**
- **Changing the way we build our towns**
- **Truly sustainable transport systems**
- **Perpetual planning permission.**

Climate Change Preparations

Scotland comprises a large number of islands, but with Climate Changes, these islands are reducing in size, some of the most fertile lands being lost to flooding or tidal erosion. In his book[2], Neil Oliver referred to the effect of the movement of a seabed shelf 200 miles long

[1] Patrick Abercrombie and Derek Plumstead, **"A Civic Survey and Plan for Edinburgh".**

[2] *"A History of Ancient Britain"* (p76)

and 70 miles off the coast of Norway, around 6,000BC. The movement of thousands of cubic miles of rock and sediment caused a massive shift of seawater in all directions, impacting, *inter alia*, Norway and Britain. Oliver reckoned that the consequential tsunami first resulted in water being drawn away from the coastline, then pouring back to penetrate up to 50 miles inland, destroying settlements on the way. It only took a short time for nature to recover but not so the communities lost to the sea. Similarly the coastline was redefined.

So we must prepare for similar events that could cause the loss of more of our fertile lands in the coming century. We do ***not*** have an unlimited supply of land that can be used for building construction. With the world's population set to increase by a third by 2070, and the Thames to rise by 2.5m by the end of this century, ***we need to determine how much land this nation needs for its own survival***, adding a margin to allow for the unexpected.

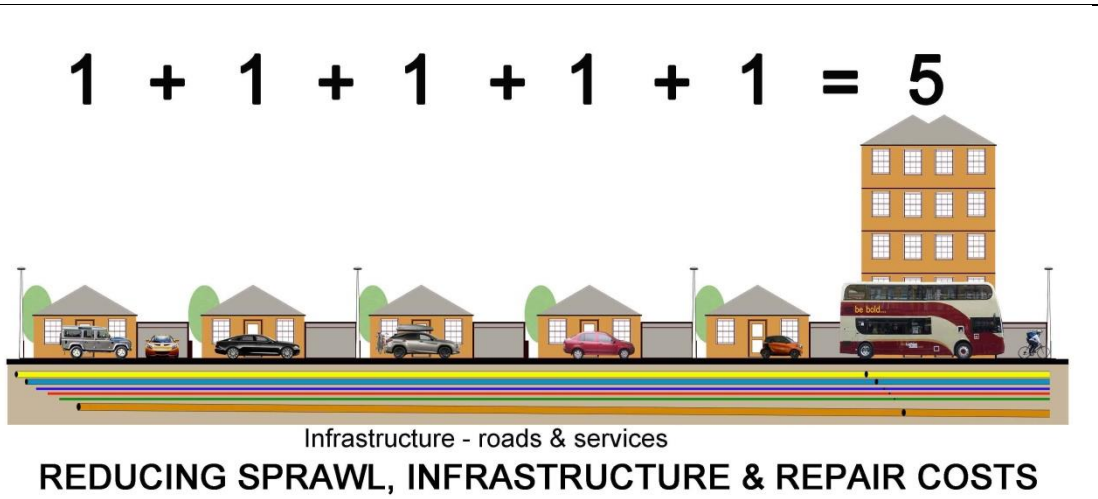
We need to be better able to feed ourselves from within our shores and be less dependent on overseas suppliers (from whom we understand we derive 40% of our foodstuffs). In future, more mouths around the world will be looking at the diminishing food supplies, which might provide Scotland with an export opportunity to improve her GDP instead of having to pay more to feed the nation.

Moreover, according to David Beasley[3], head of the UN's World Food Programme, the Coronavirus Pandemic could create widespread famines *'of biblical proportions'*, raising the number of people suffering from hunger from 135 million to more than 250 million. If Scotland is not to be drawn into that crisis, it has to ensure it has enough land to feed itself – and better still, any surplus food could feed others.

The way we allocate our land for development requires an holistic approach. We recommend a starting point would be to commission the James Hutton Institute to revise the 1984-87 *Land Capability for Agriculture Maps* prepared by the Macaulay Institute for Soil Research to determine what lands remain available for agriculture, taking account of trends away from livestock. From this starting point, we can determine the amount of land we can afford to be built upon leaving enough for food production. ***Food security must be a primary consideration***. Brexit and Covid-19 will simply add to the problems we will experience if we fail to reduce our dependence on overseas supplies.

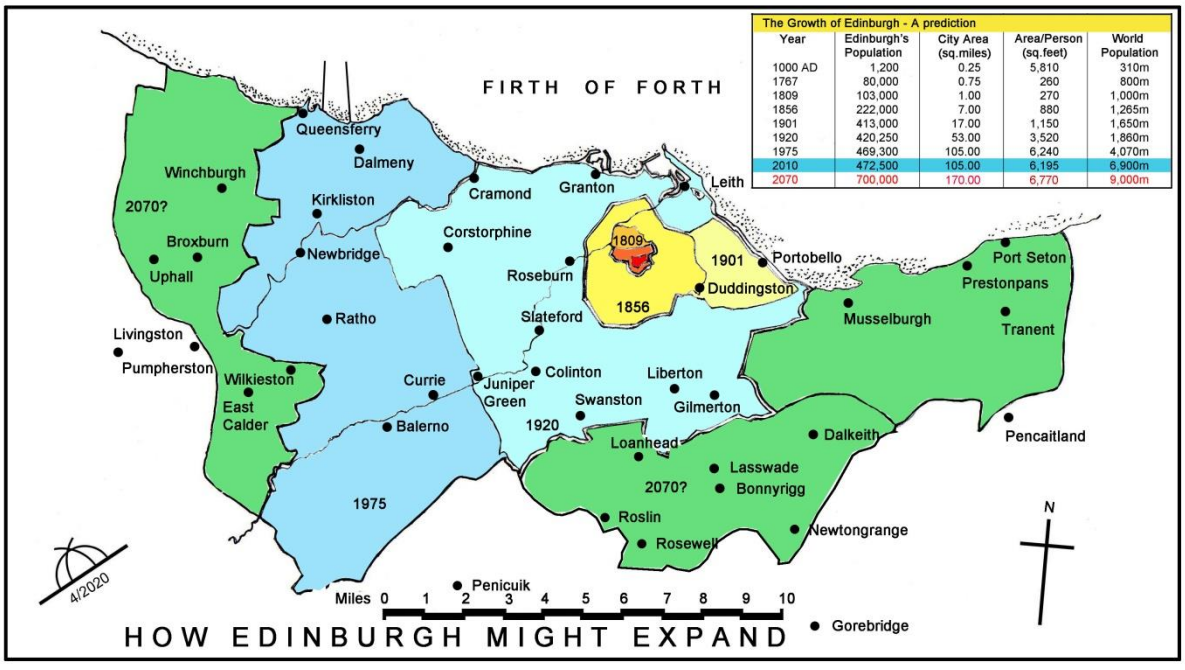
In conclusion to this section, we stress that a significant part of our Climate Change preparations have to include identifying what land we have available for agriculture, of whatever nature, and by deduction, what land is available for building upon while ensuring there is a substantial margin for future needs, recreation, flood controls, etc..

[3] BBC News (21st April 2020) https://www.bbc.co.uk/news/world-52373888



Building upwards (in appropriate places) increases density, reduces the need for extensive and expensive transport systems and hence fuel consumption, reduces the amount of infrastructure needing maintaining and encourages active travel. At the same time it preserves more land for food production and for the well-being of future generations.

Associated with this is the need to discourage existing communities from spreading beyond their existing footprint – building upwards (i.e. to a greater density) should become an important option instead of automatically allowing the continuing urban sprawl we have contributed to over the past 100 years.



This plan shows how Edinburgh has expanded over the centuries across some of the most fertile land in Scotland, absorbing settlements on the way and indicating where future sprawl may occur. Similar plans for other towns across the Central Belt would help show how much farmland has been lost.

Green Belts and Food Sustainability

Having determined the land needed for Food Security, allowing for the good and bad years and preserving our food-producing lands, we need to promote farming as a worthwhile career. One of the reasons Green Belts were introduced was to resist urban sprawl but as long as Green Belts are perceived (by some) as land reservoirs for development, whatever its LCA classification, then we are going to struggle to retain the land needed to feed ourselves. Green Belts are a way of protecting our farm land, so might also be seen as Food Belts – areas suitable for allotments, parkland/woods, outdoor recreation spaces, amenity preservers and buffers between town and country.

Brownfield Sites

One of the reasons brownfield sites exist is because the factory that was the focal point and main source of employment in the centre of a community has ceased to exist. But if these sites are 'tidied up' by building houses on them, then the result is that people have to commute out of the area to an industrial estate or remote office. That is neither good for the social fabric of the community or the physical infrastructure (sewerage, water supply, gas, electricity, telecommunications, public transport, parking provision, schools, GP surgeries, pharmacies, hospitals, shops, banks, post offices, libraries, parkland, etc. that have developed in the area over many years). When the Gorbals slums were demolished, the community fell apart as people were dispersed to places with 'the benefit' of *all mod cons*. To preserve active life in communities, extending transport to remote industrial estates and offices contributes very little beyond adding to urban sprawl. Brownfield sites should be retained as opportunities to provide similar uses in an improved environment to what existed before, but not dependent on a single major employer as its disappearance would leave a big hole that would be very difficult to fill with a similarly-qualified labour force.

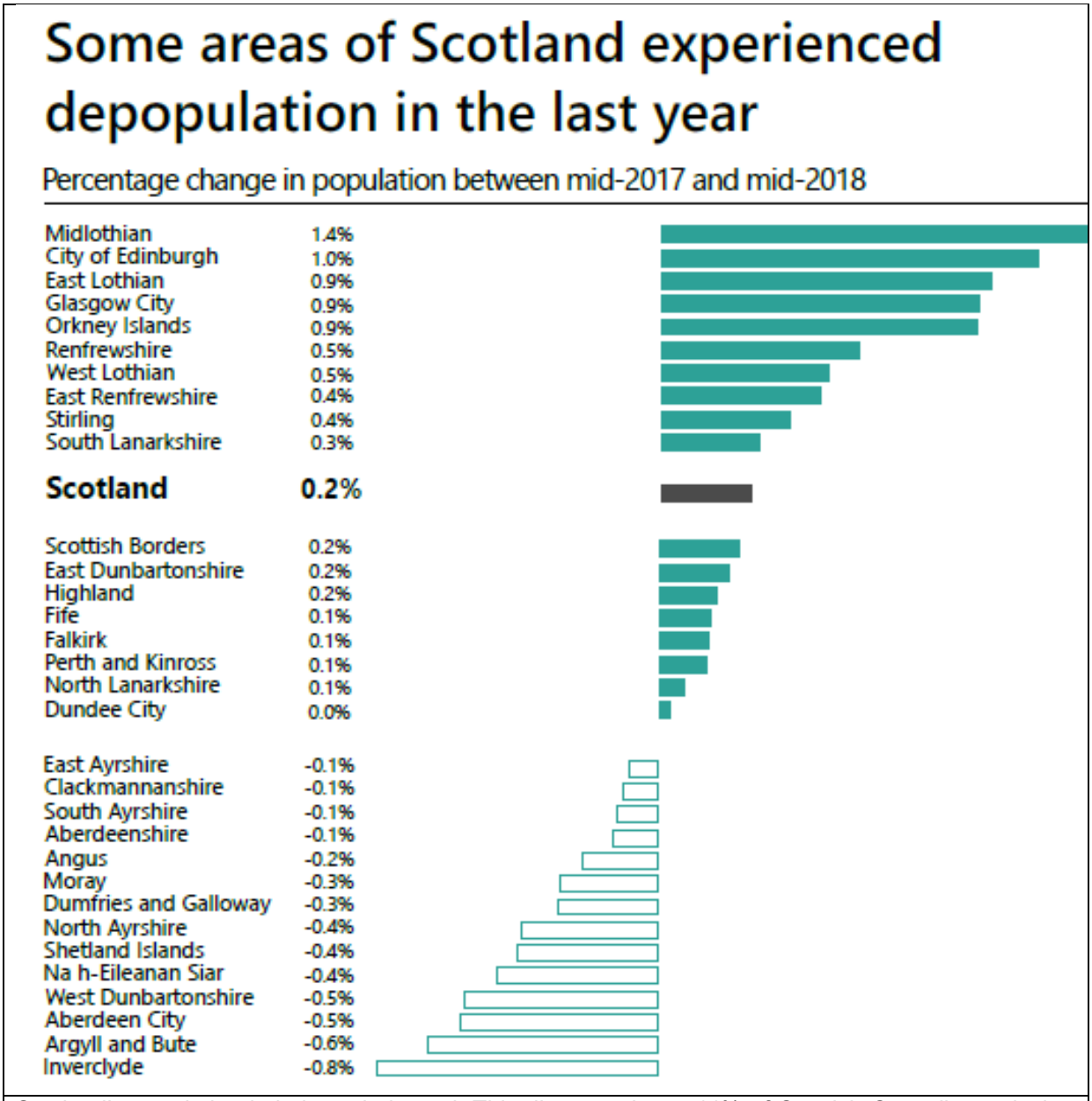
Population Dispersal and Broadband Expansion

Scotland's population has only grown marginally over the years, and that to a large extent because of immigration. The NRS Infographic Reports of 2017 and 2018 show Scotland's indigenous population declining (noticeably since the EU referendum), the population ageing and uncertainty (2017 version) as to what population growth might be when the UK exits the EU.

The 2018 NRS diagram shows that out of 32 Scottish Councils, 14 (44%) have experienced decreases in population while 10, including Midlothian and Edinburgh are expecting rises beyond average population increases. If work was dispersed to the under-populated areas, it would be to their benefit and reduce the extent to which areas in the SESplan area are overheating.

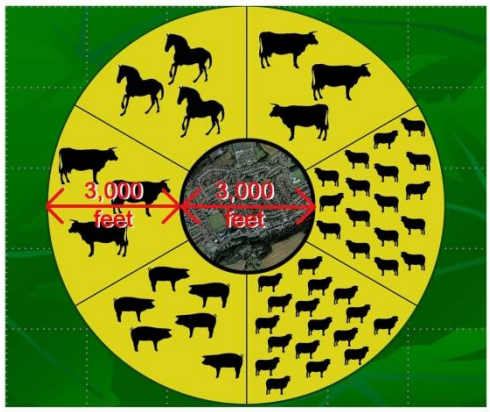
Coupled with dispersal is the need to expand and improve broadband. Covid-19 has revealed that many normally office-based staff can work remotely for a period instead of from a central location. That can be exploited to the benefit of communities, bringing a reduction in fuel consumption for transport, better maintained roads and less sprawl into the countryside. With financial encouragements to work in the areas where there is most depopulation, including remote university learning, benefits will be felt not just in run-down communities but also in those towns experiencing severe overheating (like Edinburgh and its Lothian neighbours).

However, we do not see forests of increasingly tall wind turbines contributing anything to Scotland's amenity; in our view not enough attention has been paid to developing wave power which is predictable and largely invisible and would do little damage to Scotland's attractive landscape.

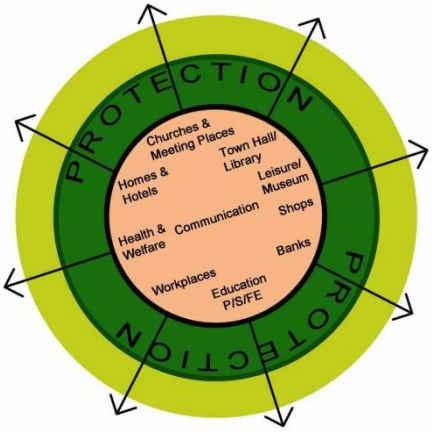


Scotland's population is being rebalanced. This diagram shows 44% of Scottish Councils are losing population; the previous (2017) report showed 25% losing population. The gap is growing.
Source: ***National Registers of Scotland, Infographic Report – Scotland's Population 2018***

Changing the way we build our towns



Town planning c1400BC The town core was to be 3,000 feet in diameter with a 3,000 foot wide belt of common land beyond, for agricultural use, by the inhabitants. (Book of Numbers 35 (1-5)).



History tells us that we built our towns defensively using city walls to house our people. In 1949, Abercrombie and Plumstead proposed to contain or protect Edinburgh with a Green Belt instead.

In recent years, it has been hard to see where a masterplan has guided the design and development of our towns. *Ad-hoc* housing on the next available field, some looking suspiciously like part of an unannounced longer term phased development, have been approved and built often through *'planning by appeal'*. Local Place Plans might be a good way to develop Community Empowerment and create better environments, if guided by suitably qualified professional staff paid for by the Scottish Government. We are aware of very large estates having no shops or community facilities whatsoever, the result being that large numbers of people are trapped in car dependency, not alleviated by a remote and infrequent bus service accessible more than 400m distant, which is needed to go to school, the shops, to recreation facilities and so on.

We think a different approach is needed. We should build more compactly, within the existing footprint of our towns and to higher densities in their centres (e.g. up to 5 storeys high. Affordable houses should be built within the community and not be the subject of commuted sums for such houses to be built elsewhere, this being an easy/cheap way for developers to off-load those parts of developments that are a burden to them or spoil the image of what they were trying to achieve.

We believe each 'village' community should have a focal point, like a town or community hall with a clock, accessible, useful-sized public parks and toilet facilities. Covid-19 tells us that our villages need to be permeable, preferably with important destinations no more than 400m from houses (e.g. to nearby green spaces, especially for small apartments) and at least some food shops, a Post Office and Bank, a pharmacy, a medical practice and reasonable parking provision.

We have spent years looking at transport facilities to solve connectivity issues created by separating housing 'dormitories' from places of work. But Covid-19 has shown that the ability to practice 'active travel' (currently mainly recreational during the pandemic) and not be dependent on crowded buses and trams, can make for healthier living. While planning for another 'Covid-19' event might seem to be taking us back to an earlier time when having to travel long time-consuming distances was not the norm, perhaps that is the way we should be planning our future.

It seems easier to masterplan a new town than redesign established communities. The sale of great landed estates or council property for housing development now means that to do anything on a medium to large scale for the benefit of a community, would require that councils be involved in lengthy/expensive compulsory purchase processes. But need that be entirely so?

A report commissioned by Saga in 2013[4] said that 1 in 8 homeowners do not have the resources to maintain their own property. If mechanisms can be devised to enable councils to acquire such properties while allowing the former owner to continue living there as a rent free(?) tenant, the property could be repaired/modified and reused for future affordable accommodation. For example, when the tenant no longer needs the property, it could continue in such rental use or be converted to another purpose, such as a 'corner shop'. That would allow communities to evolve gradually into something more self-contained and less dependent on remote shopping facilities only accessible by those who can afford to run a car.

Truly sustainable transport systems.

When it comes to mass movement, any form of transport that uses guided ways, like trams, cannot be described as 'sustainable'. Firstly, they usually need to be built at the same time as the communities they serve. But we know that the buildings along their routes will change over the years as different needs demand (tortuous modern tram routes through old and busy cities illustrate the difficulties). Secondly, some event like a fire or water leak along the route will stop them completing their journey, unless there is an alternative route. Thirdly, the guided way will, just as any other rail way, need periodic replacement – it is not in fact a 'permanent way'.

Then there is the question as to how these vehicles are powered and, as electricity tends to be the preferred energy source, there need to be power stations and intrusive, overhead transmission lines. It appears to us to be unwise to spend huge sums of money on inflexible systems like Edinburgh's trams, introduced in 1871, removed in 1956 and reintroduced to a very limited degree in 2014. Neither are we convinced that the main way forward is the autonomous self-driving vehicle, but it would be no surprise to see them replace trams within the next ten years – a flexible alternative for routes no tram could attempt.

Some public transport systems will be essential. However, as the majority of our transport needs are at times, or routes when public transport is not available, we will continue to need small vehicles to do the mundane things we all do. Whether they be fuelled by petrol, diesel or hydrogen (using more efficient engines and filters to minimise/prevent pollution) or by electricity, we will continue to need parking provision for ourselves, care workers, the furniture delivery van and the undertaker. So good parking is needed in close proximity to our homes, shops, hospitals, public and recreational places. Underground parking may be an option worth exploring, so that land at ground level can be better used.

Coronavirus has shown us that it is time to review our actual transport needs.

Perpetual Planning Permission, etc.

While this heading may not seem relevant to NPF4, there are areas where improvements in planning procedures would help ensure that the system is kept relevant. We were disappointed with the outcome of the Planning Act 2019, as we saw this as an opportunity to simplify the system. Sadly, we now have another layer of complexity rather than a much simplified framework for good design. We expect much time will still be spent dealing with

[4] Saga commissioned report: 'This is Money'', 28 January 2013: https://www.thisismoney.co.uk/money/bills/article-2269555/Millions-50s-fail-repair-home-afford-new-survey-suggests.html

appeals and disputes. Planning remains an adversarial system where communities of well-meaning people are often faced with obstructions when a proposal is made by an outsider developer for something contrary to what the long term residents of the area want.

One of the issues that doesn't seem to have been effectively dealt with is 'Perpetual Planning Permission', where a developer may obtain planning permission and fail to do more than dig a drain trench that is subsequently abandoned, and then claim that development has commenced. Such action keeps the 'value' of the site high, even though it may remain unused and unkempt. This loophole should be stopped up. Development should be commenced within three years of obtaining permission and that part not completed within five years from the date of approval (the duration of a Local Plan), should be subject to a fresh planning application. This would have a presumption that it would not be granted, unless there was compelling new evidence that what was being proposed was needed and would be provided within three years. The reason for this is simply that circumstances change and that local authorities need certainty in planning for infrastructure, schools, public services, etc..

We are pleased to submit these comments and trust that they will be useful in reshaping the next National Planning Framework.

Yours sincerely,

Archie Clark

For the Edinburgh and Lothians Greenbelt Network.

Encl. Respondent Information Form