

30 April 2020

BY EMAIL: scotplan@gov.scot

Dear Sir/Madam

Consultation on the Scottish Government National Planning Framework 4

We write on behalf of Swanston Farm Limited and its joint company Hillend Leisure Ltd. Together, these businesses manage farmland and recreational facilities in the Edinburgh green belt, to the south of the city and the northern slopes of the Pentland Hills. This representation to the NPF 4 consultation seeks to secure an amendment to national green belt policy in future. We are requesting that the criteria put forward in national policy is amended to allow some limited built facilities in green belts where they would help to deliver high quality facilities for outdoor recreation and exercise purposes.

Our clients have previously undertaken successful developments in the green belt, which have helped to stimulate and extend rural recreational activities, particularly through additional planting, equestrian, golfing and hiking facilities. With this masterplan at Swanston farm, the central theme has been to allow new recreational activities for urban citizens to sit comfortably alongside the continued function of farmland in the green belt.

Whilst our clients could have made representations at national and local planning authority level to remove a green belt allocation, this is not been their preference. It is considered that the past developments and potential future developments can continue to succeed, but with a green belt policy at national level which has a slight relaxation in future. This is the essence of our representation on NPF 4.

Currently, our clients are proposing a new Pentland Trail Centre at this location. This will be focussed on an international standard outdoor mountain bike trail facility and hiking centre, on the site of the former Lothianburn golf course, adjoining Midlothian Council's Hillend Snow Sports Centre which is also subject to new development proposals.

The attached correspondence submitted recently on the Pentland Hills Regional Park Management Plan and on the Edinburgh City Plan 2030 give a full explanation of the context. Essentially, the development of new facilities of this nature will be more viable if a limited amount of indoor built facility is permitted alongside an ambitious new outdoor recreational management plan.

At the heart of this proposal is green belt policy and the previous/current restrictive policy at national level.

We point in particular to paragraph 52 of the existing Scottish planning policy which notes that local development plans should describe the types and scales of development which would be appropriate within a green belt and suggests, inter alia, that this may include: development associated with agriculture, development associated with woodland and forestry, including community woodlands and horticulture etc. At the fourth criterion in the previous SPP there is specific mention of recreational uses that are compatible with an agricultural or natural setting. It is in this latter category where we respectfully invite Scottish Government to review future national policy. Local development plans should be given the flexibility to make allowance for some further built facilities in the green belt, where these would help to promote active recreation and outdoor activities and subject to environmental impacts.

Our clients believe that city populations in Scotland should be given stronger opportunities through urban and rural planning to pursue improved human health and well-being, particularly through outdoor recreation and exercise. This was already a topic of increasing importance during the commencement of the recent Scottish planning reform. We expect that post the Covid-19 crisis; these topics will be given significant refreshed emphasis in future national planning policy.

Accordingly, we invite Scottish Government to re-consider the criteria for regarding development allowances in green belts and to look to good examples such as Swanston farm, where built facilities in the green belt sit comfortably alongside outdoor recreation and continued agricultural working.

In future, we encourage NPF 4 to address a change to national green belt policy to adapt the fourth criteria as it appears under para 52 in the SPP. The suggestion is wording to be amended as follows:

... Recreational uses and outdoor activities that are compatible with the local natural setting; with some allowances for built indoor facilities of acceptable design and environmental impact, and where there is clearly a link and benefit derived from the new built facilities which enhances the outdoor recreational enjoyment of the countryside...

We believe this alteration to national green belt policy would be compliant with the central themes of the NPF4 consultation, particularly:

- *Whether we need to think about the concept of green belts.*
- *How we can plan blue and green infrastructure.*
- *What we will need to do to reach the target of net zero emissions by 2045*
- *How we can strengthen the character and heritage of our many different places.*
- *Whether we could target development to address longstanding differences in health and quality of life.*
- *How places could be more inclusive, diverse, creative, vibrant, safe, resilient and empowering.*
- *What special places will need protection in the future.*

This concludes our representations on NPF 4. More details of the Pentland trail centre are available on the Swanston farm website (recent public consultation as detailed here: <https://swanston.co.uk/pentland-trail-centre/>).

The attached letters in respect to the Edinburgh City Plan 2030 and the Pentland Hills Regional Park Management Plan give further details. Our clients would be pleased to discuss their case and their own experiences further, should this be appropriate.

Yours sincerely



Oliver Munden BSc MRTPI
Senior Planner


oliver.munden@avisonyoung.com
For and on behalf of Avison Young (UK) Limited

Encl:

- Pentland Hills Regional park Management Plan representations - January 20
- Edinburgh 'Choices for City Plan 2030' Representations - April 20