



AL/LS

25 October 2005

Sandra Carey
Scottish Executive Development Department
Planning Services
2-H Victoria Quay
Edinburgh
EH6 6QQ

Dear Ms Carey

Planning Policy 21: Greenbelts - Consultative Consultation Draft

Homes for Scotland is grateful for the opportunity to comment on the Consultation Draft of Scottish Planning Policy 21: Greenbelts.

As an organisation, whose member companies build over 93% of all new houses in Scotland each year, we are aware of the extent to which the inappropriate use of greenbelt policies can (a) result in environmental dereliction where land protected by greenbelt status cannot find a sustainable use and (b) force housing development into locations which increase both commuting times and road congestion.

Homes for Scotland supports the key objectives set out in paragraph 6 of the draft Planning Policy to direct planning growth to the most appropriate locations, protect and enhance the character of landscape setting and identity of towns and cities and to protect and give access to open space. However, we take the view that where greenbelt designations are being used to achieve those objectives a greenbelt area should only be defined once development land to accommodate future growth has been identified through long-term settlement strategies.

In paragraph 8 the draft policy statement makes reference to greenbelts being long term planning tools with paragraph 16 defining long "term" as 20 years. Homes for Scotland considers that time frame to be appropriate.



Homes for Scotland shares the view expressed in paragraph 12 of the document that most settlements do not require greenbelts. In the past we have consistently urged planning authorities to use other policies to protect the settings of our towns and cities and in particular it is our view that planning authorities should seek to accommodate growth by seeking to release significant areas of land on the edge of settlements and to use master planning and development briefs to ensure not only high environmental quality but also to promote the place-making agenda.

Homes for Scotland is supportive of the advice given in paragraph 16 of the document. However, it may be appropriate to re-enforce the policy position by introducing a sentence which explicitly states that land likely to have development potential within a 20 year time frame should not be zoned as greenbelt land.

I trust the foregoing comments are of assistance and I would be happy to provide more detailed comment on the above matters if you felt that to be of assistance.

Yours sincerely

Allan Lundmark
Director of Planning & Communications