



RTPI

mediation of space · making of place

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Ms Norlyne Rosewarne
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7th August 2006

Dear Norlyne

Greenspace for Communities: policy review

The Royal Town Planning Institute (RTPI) welcomes the opportunity to respond to this consultation which addresses the future of the Greenspace for Communities Initiative (GfCI) and related greenspace policy in Scotland.

The RTPI is the UK body chartered to represent the planning profession and offers these comments from the point of view of a diverse and policy neutral professional body committed to supporting devolved government in Scotland. The Institute has approximately 1900 members in Scotland. Since devolution, the Institute has empowered its RTPI in Scotland Office, together with its Scottish Executive Committee, with the responsibility for working with government and public bodies for the improvement of the planning system in Scotland. This is in accordance with its charter obligation to work for the public interest.

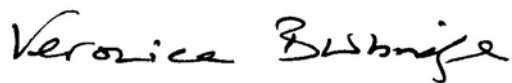
The Institute's detailed comments in response to the questions raised in the consultation paper are set out in Annex 1 to this letter. In summary, the Institute considers that:

- the policy context within which greenspace issues are considered has changed substantially since 2001. The Greenspace for Communities initiative has itself contributed to the transformation of this policy scene and there is now a need to build on this experience and to develop a more integrated cross-departmental approach from within the Scottish Executive, building on the success of the National Planning Framework;

- the review might give greater emphasis to the need for closer alignment of vision, strategy, objectives and policies between community plans and statutory development plans at the strategic and local level; and to the opportunity to re-examine development management practices and the contribution that might be made through Section 75 agreements;
- there is a need for a national greenspace organisation to undertake the roles outlined in paragraph 6.3 of the consultation document. The Institute recognises the excellent work done by Greenspace Scotland in this field;
- the funding principles set out in paragraph 7.38 (R21) of the paper are sound. The Institute agrees with the recommendations set out in R22 although we would suggest that the fifth bullet might be expanded to include representatives from across Scottish Executive Departments; Communities Scotland; and CoSLA;
- the funding for a national organisation, as set out in the consultation paper, should not flow solely from SNH. However, SNH should continue to have an advisory role in relation to natural heritage aspects of greenspace policy and delivery.

The Institute trusts that these comments are of assistance and has no objection to its comments being made available to the public in the usual way. Should you wish any clarification or further assistance please do not hesitate to contact me at our Edinburgh office: 57 Melville Street Edinburgh, EH3 7HL phone: 0131 226 1959, or email: veronica.burbridge@rtpi.org.uk

Yours sincerely



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Annex 1

Comments by the Royal Town Planning Institute in response to the Consultation on the Greenspace for Communities Review

Policy Context

1. The Royal Town Planning Institute (RTPI) agrees that the policy context within which greenspace issues are considered has changed substantially since 2001. The developments which have taken place with regard to policies on sustainable development, regeneration, environmental justice, community engagement, health and quality of life, as noted in the consultation paper, all contribute to a more proactive policy framework. The RTPI considers that the Greenspace for Communities initiative has itself contributed to the transformation of this policy scene but that there is now a need to build on this experience and to develop a more integrated cross-departmental approach from within the Scottish Executive, building on the success of the National Planning Framework.
2. The future of the GfCI will be greatly influenced by wider policy developments and by the availability and direction of related funding streams. The current scale of action on urban greenspace in Scotland is inadequate to provide the scale of improvement required. This is an important national issue requiring leadership from the Scottish Executive and endorsement of its national importance through the National Planning Framework. Wider cross departmental policy appraisal of the role of greenspace in sustainable communities is needed within the Scottish Executive. The transfer of responsibilities for greenspace to the Environmental Futures Division in the Sustainable Development Directorate of the Scottish Executive should provide the impetus for such work.
3. Other policy stimuli to which the paper might refer include work by the Royal Commission on Environmental Pollution on the Urban Environment; the European Landscape Convention; and work by the European Commission on its Thematic Strategy on the Urban Environment. The consultation paper should also make stronger links to Scottish Planning Policies on Greenbelts (SPP 21), Town Centres and Retailing (SPP 8), Planning for Housing (SPP 3), and to the revisions of NPPG 14 on the Natural Heritage and NPPG 11 on Sport, Physical Recreation and Openspace. In addition to the Planning Advice Note on Planning and Open Space, reference might also be made to Planning Advice Notes on Designing Safer Places; and Inclusive Design. Further work on greenspace should also be linked to Scottish Historic Environmental Policy 3 on Gardens and Designed Landscapes and to wider policies on landscape.
4. The Institute agrees that a major issue is how to ‘mainstream’ greenspace issues across national and local policy areas and how to integrate economic, social and environmental aspects of ‘green infrastructure’ in local delivery programmes. The Institute considers that the planning process has a crucial role to play in formulating policy and in making the transition to delivery on the ground. However, as noted in the consultation paper, relevant data and information to underpin evidence based policy is required and is often missing. The Institute supports the need for emphasis on the completion of open space audits and the production of a ‘State of Scottish Greenspace’ report.

Local Delivery

5. The Institute agrees that Community Planning Partnerships, including LECs, together with SNH and the Forestry Commission should play a crucial role in the provision and management of greenspace as part of their work in securing quality of life objectives and in integrating agency activities at the local level. However, there is a need for closer alignment of vision, strategy, objectives and policies between community plans and statutory development plans. Now that attention is being directed to changing the culture and statutory basis of planning, there is also an opportunity to re-examine development management practices and to recognise the contribution that might be made through Section 75 agreements. The review and consultation paper might give greater emphasis to these relationships and to the role of the planning system in the delivery of greenspace objectives.

National delivery

6. The Institute supports the need for a national greenspace organisation to undertake the roles outlined in paragraph 6.3 of the consultation document. The Institute recognises the excellent work done by Greenspace Scotland in this field. The Institute considers that a national greenspace organisation should act as a national champion, making good practice advice and support available to a wide range of organisations engaged in greenspace planning and delivery. The Institute supports the key roles proposed in paragraph 6.34 (R13) of the consultation paper.

Funding

7. The Institute agrees with the funding principles set out in paragraph 7.38 (R21) of the paper and with the recommendations as set out in R22. The Institute suggests that the fifth bullet might be expanded to include representatives from Scottish Executive Departments (SEERAD (Environmental Futures), SEDD (Planning Division, SE Housing and Area Regeneration) and the SE Health Department); Communities Scotland; and CoSLA.

Role of SNH

8. The Institute agrees that the funding for a national organisation, as set out in the consultation paper, should not flow solely from SNH. However, there will be a continuing need for advice and guidance on natural heritage aspects of greenspace and a continuing role for SNH in contributing to the improvement of Scottish greenspace through the Urban Implementation Plan of the Scottish Biodiversity Strategy.