

Issue 2.3	Brownfield Land	
Development Plan reference:	The Spatial Strategy (pages 12 – 14)	Reporter: [Note: For DPEA use only.]
Body or person(s) submitting a representation raising the issue (including reference number):		
<p>A J C Clark (930956) Cockburn Association (037249) Mr Jon Grounsell (786916) Juniper Green Community Council (028859) National Trust for Scotland (040626) NHS Lothian Public Health and Health Policy (840024) Rosewell and District Community Council (790523) South West Communities Forum (805601)</p>		
Provision of the Development Plan to which the issue relates:	Brownfield land (pages 12 – 14, paragraphs 3.1 – 3.9)	
Planning Authority's summary of the representation(s):		
<p><u>A J C Clark (930956)</u> There is no evidence the brownfield first principle is being backed up by strong policies that encourage farming, discourage the sale of farmland of whatever quality, for housing, and positively encourage high density low-infrastructure brownfield development close to where people already work and shop.</p> <p><u>Cockburn Association (037249), NHS Lothian Public Health and Health Policy (840024), Rosewell and District Community Council (790523)</u> Brownfield land should be used first.</p> <p><u>Mr Jon Grounsell (786916)</u> There are no levers in the planning system to direct new housing onto brownfield land. The requirement to forward supply greenfield housing land removes any incentive to directing growth to more sustainable sites.</p> <p><u>Juniper Green Community Council (028859)</u> Brownfield first is not being observed rigorously. City of Edinburgh planning advice is that Edinburgh could potentially meet 75% of its housing land requirement through brownfield sites. This should be included as an option without the need to identify greenfield sites for development. Also unclear is the amount of brownfield land proposed for use, relative to the total stock of such land.</p> <p><u>National Trust for Scotland (040626)</u> Development should take place on brownfield sites where possible, but the Plan does not quantify the amount of Brownfield land available and how much development it could accommodate.</p>		

South West Communities Forum (805601)

Make a clear policy to direct that brownfield land must be substantially used up before using greenfield land.

Modifications sought by those submitting representations:

Juniper Green Community Council (028859)

No modification specified, representation indicates that all development should be located on brownfield sites.

National Trust for Scotland (040626)

The Plan should quantify brownfield land.

Summary of responses (including reasons) by Planning Authority:

A J C Clark (930956), Cockburn Association (037249), Mr Jon Grounell (786916), Juniper Green Community Council (028859), National Trust for Scotland (040626), NHS Lothian Public Health and Health Policy (840024), Rosewell and District Community Council (790523), South West Communities Forum (805601)

SESplan recognises that the reuse of previously developed land and building (brownfield land) is important in delivering the proposed strategy.

SESplan does not agree that there are '*no levers within the planning system*' to ensure the reuse of previously developed land and buildings. The strategy focuses most new development in and around the largest settlements. This will mean that brownfield land within settlements and strategic growth areas will form an important part of any portfolio of development land, consistent with the principles of paragraphs 48, 80, 101 and 206 of Scottish Planning Policy (ASD06).

Table 3.1 Placemaking Principles contains a clear statement that: 'The re-use or re-development of brownfield land should be considered before new development takes place on greenfield land, including Prime Agricultural Land and other land important for food production.'

SESplan is satisfied that the strategy balances the important objectives of improving access to jobs, services and facilities whilst also reducing the need to travel, protecting the countryside and improving living environments. SESplan does not see any advantage in quantifying the amount of brownfield land available since this will change over time. The allocation of individual development sites will be a matter for Local Development Plans (LDP). Not all development can be met on brownfield land in all locations. Given that SPP is already clear on these matters there is no need for SESplan to repeat this in its proposed plan. Instead the strategy explains how it intends to meet the variety of challenges we face in the future. **No modifications proposed.**

Reporter's conclusions:

[Note: For DPEA use only.]

Reporter's recommendations:

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