

<b>Issue 2.4</b>	<b>Prime Agricultural Land</b>	
<b>Development Plan reference:</b>	<b>Spatial Strategy (pages 12 – 14, paragraphs 3.1 – 3.9)</b>	<b>Reporter:</b> [Note: For DPEA use only.]
<b>Body or person(s) submitting a representation raising the issue (including reference number):</b>		
<p>Mr George Barton (038878)  Cockburn Association (037249)  Damhead and District Community Council (039328)  Esk Valley Trust (037349)  Grange and Prestonfield Community Council (790304)  Juniper Green Community Council (028859)  Mrs Mirabelle Maslin (928549)  Minto Hills Conservation Group (040607)  North Berwick Community Council (035522)  Roslin and Bilston Community Council (790524)  South West Communities Forum (805601)</p>		
<b>Provision of the Development Plan to which the issue relates:</b>	The Spatial Strategy – Prime Agricultural Land	
<b>Planning Authority's summary of the representation(s):</b>		
<p><u>Mr George Barton (038878)</u>  Much greater protection should be given in the Plan to prime agricultural land. Scottish Planning Policy paragraph 80 states that the use of prime agricultural land for development should not be permitted except where it is essential. Much high quality agricultural land is in East Lothian and it should be safeguarded for future generations. Housing should be built on some of the 94.3% of land which is not Prime Quality Land.</p> <p><u>Cockburn Association (037249)</u>  Stronger protection should be given to prime agricultural land to ensure that green land should only be used for development that cannot be accommodated on brownfield land.</p> <p><u>Damhead and District Community Council (039328), Mrs Mirabelle Maslin (928549)</u>  The Plan must ensure that prime agricultural land is effectively protected.</p> <p><u>Esk Valley Trust (037349)</u>  There is no specific policy on safeguarding the best agricultural land.</p> <p><u>Grange and Prestonfield Community Council (790304)</u>  Keeping land for food production near urban centres and the importance of food production should be stressed in paragraph 3.8.</p>		

Juniper Green Community Council (028859)

Promote farming for food security particularly respecting likely post-Brexit restrictions.

Minto Hills Conservation Group (040607)

Paragraph 4.8 should be redrafted to show how crucial the continued good management of prime agricultural land not just to the local or city economy, but to Scotland's.

North Berwick Community Council (035522)

Plan does not emphasise food production. Farmland should only be developed as a last resort.

Roslin and Bilston Community Council (790524)

Areas allocated for development are prime agricultural land, currently providing food. This is irreplaceable and cannot be replaced by green wedges or green networks.

South West Communities Forum (805601)

SESplan should promote food security (for prime and other useful agricultural land) for confirmation in LDPs. Agricultural land should be positively protected and defined in the Glossary as an economic asset for home and export use.

Unfortunately, Edinburgh's LDP has dropped any reference to agricultural land. Disturbed to read in the SESplan SEA <sup>(3)</sup> that '*a significant level of the greenfield land required for development around Edinburgh, Midlothian and East Lothian is prime quality agricultural land and that 'the spatial strategy should seek to avoid developing prime quality agricultural land where possible retaining it for local food production.'* If it is policy to develop brownfield first, then development of land of importance for the maintenance of agriculture must be avoided till that brownfield is substantially exhausted.

**Modifications sought by those submitting representations:**

Damhead and District Community Council (039328)

No modification specified, representations indicate that greater protection should be given to prime agricultural land.

Esk Valley Trust (037349)

No modification specified, representation indicates that the Plan must indicate safeguarding of Agricultural Land Classes 1 to 3.1.

Grange and Prestonfield Community Council (790304)

No modification specified, the representation indicates that keeping land for food production near urban centres and the importance of food production should also be stressed in paragraph 3.8.

Juniper Green Community Council (028859)

No modification specified, representation indicates that farming for food security should be promoted.

North Berwick Community Council (035522)

Propose a hierarchical approach to identifying development sites which recognises agricultural land / food production.

Roslin and Bilston Community Council (790524)

No modification is specified, the representation indicates that prime agricultural land should not be developed until all brownfield sites are used.

South West Communities Forum (805601)

Promote farming for food security and for export.

**Summary of responses (including reasons) by Planning Authority:**

Mr George Barton (038878), Cockburn Association (037249), Damhead and District Community Council (039328), Esk Valley Trust (037349), Grange and Prestonfield Community Council (790304), Juniper Green Community Council (028859), Mrs Mirabelle Maslin (928549), Minto Hills Conservation Group (040607), North Berwick Community Council (035522), Roslin and Bilston Community Council (790524), South West Communities Forum (805601)

SESplan agrees that prime agricultural land plays an important role in food security. Scottish Planning Policy (SPP) paragraphs 79 and 80 (ASD06) are already clear about the nature of protection afforded to prime agricultural land and other grades of land. SESplan does not propose to repeat this.

The spatial strategy set out in Figure 3.1, page 13 focuses most new development in existing settlements, particularly in and around Edinburgh. This is deliberate because it locates the majority of people close to existing jobs, services, facilities and infrastructure. It is also designed to provide a variety of transport choices and reuse previously developed land and buildings. This approach increases the probability that a large share of new development will be accommodated on brownfield land.

Table 3.1 Placemaking Principles also contains a clear statement which promotes the resource efficient use of land to safeguard Prime Agricultural Land and other land important for food production and 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.'

Therefore the strategy already plans to accommodate the majority of development in locations that are not prime agricultural land. However, there is also a recognition that the scale, nature and distribution of brownfield land means that it will not be possible for all development in all locations to be on brownfield land. Given the importance of locating new development close to services and facilities it may not be possible to avoid development on at least some prime agricultural land. On balance the strategy inherently tries to minimise the loss of prime agricultural land.

Focusing purely on non-prime agricultural land that is outside of the largest settlements presents major challenges to the other objectives of the strategy.

This is because most of the non-prime agricultural land is concentrated to the south and west of the region on higher ground and / or further from the largest concentrations of jobs and services. Such a strategy would result in a pattern of development that requires lengthy commuting and the establishment of new or much enlarged settlements with significant new infrastructure requirements. The Proposed Plan is considered to represent the optimal way of minimising the often competing and sometime conflicting challenges described by paragraph 79 of SPP (ASD06).

Although food security is important SESplan is satisfied that it has appropriately balanced this with other challenges.

It is currently unclear what issues will be faced by the agricultural sector post 'Brexit' and what these might mean in practice for strategic planning. SESplan therefore has no comments on these matters.

Agricultural land as an economic asset for home and export use is not the definition of prime agricultural land set out in SPP.

**No modifications proposed.**

**Reporter's conclusions:**

[Note: For DPEA use only.]

**Reporter's recommendations:**

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