

Edinburgh Local Development Plan – Proposed Plan Representation Form

All Representations on the Proposed Plan should be submitted using this form.
Please use a separate form for each individual representation i.e. each aspect of the Proposed Plan you wish to comment on.

If you have any queries regarding your representation, please refer to the accompanying guidance note or contact 0131 469 3552

Representation forms must be received by 5pm on Friday 14 June 2013 and can be submitted electronically to; localdevelopmentplan@edinburgh.gov.uk or by post to; Local Development Plan Team, City of Edinburgh Council, Business Centre G.3, Waverley Court, 4 East Market Street, Edinburgh, EH8 8BG.					
Section 1. Please provide your contact details Please note that representations cannot be treated as confidential. Representations will be made available for public inspection, except any information which would be subject to the Data Protection Act 1998.					
Name:			Organisation Name:		
			Cammo Residents' Association		
Address:					
42 Cammo Grove, Edinburgh EH4 8EX					
Telephone:			Email:		
Agent: N/A					
Agent Address:					
N/A					
Agent telephone:			Agent Email:		
N/A			N/A		
Section 2. Please tell us which part or parts of the Proposed Plan this representation relates to:					
Page No.	Pg 50-52 Pg 92	Part and Section	Part 1 Section 5	Paragraph No.	Para 113 Para 180
Proposal Reference	HSG 20		Policy Reference	Policy HOU1	
Other	Figure 4 Edinburgh Green Belt Figure 5 Green Network Table 4 New Housing Proposals Environment Report				

Section 3. Please indicate whether you are seeking a change to the Proposed Plan (i.e. your representation is an objection) or if your representation supports the Proposed Plan as written

Seeking a change X (Please complete sections 4 and 5 below)

Support as written (Please complete section 5 below)

Section 4. Please indicate what changes you would like made to the Proposed Plan

Cammo Residents Association objects to the loss of Prime Agricultural Land associated with the development of HSG20 Cammo.

Prime Agricultural land is identified within the Councils Environmental Report and is a key component of the evaluation matrix and assessment of sites.

We object that greater weight has not been given to the Prime Agricultural Land designation derived from the Hutton Institute Maps for Scotland.

Section 5. Representation

Your representation should be no more than 2000 words. You should explain clearly and concisely your reasons for seeking a change to or supporting this aspect of the Proposed Plan. If you are attaching additional documents as part of your representation you must refer to these in this section of the form and include a summary of their content. Representations which simply state "see attached" or similar will not be accepted and will be returned.

Introduction

The Cammo proposal forms part of a viable and productive farm holding comprised wholly of Prime Agricultural Land. There is no requirement to satisfy this productive land for oversupply of housing within West Edinburgh.

Agricultural land is defined as 'being 1, 2 or 3.1 in the land capability classification for agriculture developed by Macauley Land Use Research Institute' (p.65). Land at Cammo is capable of supporting high yields and a wide variety of crops.

The proposal is contrary to Section 2 of the LDP: A Plan to Protect and Enhance the Environment as well as being contrary to Policies within Part 2 Section 3 Caring for the Environment. The loss of Prime agricultural Land adds to the unsustainability of the proposal (HSG20).

It is also contrary to SESplan objectives in relation to conserving the natural environment and sustainable development. Agricultural use is a key component of the Green Belt in this location and part of the rural character of the Cammo area.

In addition the re-designation of this land is contrary to the Land Use Plan for Scotland and Agricultural Policy.

The Proposed LDP

The proposed LDP has a raft of Environmental and Resource Policies. However it is silent on the issue of Prime Agricultural land. Supporting assessment in the Environmental Report identifies the whole of the Cammo Green Belt as Prime Agricultural land but is inconsistent in

its analysis and appraisal when combined with other factors.

The SDP (SEsplan)

Both the aims and Development principles within the SDP seek to conserve the natural environment and improve bio-diversity whilst minimising the loss of resources. The retention of Prime Agricultural Land is an obvious means of achieving this.

SPP (Feb 2010) Existing

The existing Government Planning Guidance seeks to protect Prime Agricultural Land;

Para 97:

'Prime quality agricultural land is a finite national resource. Development on prime agricultural land should not be permitted unless it is an essential component of the settlement strategy or is necessary to meet an established need, for example for major infrastructural development, where no other suitable site is available. Small scale development directly linked to rural businesses, including housing, may also be permitted. Renewable energy generation development or minerals extraction may be acceptable where restoration proposals will return the land to its former status. When forming the settlement strategy, planning authorities should consider the impact of various options on prime quality agricultural land and seek to minimise its loss.'

The latest statement of Scottish Government Policy re-enforces this position.

SPP Consultation Draft (May 2013)

In paragraph 69 it is stated that: 'Development on prime agricultural land should only be permitted in one of the following circumstances:

- Where it is an essential component of the settlement strategy or necessary to meet an established need, for example for essential infrastructure, where no other suitable site is available; or,
- For small-scale development directly linked to a rural business; or,
- For the generation of energy from a renewable source or the extraction of minerals where this accords with other policy objectives and there is provision for restoration to return the land to its former status.'

It is clear that the Cammo proposal does not meet any of these criteria and therefore should not be countenanced by the City Council's LDP. It is not an essential component of the settlement strategy nor does it meet an established need. A range of other suitable sites are available.

Conclusions

Reduction of the farm holding at Cammo is unsustainable. The land is intensively farmed and well managed as part of an extensive agricultural unit. Removal of the field at Cammo would significantly reduce the viability of adjoining land.

The LDP has not given sufficient weight to the objectives of the SDP or to Scottish Government Policy in this case. Nor has it had due regard for its own Environmental Report which we would like to see scrutinised at the Public Inquiry.

CRA objects to the loss of Prime Agricultural Land as being unsustainable and contrary to the interests of agricultural policy.