

[REDACTED]

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**From:** Pippa Robertson [REDACTED]  
**Sent:** 07 May 2019 16:07  
**To:** LDP  
**Subject:** MIR response  
**Attachments:** MIR response - food growing.pdf; MIR response - Garthdee Road site.pdf

Hi

I attach 2 responses to the consultation on the Main Issues Report for the next local development plan - one on food growing and one on the proposed allocation of land at Garthdee Road.

I'd be grateful if you could confirm safe receipt.

Thanks, and regards

Pippa

## **Aberdeen Local Development Plan Review**

### **Main Issues Report Consultation Response**

#### **Question 1 – New Housing Sites**

##### ***Do you agree with our preferred housing sites?***

No – I have concerns about the proposed allocation of B11/01, Garthdee Road, as set out in more detail below.

#### **Background**

Bid reference B11/01, Garthdee Road has been assessed as desirable for allocation in the next Local Development Plan for residential development of, indicatively, 20 houses. In doing this, the officers' assessment notes that the site is open space and that part of the site may be used for community planting/woodland, but indicates that development of this scale should allow the community planting elements to continue. However, development of any scale would still result in a significant loss of public green space, restricting both the potential for existing community growing uses to expand over time and the site's wider community value. As such, the proposed allocation runs contrary to local and national policy as set out below.

#### **Policy context**

##### ***Scottish Planning Policy (SPP)***

As a statement of Scottish Government policy and priorities, the content of SPP is a material consideration that carries significant weight and there is an expectation that development plans will comply with its terms. As demonstrated below, the allocation of this site for development would not achieve such compliance.

The proposed sites currently form part of the Aberdeen Green Belt, the purpose of which is set out in SPP as being to:

- direct development to the most appropriate locations and support regeneration;
- protect and enhance the character, landscape setting and identity of settlements; and
- protect and provide access to open space.

In this regard, the land Garthdee Road occupies an elevated position in relation to existing residential development to the north, such that any development here would be highly visible and have a significant landscape impact. At the same time, any level of development would result in a loss of access to open space, while doing nothing to support regeneration. As such, the proposed allocation would undermine the stated purposes of the green belt as set out above. Instead, in the interest of directing development to the most appropriate locations and protecting both the landscape setting and access to open space, the green belt designation should be retained.

At the same time, whether as part of the green belt or otherwise, SPP stresses the need to protect, enhance and promote green infrastructure (including open space), stating that local development plans should protect open space and, in particular, should encourage opportunities for a range of community growing spaces [paragraphs 222 – 227]. The proposed allocation of this site would be directly contrary to SPP in both these regards.

### **Aberdeen City Council Food Growing Strategy**

As required in terms of **the Community Empowerment (Scotland) Act 2015**, the Council is currently working on the preparation of a food growing strategy, with the Council's website currently stating that it is hoped to have this in place this year. At the same time, the Council's website also makes it clear that this strategy forms just part of a movement to encourage a healthy relationship to local food which is accessible to all, and which is good for both people and planet. Any proposals for residential development on a site that is currently being used for food growing runs directly contrary to the Council's stated intentions in this regard.

### **Aberdeen City Council Open Space Strategy**

The main purpose of the Council's open space strategy is to ensure that the city has enough accessible and good quality open space, with the Airyhall/Broomhill/Garthdee ward identified within this as having the fourth lowest levels of open space provision in the city (out of 13 wards in total). Against this background, any proposal to further reduce the amount of open space available within this ward is wholly unjustified.

### **Other considerations**

As well as the proposed allocation being contrary to regional and national policy, this also raises a number of other concerns which means it should not be considered appropriate for inclusion in the new Local Development Plan. These are discussed below.

**Exposure and Landscape fit** – As noted above, the site occupies an elevated position in relation to existing residential development to the north, such that any development here would be highly exposed and visible in the landscape. As such, the positive scores given on both these criteria in the officers' assessment are not justified.

**Land use mix and conflict** - while the officers' assessment notes that the site is currently open green space serving residents in the area, the site is still given a score of 2 in this regard. This score does not however reflect the clear conflict between the site's use as open green space and any level of residential development. Likewise, in reducing the provision of open space in the area in favour of increased residential development, the proposed allocation would have a negative effect on the land use mix in the area, and this should also be reflected in a lower score against this criterion.

**Education capacity** – as noted in the officers' assessment, both Kaimhill Primary School and Harlaw Academy are currently over capacity and projected to continue to be so as far forwards as current forecasts look. With nothing to indicate how these capacity issues might be addressed, further residential development in this area should not be considered appropriate at this time.

**Deliverability** - The Council's initial call for sites expressly stated that sites should be deliverable, however the information submitted with bid reference B11/01 indicates that no developer is currently on board, such that there is no immediate prospect of this site being built out. Instead, this would appear to be a purely speculative bid intended to maximise the value of land rather than with immediate view to actually deliver housing here. As such, this site should not be considered to meet the Council's criteria for potential development sites.

## **Conclusion**

For the reasons set out above, the proposed allocation of bid reference B11/01 would be contrary to Scottish Planning Policy as well as the Council's own open space strategy, emerging food growing strategy and stated criteria for potential development sites. Instead, the site should be retained as greenbelt and protected for future community use.

## Aberdeen Local Development Plan Review

### Main Issues Report Consultation Response

#### Question 18 – Food Growing

##### *How can the Local Development Plan support the delivery of food growing projects in the City?*

I believe that the Local Development Plan should identify and designate food growing sites (including potential future food growing sites) in order to protect these from alternative development proposals.

##### *Do you think food growing should be included in the next Local Development Plan by way of a new policy, or through existing policy and guidance?*

Yes. If food growing is genuinely to be supported through the Local Development Plan, then this requires sites to be identified in the Local Development Plan as proposed above, and also specific policies to both protect existing food growing spaces and promote the creation of new ones, further details on which are set out below.

#### **Policy context**

Having started work on the preparation of a **food growing strategy** (as required under **the Community Empowerment (Scotland) Act 2015**), the Council's website currently says that it is hoped to have this in place this year. At the same time, the Council's website also makes it clear that this strategy forms just part of a movement to encourage a healthy relationship to local food which is accessible to all, and which is good for both people and planet. If this movement is to be successful however, it is imperative that land use planning also forms part of it, with the Local Development Plan playing a key role in identifying and designating food growing sites, with specific policies to both protect existing sites and promote the creation of new ones.

Likewise, **Scottish Planning Policy 2014 (SPP)** expressly states at paragraph 227 that, as well as safeguarding existing and potential allotment sites, Plans should encourage opportunities for a range of community growing spaces. As a statement of Scottish Government policy and priorities, the content of SPP is a material consideration that carries significant weight and there is an expectation that development plans will comply with its terms. To do anything other than to include food growing in the next Local Development Plan would be contrary to SPP and the expectation that plans will comply with it.


In order to comply with SPP and deliver the Council's stated aspirations in terms of encouraging a healthy relationship to local food which is accessible to all, the following policy changes should be made in the new Local Development Plan:

- Policy NE3 should be revised such that all forms of local food and community growing spaces are expressly referred to in the definition of urban green spaces that are to be protected from re-development, including (but not necessarily limited to) community gardens and woodlands, city farms, orchards, and roof gardens, as well as allotments.
- Policy NE4 should be revised to include an express requirement for food or other community growing spaces to be provided as part of all new development, with various ways in which this could be done depending on the type of development involved. For example, some developments could provide serviced land for allotments or community growing projects, while others could be designed such that roof areas are available for growing. Or, where appropriate, financial contributions could be made towards off-site growing projects in the area. For the avoidance of doubt, this should apply to all types of development, not just residential.
- A new policy should be introduced into the LDP which expressly supports proposals for the creation of new allotments and other food and community growing projects, as well as the infrastructure required to support these (subject always to other policies). On this, inspiration can be taken from a number of local authorities in England in Wales, in particular:
  - **Brighton and Hove City** - The [Brighton and Hove City Plan Part 1](#), adopted March 2016, specifically supports local food growing initiatives as part of their policy to create and maintain sustainable neighbourhoods. In turn, all developments are expected to demonstrate how they will encourage food growing, and the council is committed to recognising, safeguarding and encouraging the role of allotments, garden plots within developments, small scale agriculture, and farmers markets in providing access to healthy, affordable locally produced food options.

This is supported by a [Food Growing Planning Advice Note](#), which provides technical input and inspiration on how food growing can be incorporated into proposals for new development.

- **Monmouthshire** – the Monmouthshire Local Development Plan, adopted February 2014, is supported by Supplementary Planning Guidance on Green Infrastructure which expressly recognises a wide range of growing projects as examples of Green Infrastructure Assets (namely allotments, community gardens, city farms, orchards, roof gardens and urban edge farmland), and expressly identifies local food growing as one of Green Infrastructure's functions as identified below.

**GI Function local food production**



*'An estimated 33% of people already grow or intend to grow their own vegetables.'*  
UK National Food 2030 Strategy (DEFRA, 2010)

**GI Benefits**

- £ **Economic** Can help to strengthen the local economy by supporting local retailers, growers and producers and can contribute to the creation of attractive places to live, work and visit.
- 🌿 **Environmental** Contributes to sustainable food production and consumption and a reduction in food miles. Also provides valuable habitats for wildlife.
- 👥 **Social** Helps community spirit and offers opportunities for socialising, learning and health improvements.

**Key design considerations**

- Does the scheme meet adopted minimum standards for allotment provision?
- Have adequately sized rear gardens been provided to allow small-scale domestic food production?
- Do the proposals for the site make best use of off-site places nearby where the production of food can take place and is this close to where people will live?
- What opportunity is there to combine food production with other GI functions such as energy production, access and recreation?
- What is the potential for community orchards, city/school farms and other edible landscapes such as hedgerows to be incorporated into the scheme?
- Has the use of livestock been considered to reduce/maintain management costs within the GI network?
- Has a site-wide composting strategy for garden and food waste been developed? Garden and food waste can be utilised as compost for allotments and renewable energy production.
- What opportunities are there to explore the potential for locally grown food to be used by local schools and other community facilities? Have opportunities for community food growing been looked at?

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All development proposals are then expected to map existing Green Infrastructure in and around the site, consider how the development can contribute to local needs and opportunities, and then incorporate proposals the maintain, protect and enhance Green Infrastructure into the development. As an example of this, it is stated that:

*“The cost and scale of GI provision incorporated into a scheme should reflect the scale and type of development proposed. For example, a major housing development scheme could include the provision of extensive sustainable drainage systems, food production areas and a large proportion of accessible green space. Smaller developments on the scale of a single dwelling could contribute by providing a green roof, a garden or bird/bat nesting boxes.”*

These examples, and many more, show the potential for local food growing to be championed through the Development Plan, and there is no reason why a similar approach cannot be taken in Aberdeen.

- Finally, in preparing the emerging LDP, the Council should actively be seeking to identify significantly more land which could be allocated for community growing uses (including, but not exclusively, allotments), to tie in with the work that is currently being done on the preparation of a food growing strategy for the city.