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East Lothian Council

Additional information:

MAIN ISSUES REPORT PART 1

The attached document should be read in conjunction with the report to the meeting of East Lothian Council on 28 October 2014 entitled East Lothian Local Development Plan Main Issues Report and Consultation Arrangement

Authorised By	Monica Patterson
Designation	Depute Chief Executive, Partnership
Date	16/10/14

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local development plan
main issues
report 2014

DRAFT FOR COUNCIL 28/10/14

The Main Issues Report sets out the options for the Local Development Plan



The Interim Environmental Report assesses the options identified in the Main Issues Report

Appendices 4-9 assess potential development sites in each part of East Lothian



The Monitoring Statement provides an evidence base for the Main Issues Report



Access all the Main Issues Report documents and other information at www.eastlothian.gov.uk/ldp

The Transport Appraisal assesses transport implications of the Main Issues Report

Foreword

To be added for published consultation version



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1 Introduction

The Development Plan

- 1.1 This Main Issues Report (MIR) is the first formal stage in the preparation of the East Lothian Local Development Plan (LDP). Once approved, the LDP will form part of the statutory Development Plan for East Lothian. The other part of the Development Plan will be the higher level Strategic Development Plan (SDP) for Edinburgh and South East Scotland, which is prepared by SESplan¹.
- 1.2 All applications for planning permission are assessed against the Development Plan. It provides a framework against which proposed changes in the use of land and buildings can be assessed. It shows where proposals for new development such as housing, business and retail will be supported and where they will not. The Development Plan should be reviewed at least every five years to update the planning policy and strategy approach and to find appropriate additional land for new development.
- 1.3 The Development Plan for East Lothian currently comprises *The Strategic Development Plan for Edinburgh and South East Scotland (SDP)*, read together with *The East Lothian Local Plan 2008 (ELLP2008)*. The SDP sets out the strategic planning requirements for an area comprising the City of Edinburgh, East Lothian, Midlothian, West Lothian and Scottish Borders Council areas, and the southern part of Fife Council area. The ELLP2008 was prepared by East Lothian Council and it provides more detailed and site-specific planning policy for its area. However, the ELLP2008 was prepared under a previous strategic plan, the Edinburgh and the Lothians Structure Plan 2015, which Scottish Ministers have now replaced with the new SDP.
- 1.4 Recent changes in Scottish planning legislation and policy required the former Edinburgh and the Lothians Structure Plan 2015 to be replaced by the SDP. These same changes require the ELLP2008 to be replaced by a new Local Development Plan (LDP) for East Lothian. The new Local Development Plan for East Lothian must by law conform to the SDP, including providing for its development requirements and complying with its high level spatial strategy and planning policies.

¹ Strategic Development Plan (June 2013) prepared by the Strategic Development Planning Authority for Edinburgh and South East Scotland (SESplan) and approved by Scottish Ministers by letter dated 27 June 2013

Main Issues Report Purpose

- 1.5 The MIR provides the basis for public consultation on the preparation of the LDP as required by the Town and Country Planning (Scotland) Act 1997 (as amended). The MIR sets out the Council's potential proposals for development in East Lothian, including where new development should and should not occur, and other approaches which are a reasonable alternative (or alternatives) to these. It also highlights the ways in which these emerging preferred and alternative proposals differ from those of the ELLP2008. In addition, it reviews the policies of the current ELLP2008 and considers if they remain valid for inclusion the LDP, if any change in approach should be considered or if new policies should be introduced.
- 1.6 The MIR is not a draft of the LDP; rather it focuses on key changes and the big ideas for future development taking in to account the environmental and infrastructure opportunities and constraints in the area. A main challenge will be how the LDP can align its development proposals with available infrastructure capacity / ability to provide additional infrastructure capacity and with the funding and delivery solutions that will be required to allow new development to take place. The purpose of this MIR is to stimulate discussion and seek opinion on what should and should not be included in the LDP. The feedback from the consultation on the MIR will be taken in to account as the Council finalises its Proposed LDP (see paragraph 1.11).
- 1.7 The MIR focuses on where there is a need and opportunity for the LDP to change the development strategy and policies of the current ELLP2008, where there is a genuine choice so to do. However, where a certain course of action must be followed, or where no change is necessary from the current local plan, or where there will be no significant environmental or other effect of a proposed change, this is identified but with limited discussion. In relation to potential minor policy changes, these are discussed in the Monitoring Statement which is published alongside this MIR. The potential minor policy changes are also listed at Appendix 6 of this MIR.

Supporting Documents

- 1.8 The Council has published two primary supporting documents with the MIR. The primary documents are the Monitoring Statement (MS) and the Interim Environmental Report (IER). The MS is a key part of the evidence base for the LDP, and the IER has been prepared in line with the Environmental Assessment (Scotland) Act 2009.
- 1.9 The MIR has been prepared in parallel with these supporting documents and to ensure it remains focused, cross references are made between them where appropriate. As well as finalised versions of these supporting documents, the Proposed LDP will be accompanied by an Action Programme. It will set out what actions are needed to deliver the plan, and this will be kept under review at least every two years from the point the LDP is adopted.

Consultation

1.10 The MIR is published for formal consultation. This will last for 12 weeks from **Monday 17th November 2014** until **Sunday 8th February 2015**. To secure efficient use of resources the Council is keen to promote electronic working wherever possible. **It strongly encourages comments on the MIR to be submitted online via the Council's Consultation Hub**, the address for which is provided below. If you are unable to respond in this way you may email or write to the other relevant addresses provided below. **The online consultation will automatically close at 23.59 on Sunday 8th February 2015**. To allow for delivery timescales, any hard copy responses will be accepted until noon on Monday 9th February 2015.

Consultation Hub:	www.eastlothianconsultations.co.uk
Email:	ldp@eastlothian.gov.uk
Written Responses:	Policy & Projects Development Partnerships and Services for Communities East Lothian Council John Muir House Haddington EH41 3HA

Next Steps

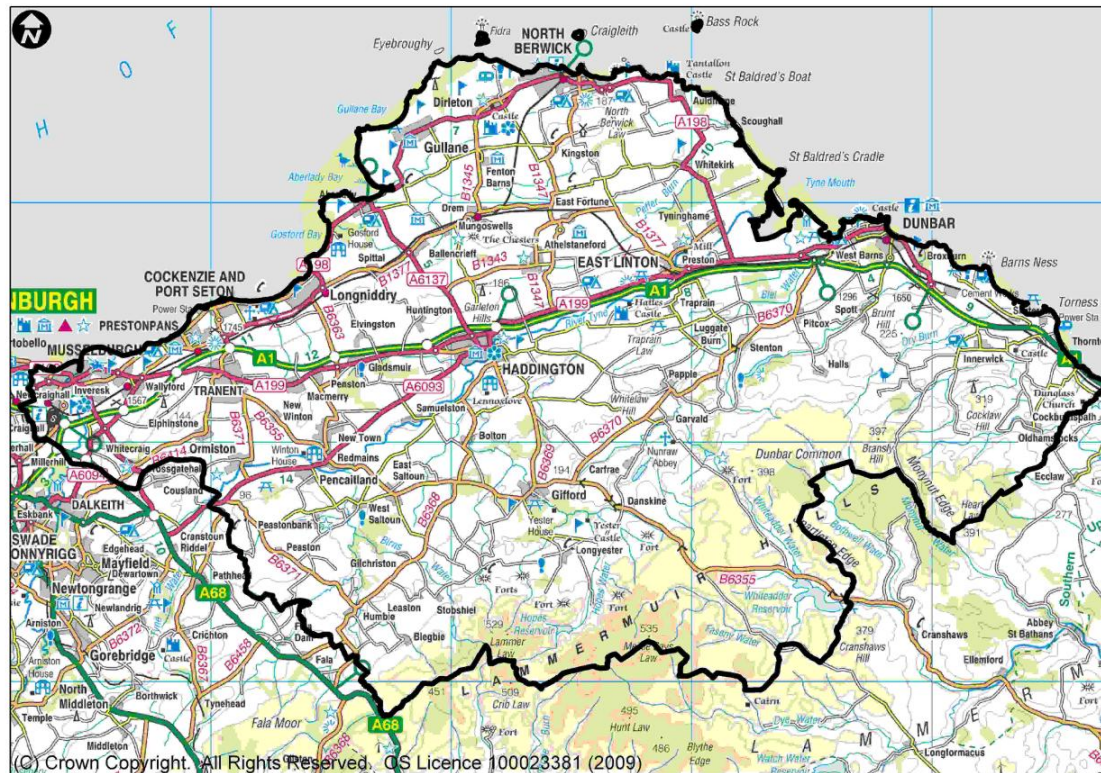
1.11 The Council will consider responses submitted within the above consultation period, prior to preparing the Proposed LDP. The Proposed Plan will confirm the Council's settled view on the overall spatial strategy for development in East Lothian as well as the planning policies and proposals to facilitate delivery and guide future development in the area. The Proposed LDP will be published for formal representations. If there are unresolved representations, then the issues they raise will be considered at the Proposed LDPs Examination by a Reporter from the Scottish Government's Directorate for Planning and Environmental Appeals. The Reporter's recommendations on the representations considered at the Examination will be largely binding on the Council². The Proposed LDP, incorporating any recommendations as appropriate, will then be adopted by East Lothian Council, at which time the East Lothian Local Development Plan will formally replace the East Lothian Local Plan 2008.

²Scottish Government Circular 6/2013 paragraph 92

2 East Lothian: The Place

Spatial Context

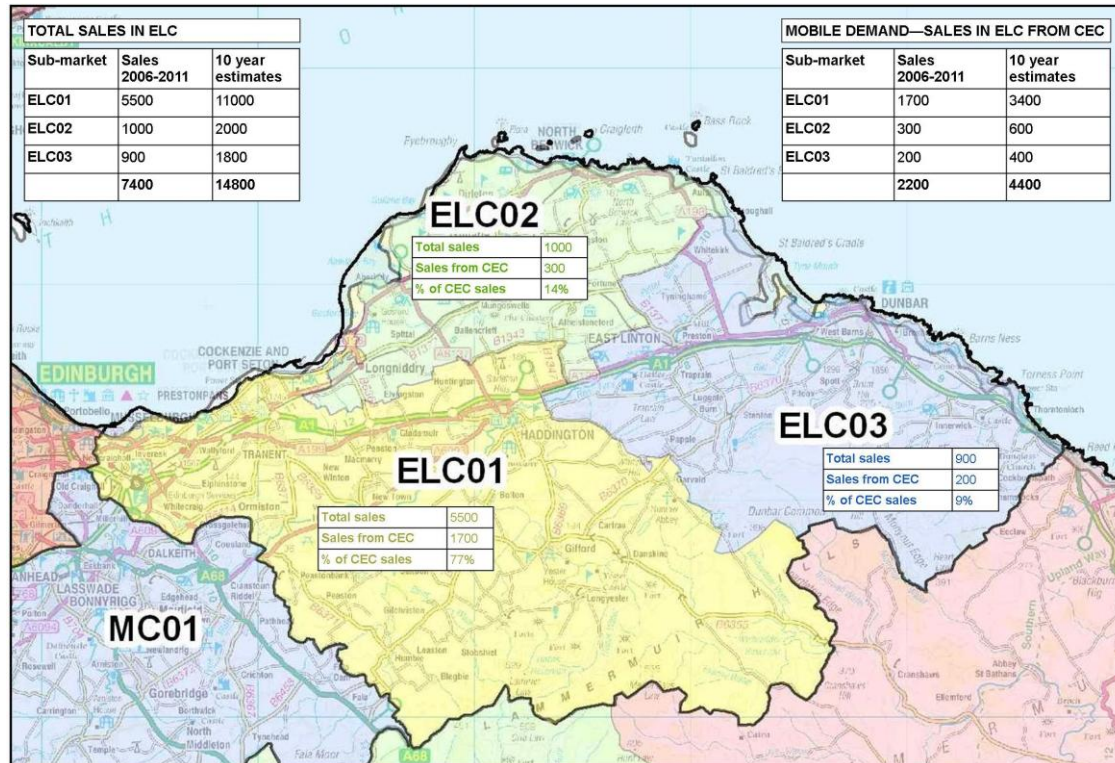
- 2.1 East Lothian is within the Edinburgh city region, which also includes the council areas of Edinburgh, West Lothian, Midlothian, Scottish Borders and the southern part of the Fife council area. East Lothian is located to the east of Edinburgh's suburban edge. It measures approximately 270 square miles in area, and includes 43 miles of coastline. East Lothian has six main towns and extends from Musselburgh in the west to Dunbar and beyond to the area's administrative boundary with Scottish Borders in the east. To the south are the Lammermuir Hills and to the west are the Midlothian and City of Edinburgh council areas. The Firth of Forth and East Lothian's attractive coastline are to the north.
- 2.2 East Lothian contains a wide variety of landscape types, cultural and natural heritage assets as well as historic towns and villages. It also has a significant amount of prime quality agricultural land. The area's economy was built on agriculture, fishing, coal mining and manufacturing. Today, all of East Lothian is within Edinburgh's wider travel to work area. Although East Lothian is a firm part of Edinburgh's labour market area, its local economy has also diversified. The main employment sectors are in education, public administration, health and manufacturing. Primary industries such as agriculture and fishing remain important and tertiary industries, such as construction, biotechnology, food and drink and the service sector, including finance and retailing, have also developed. Tourism is also a significant contributor to the local economy and continues to grow in importance. The establishment of Queen Margaret University to the west of Musselburgh is a real asset in the area and associated spin off opportunities are emerging. Edinburgh College also has an aspiration to establish a presence in East Lothian.
- 2.3 The 2011 Census indicates that Musselburgh is East Lothian's largest settlement (pop. 19,133 (incl Wallyford 22,264)). Although closest to the city Musselburgh had the slowest rate of population growth (7%) between 2001 and 2011 in comparison to the rest of East Lothian (10.7%). The other main settlements in the west of East Lothian are Tranent (11,565), Prestonpans (9,140) and Cockenzie / Port Seton (5,545). The Edinburgh Green Belt extends eastwards from Musselburgh up to the western edges of Tranent and Prestonpans and surrounds Wallyford, Whitecraig and Old Craighall. The western part of East Lothian contains more than half of East Lothian's population. The west of East Lothian is the most accessible part of the area and is also where there is most regeneration potential. The principal towns further east are Haddington (8,978), Dunbar (8,293) and North Berwick (6,455). The settlement pattern in the east is more dispersed than in the west and there are few regeneration opportunities. Although Musselburgh is the largest town, Haddington is East Lothian's administrative centre.



2.4 East Lothian is also part of the wider Edinburgh housing market area; however, East Lothian has 3 sub-housing market areas of its own³. These are 1) Musselburgh to Haddington in the west; 2) Dunbar and surroundings in the east; and 3) North Berwick and coastal settlements to the north. In the five years between 2006 -2011 a total of around 7,500 house sales took place in East Lothian. Approximately 70% of these sales occurred in the western sub-market area alone. Additionally, around 75% of all purchasers moving from Edinburgh to East Lothian (mobile demand) bought a home in the western sub-market area. In the same period around 15% of house sales in East Lothian occurred in each of the North Berwick and coastal

³ SESplan Housing Market Area Assessment October 2013

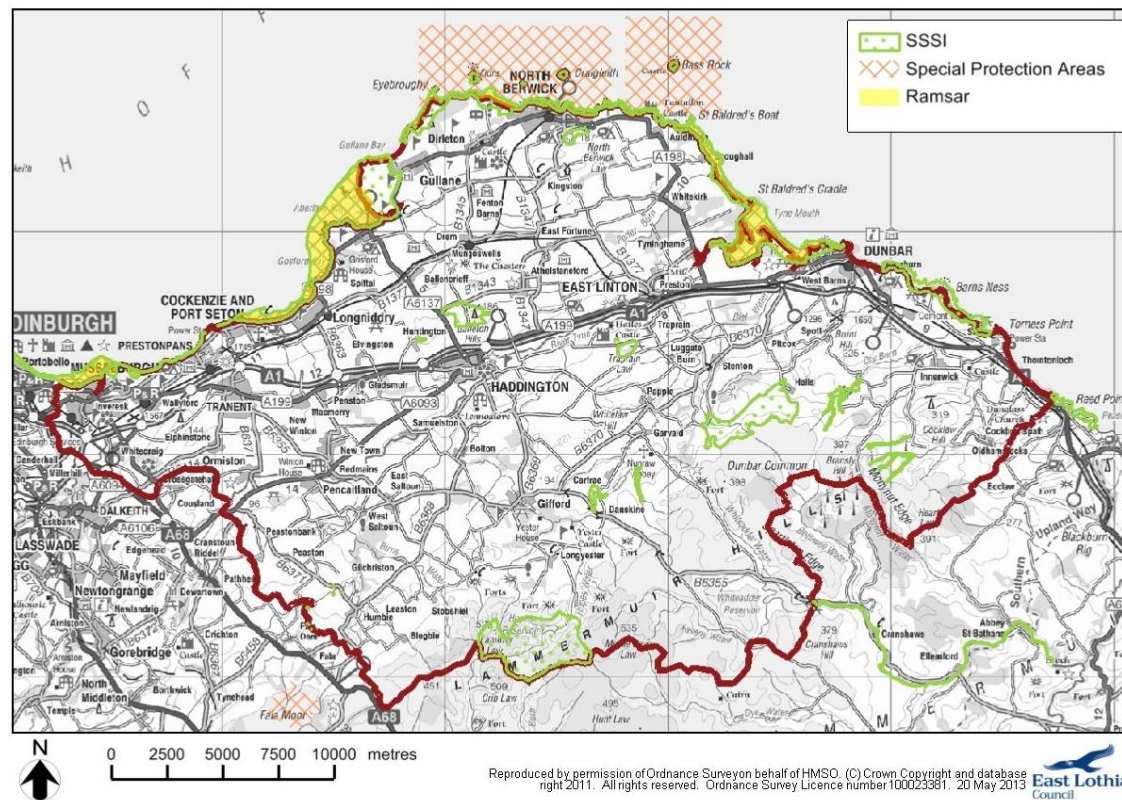
settlements and Dunbar and surroundings sub-market areas. The scale of mobile demand from Edinburgh moving to the eastern and northern sub-market areas is significantly less than in the west, representing around 15% and 10% of all house sales in those sub-market areas respectively.



2.5 East Lothian’s main towns provide the widest range of local services, facilities and employment opportunities in the area and are service hubs for the smaller settlements around them. The A1 (T) and East Coast Main Line directly connect the main towns in the west as well as Haddington and Dunbar to the rest of the city region and beyond, including via public transport. While North Berwick benefits from its branch railway line, it is not as well connected via the strategic road network and via bus based public transport. The wider range of jobs, services and facilities available in other parts of the city region are also closer to the main towns in the west of East Lothian, meaning less distance need be travelled between them.

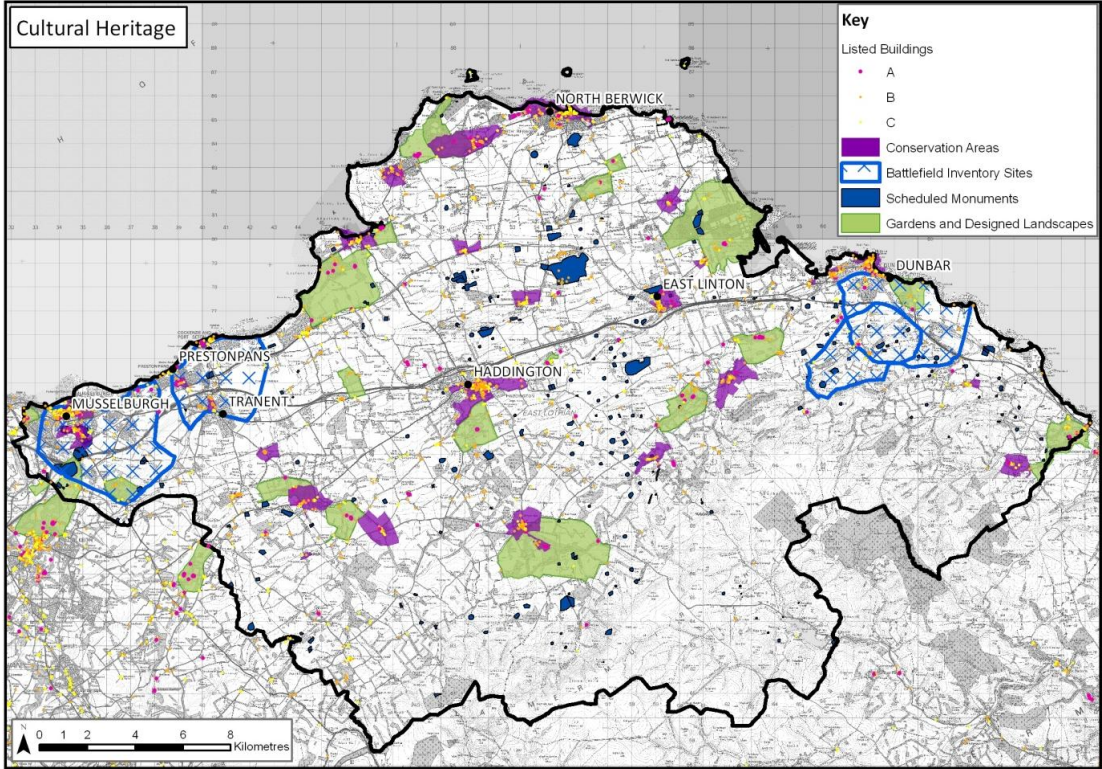
Landscape, Cultural & Natural Heritage

- 2.6 East Lothian is an area of varied and attractive landscape character comprising countryside and coast with a central agricultural plain framed by the backdrop of the Lammermuir Hills. This landscape is interspersed with historic towns and villages as well as prominent physical features such as the Garleton Hills and North Berwick and Traprain Laws as well as designed landscapes and other historical sites, buildings, landmarks and monuments. The A1 (T) Trunk Road and the East Coast Main Line pass west to east through the centre of the area with the North Berwick branch line to the north.



- 2.7 The Tyne and Esk rivers and smaller isolated water courses drain the area. Aberlady, Gullane and Belhaven Bays, together with the beaches along the coastal strip, are landscape features that provide important amenity as well as visitor and leisure tourism attractions. They are also significant habitat resources for protected species and biodiversity of national and international significance. The Firth of Forth shoreline and islands are Special Protection Areas (SPAs), and the inland area to the south is an important feeding ground for protected species. There are also many Sites of Special Scientific Interest (SSSIs), numerous local wildlife sites and other areas of biodiversity value.
- 2.8 The main water courses and the Biel Water have a history of flooding of both agricultural and non-agricultural land. While the quality of the water environment in East Lothian is generally good, there are some locations where there is scope for improvement, particularly as a consequence of agricultural run-off. Much of the agricultural land is prime quality, and there are also carbon rich and rare soils such as peat in the area. The landscape is predominately one of large and generally flat fields that provide long distance views across the countryside and coastal plain and its landmarks to the Firth of Forth and beyond. Retaining a setting for settlements and ensuring appropriate edge treatment has helped maintain landscape character and identity. The Edinburgh Green Belt has a role in managing this in the west of East Lothian. However, some areas of green belt land have been identified as making a more limited contribution to green belt objectives and parts of it are also highly accessible by a range of transport modes.
- 2.9 Due to its topography, East Lothian was a historic invasion route from the north of England. As a result there are many historic battle sites, encampments, castles and fortifications in the area. Some of these reflect periods of significance in European and Scottish history as well as phases of technological military advancement. East Lothian also played a key role during World Wars I and II through its wartime airfields at East Fortune, Macmerry and Drem. East Lothian's more recent history of agricultural improvement left a legacy of fine rural buildings and a cultivated landscape. Most of the industrial landscape scars from mining in the western coal field have been remediated. East Lothian's settlements established and have grown and evolved in this context, whether because of harbours or minerals or the quality of agriculture. Other settlements located at river crossings or where fast moving water offered energy for industry. Often, smaller settlements developed around farmsteads, fortifications, parish churches and manses, while some were planned by estate managers to house farm workers during agricultural improvement. Roads and railways including several branch lines were introduced to connect the area to market, although only the North Berwick branch line remains.
- 2.10 The diversity of settlements in East Lothian developed either in harmony with their surroundings or in response to the area's economic activities and connections to the areas around it. This is reflected in the layout of East Lothian's settlements, their architectural styles and in the indigenous materials used for building. Some buildings have fallen into disuse and planning policy has encouraged them to be converted to new uses, and so retaining and enhancing the quality of the local landscape rather than allowing them to be replaced with new buildings. Many large estates remain intact with their designed landscapes, fine houses, gateways, boundary stone walls and planting, and they continue to be important landscape

features. There are few locations where further landscape improvement would be beneficial, with most areas of previous mining activity rehabilitated. The network of former railway routes is included as part of the area’s core path network and they offer access and active travel opportunities for residents and visitors alike through the countryside and green belt.



2.11 East Lothian has a high proportion of designated cultural heritage including listed buildings, conservation areas, scheduled and unscheduled archaeology, designed landscapes and historic battlefields. These characteristics and built and natural heritage assets are all integral to East Lothian’s sense of place, distinctiveness and identity, as well as its desirability as a high quality place to live, do business, work, for recreation and to visit.

Population & Households

2.12 The 2011 Census indicates that East Lothian's total usually resident population was 99,717, an increase of 10.7% per cent over the equivalent 90,100 figure at 2001. This confirms a trend of steadily increasing population that has been evident since the mid/late 1980's. The population of East Lothian accounts for 1.9 per cent of the total population of Scotland (5,295,403).

	0-4	5-14	15-24	25-44	44-64	65-74	75+
East Lothian	5.9	11.5	11.8	24.4	28.6	9.5	8.3
Scotland	5.5	10.6	13.1	26.5	27.5	9.1	7.7

Source: 2011 Census

2.13 The National Records of Scotland 2010 population projection (published 2012) anticipates that by 2035 East Lothian's population is projected to increase by 33% to around 129,229, the highest percentage rate of growth in Scotland during this period. Around 30% of this is expected to be natural change, whereas 70% is expected to be net in-migration. This is largely as a result of the area's proximity to Edinburgh and because it is part of the wider Edinburgh Housing Market Area. East Lothian is expected to experience the greatest increase in the 0-15 age group in Scotland, with an increase of 38%. East Lothian's working age population is also expected to increase at the highest rate in Scotland, with growth of 29%. The pensionable age population is expected to increase by 43%, and the number of people aged over 75 is expected to increase by 95%. The population is projected to grow across all age groups and this will increase demand for infrastructure, facilities and services in East Lothian, such as education, road, rail and transport links, including public transport, and health care, etc.

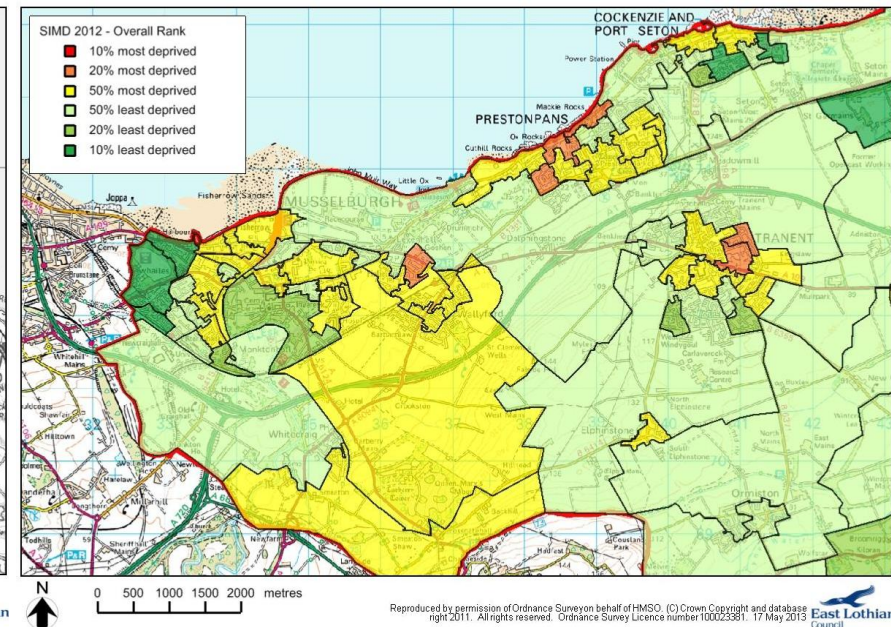
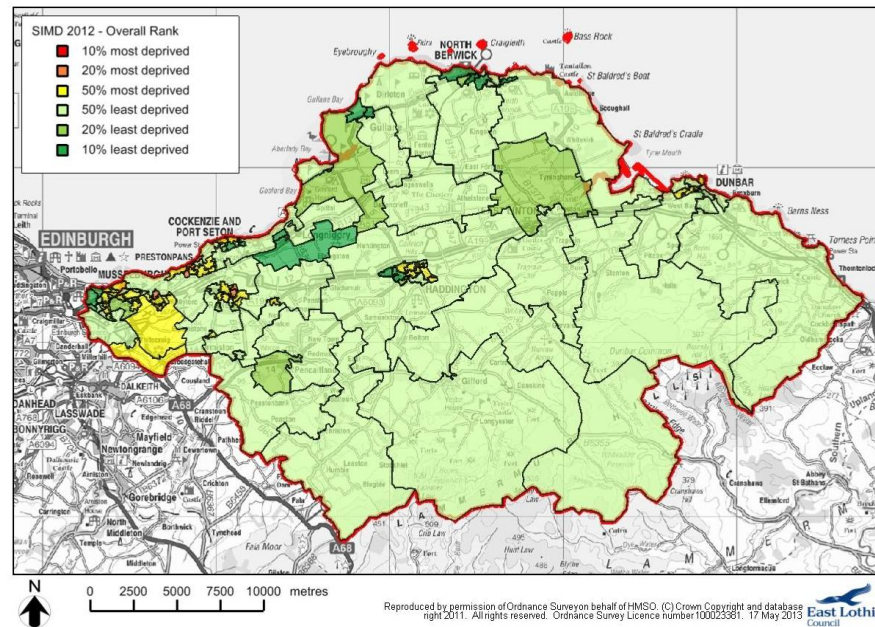
2.14 The 2011 Census indicates that in East Lothian there are 42,910 households. Compared with the Scottish average, East Lothian has a significantly smaller proportion of single person households but a greater proportion in all others. Yet the 2010 household projection indicates that by 2035 there will be a 70% increase in single person households in East Lothian, with 33% of households being single person, 7% being one adult with one or more children, 33% being two adult with two or more children, 21% being two or more adults with one or more children and 7% with 3 or more adults.

	1 person	2 person	3 person	4 person	5+ person
East Lothian	30.6	35.4	15.7	13.4	4.9
Scotland	34.7	34.0	15.1	11.5	4.7

Source: 2011 Census

Socio Economic Profile

2.15 The Annual Business Inquiry shows that between 1998 and 2008 the area experienced growth in the service, construction and tourism sectors, but a decline in manufacturing. Between 2008 and 2012 the Annual Business Survey (updated August 2014) indicated there has been increased activity in manufacturing (+4.5%), wholesale and retail trade (+8.4%) and in the tourism sector. Importantly, there has also been a significant decline in construction over the same period (-35%). Out of work benefits issued in the area (Job Seekers Allowance) at 2010 stood at 3.3%, below the Scottish average of 4.3%. The 2006 claimant count also showed that the area had a low unemployment rate at 1.7% and ranked 28th out of Scotland's 32 local authority areas at that time, but by 2011 this figure increased to 4.1% and was ranked 17th among them.



- 2.16** Educationally, 81% of the population has NVQ1 level and above (Scotland 80%), and 32% has NVQ4 and above (Scotland 35%). Of the working age population 61,200 (78%) are economically active (Scotland 62%)⁴. The split of full time (65%) and part time (35%) employee jobs (excl self-employed, HM Forces, government and trainees) is generally consistent with Scotland as a whole. The same applies to the positions held, of which 40% were managerial, professional and technical, 24% were administrative, skilled trades and secretarial occupations, 17% were personal services, sales or customer services occupations, and 19% were machine operatives, etc. Based on 2009 data, the Scottish Indices of Multiple Deprivation (SIMD) shows parts of Musselburgh, Prestonpans, Tranent and Haddington as among the most deprived 15% in Scotland in relation to one or more of the SIMD indicators of education, health, housing, crime, income or employment.
- 2.17** At 2009, around 30,000 jobs were available in East Lothian (for around 60,000 people of working age), resulting in a job density of 0.5, compared to the Scottish and GB average of 0.78. In comparison to other parts of the city region in terms of relative accessibility via national and international modes of transport, East Lothian has been a less preferential location for attracting large scale economic development / employment opportunities despite the allocation of land for business and employment use. The 2011 Census indicated that of the 48,579 people aged 16 -74 in employment around 28,855 of them commute to work via car, van or motor cycle (around 31,000 at the 2001 Census). At 2010, 21,700 (50.5%) of 16 – 64 year olds in employment lived and worked in East Lothian, with 21,000 people (48.8%) commuting out of the area for employment⁵; around 5,300 people commute into the area for work. This demonstrates the link between the size of the working age population, the availability of jobs in the area (job density) the commuting travel pattern and the capacity issues in the transport network.
- 2.18** While East Lothian has a qualified labour force across all sectors, there are pockets of deprivation. There is a mismatch between the size of the labour force and the availability of jobs in the area, resulting in increasing out-commuting. Recent economic conditions have also increased unemployment.

Transport Network & Services

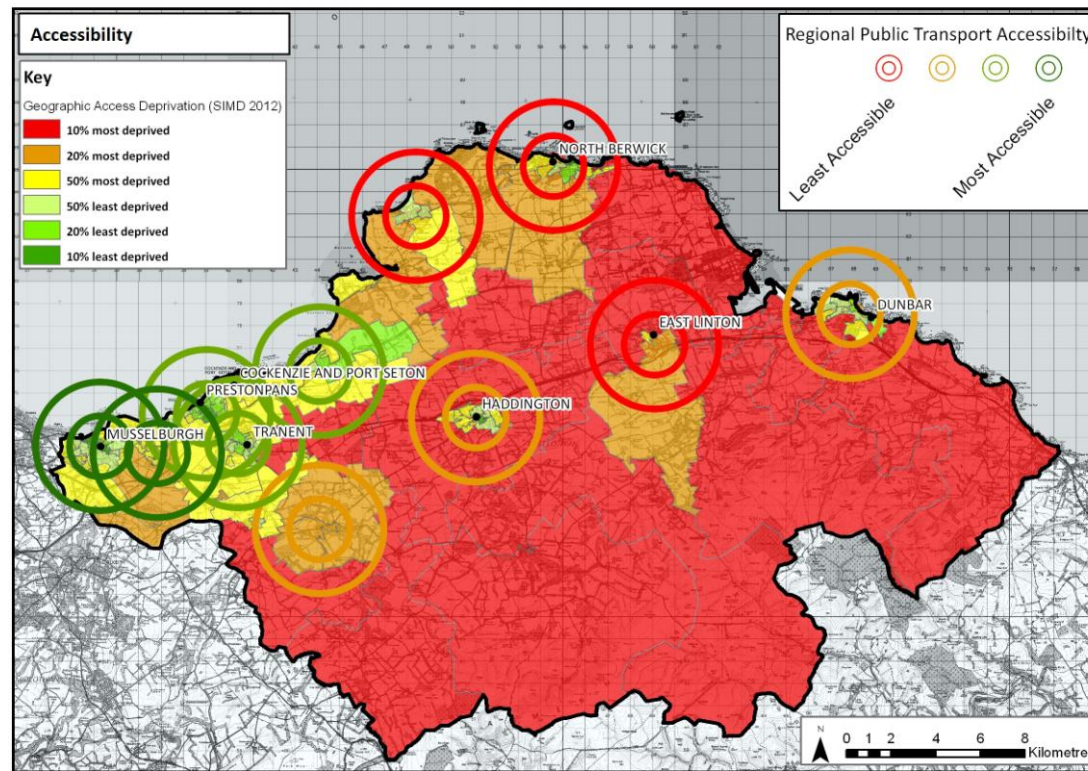
- 2.19** Alongside East Lothian’s landscape characteristics and its cultural and natural heritage assets is the infrastructure that supports its resident’s way of life and how visitors access and use the area. The A1, the East Coast Main Line and the North Berwick Branch Line are the main transport corridors. The A1 has a junction with the A720 Edinburgh City Bypass at Old Craighall and a number of interchanges along its length that provide access to settlements, other destinations and routes. The A1 has also been improved with dualling of the A1 Expressway between Haddington and Dunbar,

⁴ Office for National Statistics Annual Business Inquiry 2008

⁵ Annual Population Survey 2010: Local Area Labour Markets in Scotland (Part 4 Table 1.4)

which has increased accessibility and reduced journey times for road based transport. However, more could be done to improve cross border connections, including dualling the A1 to the Scotland – England border; consideration is being given to duelling the A1 south of the Scottish border.

2.20 While East Lothian is relatively well served by the strategic transport network, particularly west / east, the west of the area is the most accessible. However, there is an underlying problem of lack of capacity in transport infrastructure and in local transport services, particularly those extending to the north and south. These factors are particularly relevant in view of anticipated population growth and because travel demand is expected to increase in the coming years, issues that will exist without factoring the impacts of planned growth that is yet to be delivered.



- 2.21 Trunk road and local road network capacity is already an acute problem, particularly in the west of East Lothian. Existing constraints have been highlighted on the A1 (T), in particular at Old Craighall Junction and generally at all interchanges west of the Gladsmuir Interchange. Transport Scotland is of the view that these capacity constraints alone will constrain any further development from being delivered in the area until solutions are found and are committed to be put in place. It is currently conducting a regional study to establish these solutions. However, funding and delivery mechanisms need to be identified and it is expected that developer contributions will have a significant role to play. It is anticipated that the findings of the regional study and others will inform the LDP on trunk road and local road network interventions and the need for developer contributions.
- 2.22 The capacity of Old Craighall junction is a particular issue which has the potential to impact on road safety in future. Transport Scotland has indicated that all improvements to the trunk road must be secured and that no development should commence until such time as an agreed funding mechanism or full funding is in place for as yet to be fully designed and costed projects. While Transport Scotland has suggested it would be willing to allow some development to come forward in advance of any interventions being completed, this is on the proviso that it can be satisfied there is a funding mechanism in place that would allow capacity constraints to be overcome in the future as a result of the cumulative impact of development. Confirmation on the nature and costs of required trunk road and local road network interventions, the mechanism by which developer contributions may be gathered and the organisation(s) that will have responsibility for collecting these shall need to be clarified for the Proposed LDP.
- 2.23 The rail network through East Lothian currently has limited capacity with utilisation of the East Coast Main Line affecting scheduling for local services on it as well as those from the North Berwick Branch Line. Any confirmed longer term vision for high speed rail connections on other lines may release capacity on the East Coast Main Line. Currently, six rail halts are located on the main line at Musselburgh, Wallyford, Prestonpans, Longniddry, Drem and Dunbar, with North Berwick Station on the branch. There are also new station safeguards in the current local plan at Musselburgh (for a 'Parkway' station concept), East Linton and Blindwells. A bid is currently being progressed by the Council to seek part funding from the Scottish Government to deliver a new rail halt at East Linton, but at the time of writing there is no commitment to Government funding.
- 2.24 Notwithstanding this, local trains are often full at peak times: while additional carriages would help the situation this may require the lengthening of existing station platforms to accommodate longer trains as well as a need to expand station car parks. A route for Tram Line Three adjacent to the proposed Craighall Business Park west of Musselburgh is also safeguarded in the City of Edinburgh Council's Second Proposed Local Development Plan (with the potential to be extended further), although little progress has been made on that project. Commuting bus services are busy at peak times and those to the city are more numerous and frequent in settlements in the west of East Lothian than those in the east, as Lothian Buses only operate in the west of the area. While local bus services serve the main settlements as well as those in the countryside, their number, frequency and integration with other public transport modes could be improved. In a deregulated transport system the Council is limited in what it can do to assist service provision. First Buses decision in 2012 to withdraw/amend a number of local services highlights this situation.

2.25 East Lothian's transport network and services are experiencing capacity constraints which are compounded in the west by commuting travel patterns from the east causing issues 'down line' in the morning and afternoon peak times. These existing capacity constraints have been caused by the cumulative impact of population growth in, and commuting through and from, the area. Impacts are anticipated from further developments planned in East Lothian and also the areas around it, requiring suitable interventions to be delivered to minimise capacity constraints.

Air Quality

2.26 In Musselburgh deteriorating air quality in the town centre has resulted in the designation of an Air Quality Management Area in the High Street. An Air Quality Action Plan is being prepared to improve air quality. In the short term measures such as altering the spacing and usage of bus stops is being considered. However, improvements to the bus fleet may also bring about a significant improvement in air quality. In the medium and longer term, further intervention may be required, potentially including a rebalancing of vehicle flows through the town. Tranent High Street is also an area where air quality is regularly monitored. A longer term option for Tranent may also be to consider the redistribution of vehicle flows in the town centre.

Infrastructure

Water & Drainage Capacity

2.27 To support development Scottish Water (SW) is funded to provide strategic capacity that may be required to increase the capacity for water supply / waste water treatment ('Part 4' assets) in association with development: where additional capacity is needed to being forward development, developer contributions are not required.

2.28 However, where capacity is available in SW strategic assets there should be a preference to utilise it where appropriate as part of the planning strategy before distributing development to locations where new capacity need be provided to accommodate it. If new strategic capacity is required to facilitate development in the right place, it is necessary to consider how long it will take to deliver it and enable development. The implications of this on any programme of development must be considered. Normally the preference is to secure connections to SW networks. The consultation zones for SW strategic assets and their capacity status is provided below:

Table 3: Scottish Water Consultation Zones / Strategic Asset Catchments And Capacity Status

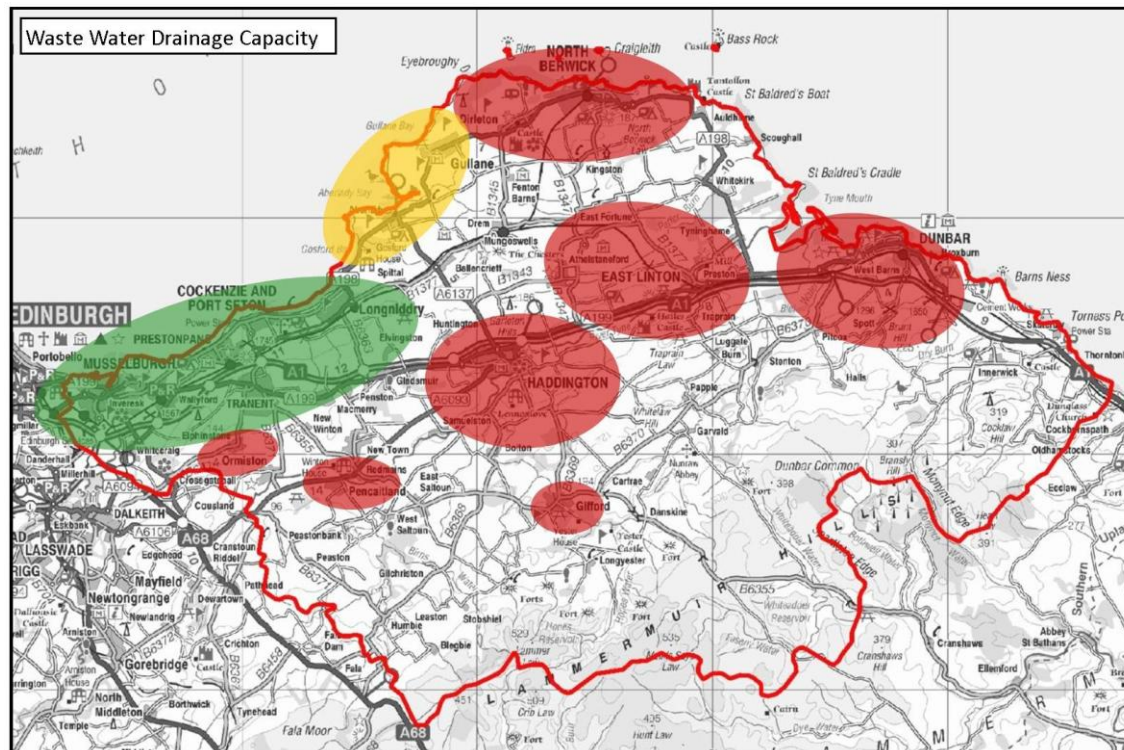
	Water Supply	Status	Waste Water	Status
Musselburgh / Wallyford / Whitecraig / Tranent	Rosebery / Glencorse / Castle Moffat	Capacity	Seafield WWTW	Available Capacity
Prestonpans / Cockenzie / Port Seton / Blindwells	Rosebery / Castle Moffat	Capacity	Seafield WWTW	Available Capacity
Ormiston	Rosebery	Capacity	Ormiston WWTW	Very Limited Capacity
Pencaitland	Rosebery	Capacity	Pencaitland WWTW	Very Limited Capacity
Elphinstone	Castle Moffat	Capacity	Ormiston WWTW	Very Limited Capacity
Haddington	Castle Moffat	Capacity	Haddington WWTW	Very Limited Capacity
Gifford / Bolton	Hopes	Capacity	Gifford WWTW	Very Limited Capacity
East Linton	Castle Moffat	Capacity	East Linton WWTW	Very Limited Capacity
Stenton	Castle Moffat	Capacity	Stenton WWTW	Limited Capacity
Dunbar	Castle Moffat	Capacity	Dunbar WWTW	Very Limited Capacity
West Barns / Dunbar	Castle Moffat	Capacity	West Barns Sep	Very Limited Capacity
Innerwick	Castle Moffat	Capacity	Innerwick WWTW	Limited Capacity
North Berwick / Dirleton	Castle Moffat	Capacity	North Berwick WWTW	Very Limited Capacity
Gullane / Aberlady	Castle Moffat	Capacity	Gullane WWTW	Limited Capacity
Athelstaneford	Castle Moffat	Capacity	Athelstaneford	Very Limited Capacity

2.29 Including all planned and committed development proposals, capacity exists at SW strategic assets serving settlements in the west of East Lothian. There are currently foul drainage constraints to further significant growth at Haddington, East Linton, Dunbar and North Berwick. While these constraints could be overcome with investment, this is not identified as a funding priority by SW at this time. SW would require its 5 growth criteria⁶ to be met before it could initiate any growth project.

2.30 At North Berwick, as a consequence of the foul drainage needs of strategic housing allocations at Mains Farm and Gilsland, the town's Waste Water Treatment Works (WWTW) is very near capacity. A 10,000 population limit is set on the current WWTW which has a catchment that includes Dirleton. To further significantly increase population here SEPA would require a step change in the type of treatment infrastructure. Scottish Water suggests that a £15m – £20m investment may be required. An increase in capacity at East Linton WWTW to accommodate an existing allocation at Orchardfield is subject to an Environmental Impact Assessment due to the existence of protected species in the area.

⁶ The Scottish Water (Objectives for 1st April 2010 to 31st March 2015) Directions 2009, Paragraphs 3(b) and 4 - <http://www.scotland.gov.uk/Resource/Doc/917/0088613.pdf>

2.31 The other items of water/waste water infrastructure required to enable development include new water mains or treated water storage tanks (Part 1, 2 and 3 assets or the 'local network') and on site pipe work. These remain the responsibility of developers to provide, although SW may make a contribution under the Reasonable Cost Contribution (RCC) provisions which in part act to mitigate such expense. Therefore, with the exception of Haddington, East Linton, Dunbar and North Berwick the water / waste water infrastructure issues in the area will likely be in relation to the Part 1 to 3 costs involved in mitigating any impact of the development on the local network. In some cases further investigation may be required in respect of water supply and / or a drainage impact assessment may be needed to ascertain impact of development on the local network.



2.32 Where there is no public water supply network within the vicinity, there would be a need either for a private water treatment system or to lay new water infrastructure to the existing public network, and early discussion with Scottish Water would be required. Where there is no public sewer network a private wastewater treatment system may be required and discussion with SEPA to discuss specific requirements would be essential.

Education Capacity

2.33 Ensuring the availability of sufficient education capacity is an essential part of the proper planning for new housing development. New housing places a demand for additional education capacity which can either be met by using available capacity at existing schools or, where none exists, by providing additional capacity either within an existing school or by providing a new school. Where no existing capacity is available, the Council expects developers to fund that amount of additional capacity that arises as a direct result of their proposed development, where appropriate on a cumulative basis with other proposals.

2.34 The costs of additional education capacity can place significant up-front costs on a new housing proposal. Schools can also only be expanded to a certain point – e.g. where either the accommodation or campus can be expanded no further, or the school would become of such a size that this could affect educational outcomes. Catchment reviews may help by redistributing demand but these bring their own challenges. Making use of existing capacity / the ability to make additional capacity available by expanding existing schools in an appropriate way will be a key driver of any planning strategy for new housing in the area.

2.35 The following is a summary of the current position with regard to education capacity in East Lothian. It is based on the catchments of the six existing secondary school clusters. The summary reflects the consideration that has been given at this stage to how facilities might be able to accommodate projected pupil rolls from existing housing sites and also how facilities may be able to expand further beyond their current capacities / committed expansions in order to maximise the education capacity that may be made available within the area.

Musselburgh Cluster

2.36 The extent and appropriateness of any significant expansion to Musselburgh Grammar will have a major influence on the amount of new housing that may be accommodated within its catchment area. The school currently has a capacity of 1,350 pupils and a restricted campus, with space for P.E. in the curriculum currently provided off site at Pinkie Playing Fields. To accommodate existing housing commitments in the schools' catchment area the expansion of Musselburgh Grammar beyond its existing capacity would be required. While there is physical potential for an increase in capacity at

Musselburgh Grammar on its existing site, this is subject to an assessment of the impact any such expansion of this already large school might have on delivering educational outcomes. If the Grammar were not to be expanded beyond the capacity needed to accommodate existing housing commitments then, in the absence of any alternative means of further increasing secondary education capacity, this would be a significant constraint on any further new housing allocations in this cluster.

2.37 The ability to provide additional primary school capacity in Musselburgh is also very restricted. Some very limited capacity is available in existing primary schools to the west of the town, but elsewhere in the settlement the capacity of existing facilities is projected to be reached as a result of natural change in the baseline pupil roll projections and / or existing housing commitments. Additionally, the existing primary schools are landlocked and their sites are unable to expand further. An expansion of the committed new Wallyford Primary School once it is in place would be possible. There would also be scope for a potential capacity increase at Whitecraig Primary School. If any significant amount of new housing were to be supported elsewhere in the cluster then this would likely require more new primary school(s) to be provided as part of those proposals.

Preston Lodge Cluster

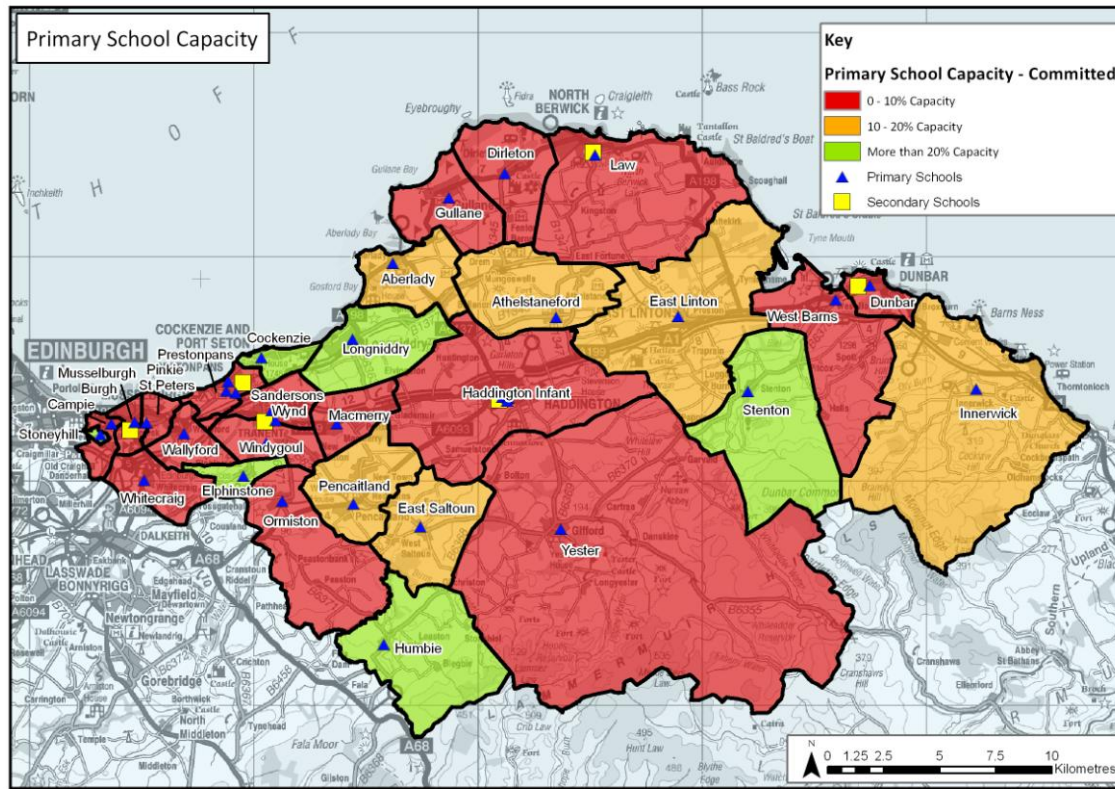
2.38 Prestonpans' Preston Lodge High School has committed capacity which is sufficient to accommodate existing housing commitments in its catchment area. There may be potential for a further increase in capacity at Preston Lodge High School. Should any such additional capacity be provided, its provision and use would be dependent on a number of considerations: the education solution for the current allocation for Blindwells new settlement and any expansion of it, or if Preston Lodge were to be used to accommodate pupils from new development in Musselburgh, or if an expansion of an existing settlement in the Preston Lodge cluster were to be supported.

2.39 Prestonpans Infant and Primary Schools are projected to reach capacity with current housing commitments and there is no scope for the further expansion of these facilities. Cockenzie Primary School has some available capacity as well as the potential for further modest expansion, and this school may also be seen as part of a short term education solution for Blindwells. Longniddry and St Gabriel's Primary Schools have a limited amount of available capacity and no potential for further expansion beyond their current size on their current sites.

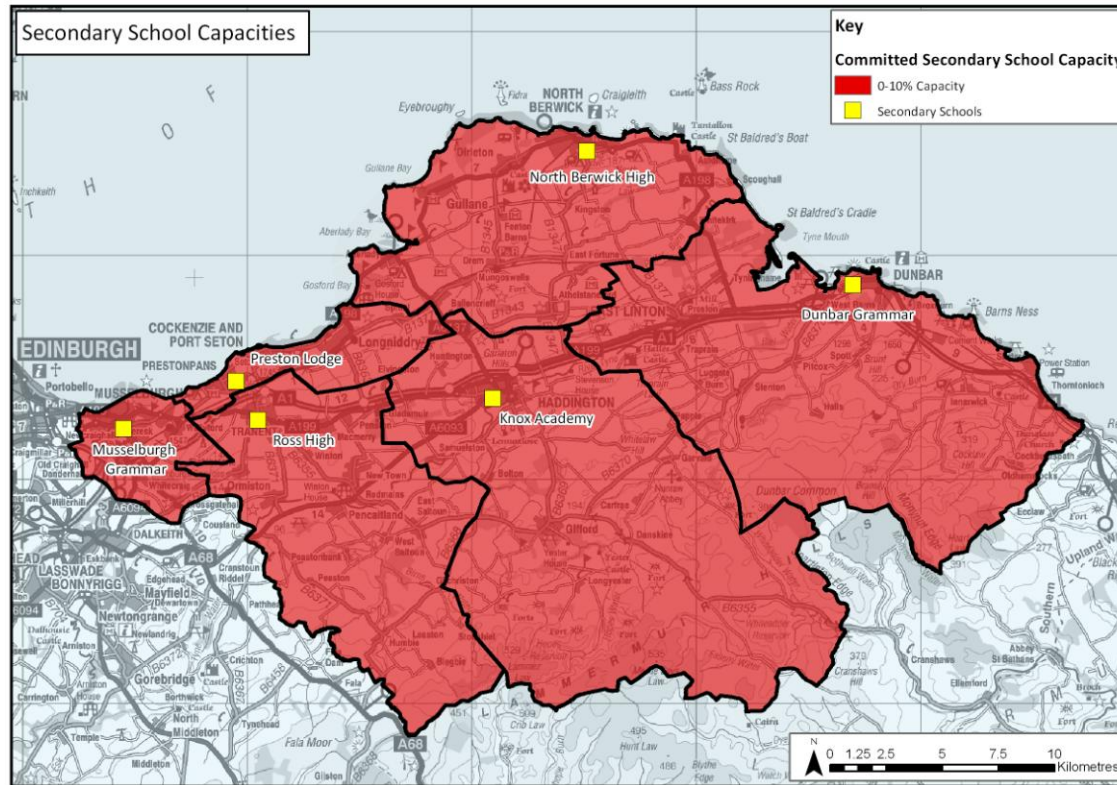
Ross High Cluster

2.40 Tranent's Ross High has additional accommodation committed to provide further capacity to accommodate current housing commitments. There may be potential for a further expansion of this school's capacity, but the scope for this is constrained. This is principally due to the size of the existing campus and in part prevailing ground conditions. Windygoul Primary in Tranent has significant capacity issues that may require additional

adjacent land to resolve. Sanderson's Wynd, Tranent, and Macmerry primary schools have the most potential for provision of additional capacity. Elsewhere, available primary school capacity and expansion potential is limited.



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Haddington Cluster

2.41 Knox Academy has additional capacity programmed to expand to accommodate existing housing commitments and there may be some potential for further expansion beyond this. However, the situation at primary school level is very pressured. Haddington Infant and Kings Meadow primary schools have very limited capacity beyond current commitments and no scope for further expansion. St Mary's RC has no spare capacity and no

potential for expansion. The catchment of the proposed Letham Mains Primary School relates only to the site of that development, but does have some expansion potential. Yester Primary also has some potential to be expanded.

Dunbar Cluster

2.42 Dunbar Grammar has a capacity increase programmed to provide pupil places to meet existing housing commitments. Beyond this, further capacity increase may be possible. Additional accommodation is also programmed for Dunbar Primary School to accommodate additional pupils. While a further capacity increase beyond this may be possible at the facility, the pupil roll is already very large. Elsewhere, limited capacity is available at East Linton, Innerwick and Stenton. Some additional capacity provision may be possible at East Linton and Innerwick while West Barns primary school may be modestly expanded beyond that needed to accommodate current commitments.

North Berwick Cluster

2.43 North Berwick High School is to be expanded to accommodate existing commitments. Land on its western side is safeguarded for education purposes in the current local plan: it would provide scope to provide additional capacity. Law Primary School is also to be expanded for existing commitments following realignment of Haddington Road, but may not be able to expand further. Other than Dirleton and Athelstaneford primaries, which have very limited capacity available and can't be expanded, Gullane and Aberlady primary schools have very limited capacity and may have potential for further modest expansion on site.

Emerging Issues

2.44 East Lothian has a relationship with the city and other parts of the city region and its settlements and centres, but it also offers something different. It has wide variety of high quality built and natural environmental capital and, with countryside and coast in the area, an abundance of leisure tourism opportunities. All this is within easy access of the city and places the area in high demand as a place to live, work, recreate and visit. However, the very characteristics that attract people to East Lothian are also those that are at risk of being lost if new development is not introduced sensitively.

2.45 Agricultural activity continues throughout East Lothian, reflecting the quality of agricultural land available. However, the area's economic base is also changing. Mining, fishing and manufacturing are diminishing sectors while the service sector and tourism activity are growing. Small to medium size enterprise is a strength in the area, but when compared to other parts of the city region in terms of connections and relative accessibility via national

and international modes of transport, East Lothian is currently a less preferential location for attracting large scale economic development and employment opportunities. Employment land delivery, and thus the provision of new jobs, is a significant issue. This is particularly so given the projections for increased population / need for housing and because the area is an attractive place to live. This influences the availability of land, including allocated land, for economic development because much of it is owned or controlled by those wishing to build homes rather than provide employment opportunities. This is a significant challenge to bringing about an increase in the job density in the area and realising associated benefits, including helping to address the commuting travel pattern and associated CO₂ emissions and to help reduce inequalities.

- 2.46** East Lothian has been the subject of strategic development pressure for many years, mainly because it is part of the Edinburgh Housing Market Area. This has resulted in the expansion of settlements, with those neighbouring ones in the west drawing closer together and those in the east near the limit of what can be achieved in the way of expansion without significantly changing their character and setting. Accommodating the SDPs additional development requirements, particularly its housing requirements, in East Lothian will require very careful consideration of the area's environmental and infrastructure opportunities and constraints and how infrastructure constraints may be overcome; as such a key related consideration will be the resources available to implement any development strategy.
- 2.47** Consideration should be given to the way the housing market operates across and within East Lothian (it likely has greater capacity in the west of the area than the east) and also to the delivery of new homes, including affordable homes, where there is likely greatest need and demand for them. Regeneration should be promoted and new development should be integrated with sustainable transport options. The need to travel as well as travel distances should be minimised together with associated CO₂ emissions. Opportunities to use public transport and improve active travel options should be maximised. Providing homes nearby employment opportunities is a related consideration. Other important factors will be consideration of the existing settlement pattern in the area, the form and structure of towns as well as the future extent of the green belt. The introduction of a green network to the area, which safeguards and links important areas of open space and natural habitats, and includes improved opportunities for active travel, will also be an important mitigating factor which could also help improve community health and well-being.
- 2.48** In East Lothian the availability of jobs relative to the population (job density) is lower than in other local authority areas as well as the rest of Scotland. While many people are attracted to live in East Lothian, around half of its working residents elect to travel out of the area to access the wider range of jobs (often higher value), goods and services on offer elsewhere in the city region. Whilst many of the area's residents are highly qualified, there are also areas of deprivation, and regeneration opportunities continue to exist particularly in the west of East Lothian. The west of East Lothian is currently its most accessible part in terms of connections to the wider city region, including in terms of digital connectivity. Yet there may be scope for improved local rail services including potential for a new rail halt at East Linton. High speed digital networks (240mb and above) are

also programmed for expansion across almost all of East Lothian by 2018. This means that 90% of properties will be served by this broadband speed and all remaining properties (likely to be in the countryside) are programmed to have at least 2mb provision in the same period.

- 2.49** East Lothian has six main towns and many smaller settlements with their own individual and different character and few remaining meaningful urban brownfield re-development opportunities. This means there will be pressure for the release of further greenfield land to accommodate the development requirements of the SDP. The main towns act as service hubs for the smaller satellite settlements around them and each has its own role in the hierarchy of settlements / centres. The historic nature of the settlements means they are well consolidated. This influences the type and scale of new development, including commercial and retail development, that can be accommodated within them and their town centres. Overall, people from East Lothian settlements travel to shop elsewhere to other settlements and centres in the city region. An emerging issue is how any additional retail provision might be accommodated in the area in view of its growing population.
- 2.50** These factors combine to restrict access to housing, jobs and other opportunities for some residents (placing them at a disadvantage) as well as generate commuting travel patterns and associated CO₂ emissions. They are also manifested in the need for affordable housing, in the transport network capacity issues, in the demand for and limited capacity in public transport and other services as well as in car based commuting. The trend towards travelling longer distances (and possibly online retailing) has also influenced shopping habits, impacting on the role, vitality and viability of East Lothian's town centres and the range of amenities available locally.
- 2.51** Demands are also being placed on the areas facilities and infrastructure to ensure adequate local service provision and infrastructure capacity. While some available water and drainage capacity exists in the west of the area, additional infrastructure capacity in general in many areas will need to be provided to accommodate new development. In view of the scale of growth the area has accommodated, the lack of available education capacity is now a very significant issue to be resolved in order to accommodate further new development. New education capacity / facilities at primary and secondary level will be required to accommodate the SDP's housing requirements.
- 2.52** Overall, significant investment will be required to overcome the infrastructure constraints in the area, at a time when the availability of funds restricts the delivery of the increased infrastructure capacity that is necessary to deliver growth. Yet there is continuing need to make appropriate development land available in East Lothian and finding this will present challenges, but it will also offer opportunities.

3 The National, Regional & Local Policy Context

- 3.1 The strategy and policies of the LDP must reflect the National Planning Framework (NPF), Scottish Planning Policy (SPP) and Advice (PAN's) as well as conform to the SDP. The LDP will also have a role to play in supporting a number of other national, regional and local plans and strategies. At the same time, it should reflect the views and aspirations of the Council and those who live, recreate and do business in East Lothian. A series of early community engagement workshops were held to inform the preparation of this MIR and written comments were also invited. This MIR has an important role in communicating and seeking views on ideas for the future development of East Lothian and explaining the wider policy context.

National Planning Framework & Scottish Planning Policy

- 3.2 The LDP must take into account the Scottish Government's third National Planning Framework (NPF3) as well as Scottish Planning Policy (June 2014). NPF3 sets out the long term development strategy for Scotland and identifies national developments that should be accommodated by development plans. NPF3 is the Scottish Government's spatial plan for how to make a more successful country with opportunities for all to flourish by increasing sustainable economic growth. SPP sets out national planning policies for how the planning process can contribute to realising this.
- 3.3 NPF3 expects south east Scotland, which includes East Lothian, to continue as the driver of the Scottish economy. It notes that there is a need to deliver land for new homes and to invest in infrastructure, including where cross local authority boundary impacts are expected such as trunk road capacity, including the A720 city by-pass. Opportunities for regeneration are to be maximised. The importance of towns in the city region is also recognised. NPF3 acknowledges that infrastructure capacity in general is a significant issue: in some cases new facilities will be needed, but best use should first be made of existing capacity and facilities where appropriate; innovation and joint working will be needed to secure funding mechanisms for more capacity. In the longer term the spatial strategy for the Edinburgh city region will need to acknowledge regional infrastructure constraints.
- 3.4 Key economic sectors to be supported in the city region include financial services, life sciences and universities, food and drink, tourism and energy related development. Cockenzie Power Station and the Forth coast to Torness is potentially an important energy hub and NPF3 recognises the need for infrastructure that allows electricity from off shore wind projects to be connected to the grid. In relation to Cockenzie, the LDP is to (i) continue to support its status as a location for non-nuclear baseload electricity generating capacity and associated infrastructure, potentially including facilities for Carbon Capture and Storage (ii) recognise its potential for renewable energy related development as well as (iii) its potential for port-related

development. If competing proposals emerge, those with greatest economic benefits and which make best use of the location's assets are to be prioritised. NPF3 does not support development of new nuclear power stations, but an extension to the operational life of Torness is not ruled out.

- 3.5 The Central Scotland Green Network is a national development which also extends into East Lothian that is to help maintain the environmental quality of the area and to promote active travel opportunities and healthier lifestyles.

The Strategic Development Plan (SESplan)

- 3.6 SESplan's SDP was approved by Scottish Ministers in June 2013. By law, the LDP must conform to the Strategic Development Plan (SDP). The SDP covers the planning period up to 2024, and also signposts potential future housing requirements and a spatial strategy for the city region up to 2032. In summary, the SDP sets out a spatial strategy which broadly continues that of the former Edinburgh and Lothians, Fife and Scottish Borders structure plans. It identifies a number of Strategic Development Areas (SDAs) which local development plans must prioritise as locations to accommodate the SDPs strategic housing and employment growth. East Lothian has one SDA and it runs along the key transport corridor of the A1 and East Coast railway line from Musselburgh to Dunbar.
- 3.7 The SDP sets an overall housing land requirement for the SESplan area of 107,545 homes up to 2024. To meet this total, land capable of delivering 74,835 homes is to be available in the short term up to 2019, with land for a further 32,710 homes to be available in the medium term up to 2024. The distribution of this housing land across the city region has been confirmed by Ministerial approval of SESplan's Supplementary Guidance on Housing Land (see para 5.35 below). Of this regional total, SESplan's Supplementary Guidance on Housing Land identifies that, for East Lothian, land capable of delivering 10,050 homes will be needed up to 2024, with an interim requirement of land capable of delivering 6,250 homes up to 2019. A five year effective housing land supply is also to be maintained at all times.
- 3.8 A further requirement of the SDP is to maintain 76 hectares of employment land in East Lothian. It also identifies four key employment locations within the area where employment land is to be provided. These locations are at Craighall, Macmerry, Blindwells and at Spott Road Dunbar. The SDP also establishes a policy framework on matters such as employment, housing, town centres and retailing, minerals, energy and waste, transportation and infrastructure, water and flooding, and on green belts and green networks.

3.9 LDPs must conform to the SDP development strategy, development requirements and policy framework. Importantly, the SDP is clear that in the selection of new development sites to meet its requirements, existing allocated sites must be carried forward and these existing allocations must be complemented by and must not be undermined by new land allocations.

The Council Plan, Single Outcome Agreement and other relevant Plans Policies and Strategies

3.10 The Council’s overall aim, expanded upon in the Council Plan 2012 - 2017, is to create a prosperous, safe and sustainable East Lothian that will allow its people and communities to flourish⁷. The Council Plan also has four objectives, namely to 1) grow our economy; 2) grow our communities; 3) grow our people; and 4) grow the capacity of our Council. The outcomes that the Council would wish to achieve stem from the Council Plan aims and objectives and are reflected in the Single Outcome Agreement⁸ 2013 – 2023, prepared by the East Lothian Partnership.

3.11 The partnerships statement of intent is that “We will work in partnership to build an East Lothian where everyone has the opportunity to lead a fulfilling life and which contributes to a fair and sustainable future”. The partnerships overarching priority is to reduce inequalities both within and between East Lothian’s communities. To work towards this strategic objective the partnership has set 10 outcomes which it would wish to achieve. The ability of the LDP to contribute to the outcomes is highlighted in the following section on the proposed Vision, Aims, and Objectives for the LDP.

3.12 The Council’s Economic Development Strategy⁹ 2012 – 2022 identifies the strengths which East Lothian has and can exploit to maximise its sustainable economic competitiveness. It recognises many of the opportunities and challenges facing the area as highlighted in the previous section. The Council’s Local Housing Strategy 2012 - 2017 is approved, but it will need to be refreshed in light of SESplan’s Supplementary Guidance on Housing Land. This will be progressed in parallel with the LDP. The regional transport strategy (currently under review) has been reflected in the SDP. East Lothian’s Local Transport Strategy 2000 is under review and this will be progressed in parallel with the LDP. In addition to the SDP, there are also a range of other plans, policies and strategies to which the LDP must have due regard. These include the Council’s Draft Open Space and Sports Pitch Strategy, its Biodiversity Action Plan and its Core Path Plan.

3.13 In the preparation of the MIR adjoining planning authorities have been consulted and account has been taken of their emerging LDPs. Cross boundary matters have also been explored as part of this and related opportunities and constraints are discussed more fully in the following sections.

⁷ Council Plan 2012-2017, East Lothian Council

⁸ Single Outcome Agreement 2013 - 2023, East Lothian Council

⁹ Economic Strategy 2012 – 2022, East Lothian Council

Additionally, a consultation draft of the national marine plan was published in July 2013, with the final plan expected at the end 2014. Regional Marine Plans will follow the national one. The finalisation of these plans will determine if there is a need to consider the relationship between marine and terrestrial plans in the LDP.

- 3.14 For planning purposes the Zero Waste Plan constitutes the National Waste Management Plan along with NPF3, SPP, PANs and SEPA waste data sources, including Waste Data Digests and Waste Infrastructure Maps and Thermal Treatment of Waste Guidelines 2009. River Basin Management Plans for Scotland are in place and associated flood risk management plans are due to be published by 2016. Related considerations of these other plans, policies and strategies will be reflected in the LDP as relevant.
- 3.15 Any issues arising out of the European Directive on the control of major accident hazards involving dangerous substances are also to be taken in to account by the LDP, including through controls on the siting of new establishments, modifications to existing establishments and new developments (transport links, residential areas, etc.) in the vicinity of existing establishments. There is a need to ensure that appropriate distances are maintained or created between establishments and residential areas. There are a number of gas pipelines throughout East Lothian as well as Torness Nuclear Power Station and existing policies address related issues.
- 3.16 There will be a need to reflect these other plans, policies and strategies in the LDP as relevant and required. The range of plans, policies and strategies that have been taken in to account as relevant to the Strategic Environmental Assessment (SEA) process are highlighted in the Interim Environmental Report which has been published alongside this MIR.

The Role of the Main Issues Report

- 3.17 The main purpose of the MIR is to describe the implications of the SDP for East Lothian, and to discuss how its development requirements could be accommodated in the area taking in to account other plans and strategies as relevant. The MIR highlights the preferred approach at this stage for delivering the development requirements of the SDP for East Lothian and, where relevant, any reasonable alternatives to the preferred approach, if they exist. The detailed requirements of the SDP for East Lothian are discussed under each of the main issues, which are set out below the following section. The main issues are separated out into discussion on spatial strategy issues, including provision of housing and employment land, and for protecting and enhancing the environment. This is carried forward into a discussion on how the preferred strategy approach might be implemented in each cluster area in East Lothian. This is followed by a review of main policy issues. As a precursor to this, the following section discusses the proposed Vision, Aims & Objectives for the LDP.

4 Vision, Aims, Objectives & Outcomes

Vision

4.1 Being a part of the Edinburgh City Region the planning vision for East Lothian has already been set by SESplan's SDP, namely that:

“By 2032, the Edinburgh City Region is a healthier, more prosperous and sustainable place which continues to be internationally recognised as an outstanding area in which to live, work and do business.”

4.2 This vision statement is broadly relevant to the LDP and the intention is to carry it through to the LDP.

Aims, Objectives and Outcomes

4.3 The following are proposed to be the main aims of the LDP, taking into account those Council Plan objectives that are directly relevant to land use planning. In addition, the references in brackets indicate which of the ELCPP Single Outcome Agreement the aim or objective supports:

Aims and Strategy Drivers [SOA: 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10]

1. To recognise that East Lothian is part of the wider city region and has a significant role to play in accommodating and providing for the city region's as well as its own economic, population and household growth in a sustainable way
2. To identify locations where development of different types associated with these aims should take place, where relevant within the appropriate timescales, as well as where development should not occur
3. To provide an appropriate framework of policies and proposals that can promote and manage development in the area towards these aims

Objectives and Outcomes

Promote sustainable development [SOA: 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10]

- To ensure that new development, and the locations where and way in which it is delivered, contributes to climate change and regeneration objectives, including the need to reduce travel, green house gas emissions as well as energy consumption and waste, and to provide for appropriate renewable energy generation opportunities
- To make efficient use of land, buildings and infrastructure, prioritising the development of previously developed land over greenfield land where possible, while recognising that the nature of East Lothian and scale of strategic development requirements will likely require significant amounts of greenfield land to be used
- To integrate land use and transport by finding locations for new development that reduce the need to travel and that are well-served by a range of transport modes, particularly public transport and active travel opportunities, and to help reduce CO₂ emissions

Help grow the economy, increase housing supply and reduce inequalities [SOA: 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10]

- To provide opportunities for economic growth and job creation and to meet housing requirements in appropriate marketable locations
- In so doing, to promote regeneration and the creation of mixed communities which provide opportunities for employment and housing, including affordable homes, and areas for leisure and recreation and other services and amenities locally, focusing on town centres first
- To recognise the important role that town centres and other mixed use areas have in providing services locally and to protect them from inappropriate development while identifying where and how appropriate new beneficial development opportunities may be realised
- To encourage the diversification of the rural economy by supporting appropriate economic development and tourism, while recognising the pressures the area is under for housing development, and to maximise the use of appropriate traditional buildings

Protect and enhance the area's high quality environment and its special identity [SOA: 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10]

- To ensure that new development is located in such a way that it respects the character, appearance and amenity of the area, including its settlements and their settings
- To ensure that the area's significant international, national and local cultural and natural heritage assets are protected and conserved, and where appropriate enhanced, including biodiversity, flora and fauna as well as soil, water and air quality
- To direct development to locations and to design new development so it will be resilient to the effects of climate change and helps manage flood risk
- To ensure that the design of new development reflects the sense of place and identity of the local area, and is properly integrated with its surroundings in terms of movement as well as form and appearance, while contributing to wider sustainability and place making objectives

Ensure adequate infrastructure capacity and an appropriate use of resources [SOA: 1, 2, 3, 4, 5, 6, 7, 8, 9 and 10]

- To ensure that all new development is capable of being served by available infrastructure capacity, or that this will be provided to allow the development to take place, while maintaining appropriate levels of service
- To make use of existing and promote the expansion of digital networks throughout the area
- To minimise energy consumption, safeguard mineral deposits where appropriate and reduce waste arisings

4.4 The SDP's specific implications for the LDP are discussed in detail under each of the main issues set out in the following section.

Question 1: Aims, Objectives and Outcomes

Do you have any comments on the aims and objectives for the LDP?

5 Spatial Strategy Issues & Options

Main Strategy Issues & Options for the LDP

Sustainability & Climate Change

- 5.1 The Town and Country Planning (Scotland) Act 1997 (as amended), Section 3E, requires planning authorities to carry out their development planning functions with the objective of contributing to sustainable development, having regard to Scottish Planning Policy (SPP). SPP sets out how planning decisions can contribute to sustainable development, including by the integration of land use and transport. This includes helping to reduce greenhouse gas emissions in line with the commitment to reduce these by 42% by 2020 and 80% by 2050¹⁰ - i.e. against the 1990 baseline.
- 5.2 A presumption in favour of development that contributes to sustainable development has also been introduced to SPP¹¹. Development Plans are to take this in to account alongside the environmental and infrastructure opportunities and constraints in their area. They are to direct development to appropriate locations, integrate land use and transport and help bring about regeneration. The development strategy should also be deliverable in view of the resources available to implement the plan¹².
- 5.3 Sustainability is a theme that is already embedded in the SDP's spatial strategy and policy approach and is not a separate policy area. It is a specific aim of the SDP to ensure that new development is directed to sustainable locations. The SDP also requires LDP policies and proposals to respond to climate change by promoting mitigation, adaptation, appropriate design, regeneration and by encouraging the use of sustainable building materials¹³.
- 5.4 The LDP should promote appropriate development in less environmentally sensitive areas; prioritise the use of brownfield land over greenfield land; promote the efficient use of land, buildings and infrastructure; help secure regeneration and the creation of mixed communities; protect and conserve, and where appropriate enhance, the cultural and natural heritage, including the landscape and open space; improve habitat connectivity and access to services and facilities locally; reduce the need to travel and promote more sustainable and active modes of transport (thereby helping

¹⁰ Climate Change (Scotland) Act 2009 and SPP paragraph 18

¹¹ Scottish Planning Policy paragraph 27

¹² Scottish Government Circular 6/2013 Development Planning paragraph 57

¹³ SESplan SDP Policy 1B

reduce transport based CO₂ emissions); help manage the use of resources including air, water, soil and in waste management; consider the lifecycle of development and encourage the use of sustainable and recycled materials in construction; and contribute to climate change adaptation. The LDP should also promote flood risk schemes, avoid development in areas of flood risk as well as those susceptible to coastal erosion, and contain policies and proposals that conform to the SDP, including with respect to design and development density. These issues should underpin The LDPs spatial strategy, site selection and policy approach.

Table 4: Sustainability & Climate Change	
Preferred Approach	Promote sustainability and climate change mitigation and adaptation: embed the principles of sustainable development in the LDPs spatial strategy, policies and proposals to ensure it promotes and manages development in the interests of sustainable development, including reducing greenhouse gas emissions.
Reasonable Alternative	None

Question 2: Sustainability & Climate Change

In terms of the approach to sustainability and climate change mitigation and adaptation, section 3E of The Town and Country Planning (Scotland) Act 1997 (as amended) as well as SPP and the SDP require the LDP to follow the preferred approach.

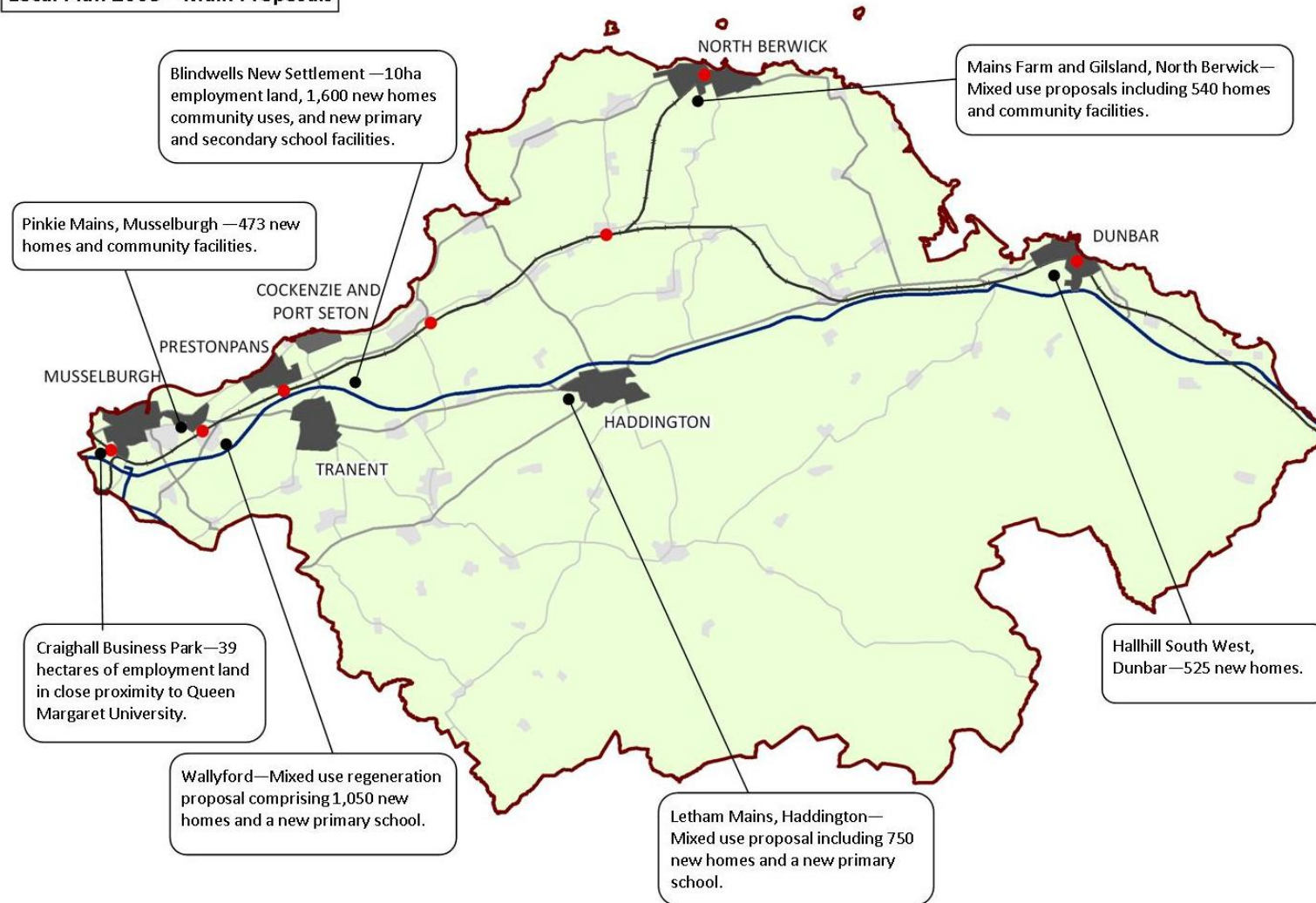
Are there any other matters related to sustainability and climate change mitigation and adaptation that you think the LDP should seek to address?

Development Locations

- 5.5 The SDP requires existing land allocations set out in the current local plan to be retained: new development brought forward by the LDP must complement and not undermine these. SPP is also clear that where a plan is under review this should not be undermined by premature proposals¹⁴. The existing local plan strategy was guided by the previous structure plan which acknowledged that East Lothian is part of the wider Edinburgh housing market area. It required land to be allocated for new housing to provide for the population and household growth anticipated in the area at that time. This was also to accommodate a proportion of such growth anticipated to be generated by and migrate from Edinburgh to East Lothian.
- 5.6 This housing land was accompanied by land allocations for economic development. The co-location of housing and employment land in East Lothian was to help promote and grow the area's economy and to help reduce the need to travel. Yet job density is still lower in East Lothian than the surrounding local authorities. There is a trend of significant car based out commuting from East Lothian because of this, as residents travel out of the area to access the jobs available more widely elsewhere in the city region. In view of these factors, and to help manage the introduction of new development appropriately, the locations selected for development under the current strategy are accessible, including by public transport.
- 5.7 The current local plan strategy identifies 6 main growth locations where new housing and employment land has been provided close to one another, including at a new settlement at Blindwells. The main proposals are illustrated on the plan on the following page. Sites for housing and economic development are spread among East Lothian settlements, and nearby transport corridors and public transport services. The expansion of existing settlements is promoted where infrastructure solutions have been found and where landscape capacity allows. In the west of the area sites are allocated to help promote regeneration. The new settlement at Blindwells former open cast mine is promoted by the current local plan. It is a medium to long term development opportunity with significant growth potential. There is a potential opportunity to increase the scale of the current allocation of 1,600 homes and 10ha of employment land at Blindwells by expanding into land further east. It is the current local plan strategy intention that this should be realised in preference to the further significant expansion of existing settlements, some of which are nearing the limit of expansion beyond which significant changes to their landscape setting, character and infrastructure would be required.
- 5.8 The current strategy is in place so the benefits of a successful and growing city region can be spread and shared among East Lothian's communities, to make good use of previously developed land with degraded landscape character, and to encourage regeneration where appropriate. The intention is to promote growth where environmental capacity exists, while creating accessible mixed communities that provide opportunities for economic development and to reduce out-commuting.

¹⁴ Scottish Planning Policy paragraph 34

Local Plan 2008—Main Proposals



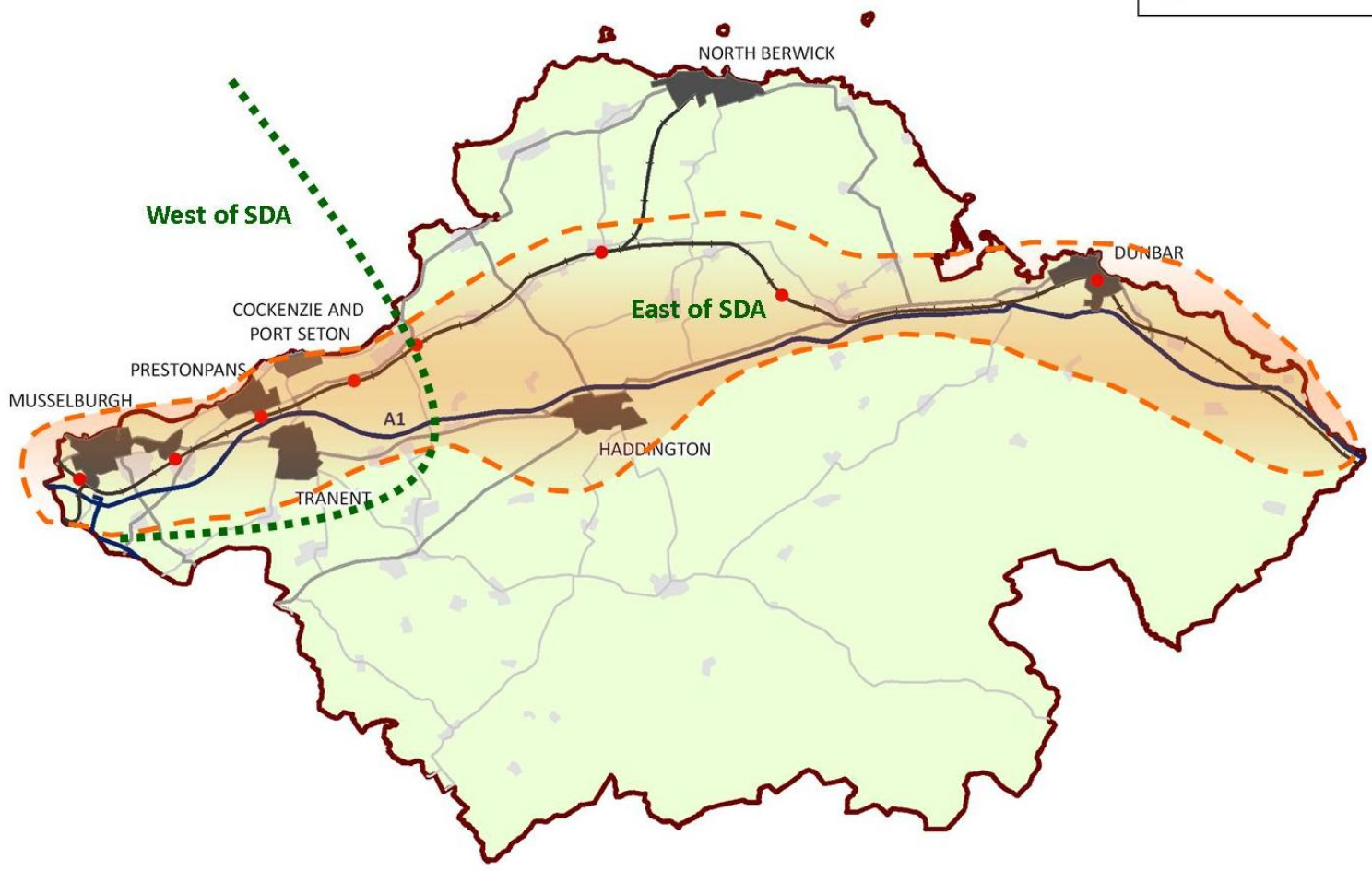
- 5.9 This sharing of growth throughout East Lothian has led to a strategy of ‘dispersed’ strategic and smaller scale sites allocated for housing and economic development. The focus of growth on the existing main settlements promotes them as service centres for the growing population in and around them. Under the current strategy Blindwells is to remain subservient to the existing main settlements, but this may change in future. **However, this ‘dispersed’ strategy has resulted in some existing land allocations being more distant than others from where significant mobile demand for housing originates, and from the existing main centres of employment and other identified locations with greatest potential for significant job creation and economic development in the wider city region.** The economic climate in general may continue to make some sites in East Lothian challenging to deliver in the short term, but the prospect of their delivery is expected to improve during the plan period and beyond.
- 5.10 With good economic conditions all of East Lothian has proven marketable as a location for housing development, but less so as a location for economic development and significant job creation when compared to other better connected areas to the west of the city region: this may increase with distance from the city. The intentions of the current strategy remain valid, and the SDP requires the existing land allocations of the current local plan to be carried forward in to the new LDP. **However, a main strategy issue for the LDP is if, when seeking additional development land to meet the SDP’s requirements, the LDP should continue to follow a strategy that seeks to ‘disperse’ housing and economic development across the area, or if an alternative more ‘compact’ spatial strategy should and can be followed, at least in the short to medium term.**
- 5.11 The SDP requires new development to be directed to the most sustainable locations. Within this the scope for the LDP to consider strategy alternatives is limited by the SDP. SDP Policy 1A sets out thirteen Strategic Development Areas (SDAs) to which strategic development requirements should be directed. SDA (5) is within East Lothian and it follows the key transport corridors of the A1 and East Coast railway line. The LDP must prioritise this SDA as the area within which to find new housing and employment sites to meet the strategic development requirements of the SDP¹⁵. SDA (5) is illustrated at Figure 1 of the approved SDP¹⁶ and on the plan on the next page. It includes the following land and main settlements:

West of SDA	East of SDA
Musselburgh, Inveresk, Wallyford and Whitecraig	Haddington
Tranent, Prestonpans, Cockenzie and Port Seton	Dunbar, Belhaven and West Barns
Land at Blindwells	Land at Drem
Longniddry	East Linton

¹⁵ SESplan SDP Figure 2, Figure 4 and Policy 1A

¹⁶ SESplan, Spatial Strategy Assessment Technical Note: Appendix 1

East Lothian Strategic Development Area



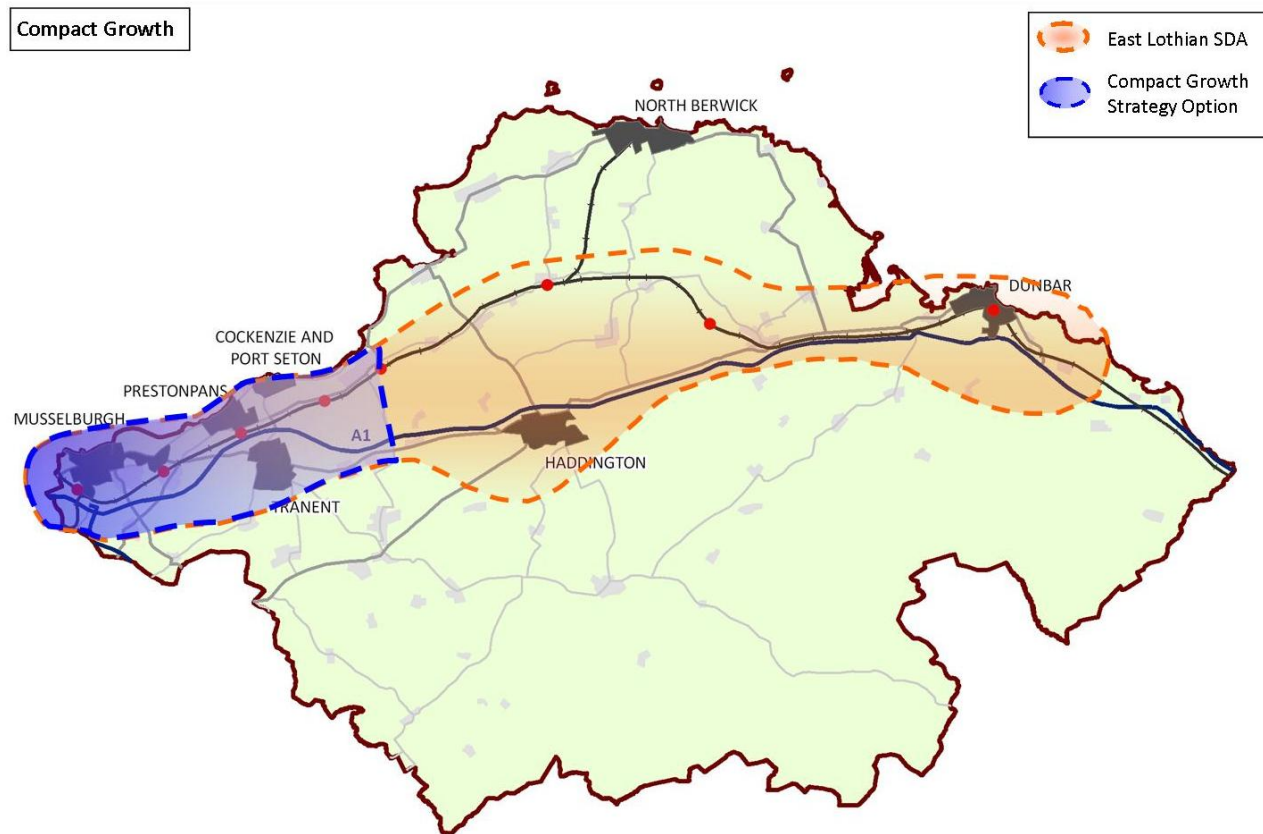
- 5.12** The East Lothian SDA excludes the area and settlements to the south of it (including the settlements of Ormiston, Pencaitland, Gifford and Stenton) as well as the area and settlements to the north of it (including North Berwick, Fenton Barns, Whitekirk, Tynninghame and all coastal settlements between Longniddry and West Barns)¹⁷. However, the approved SDP (Policy 7) also allows the LDP to identify greenfield sites for housing development outwith the SDA. Proposals promoted under SDP Policy 7 must be in keeping with the character of the settlement and local area, must not undermine green belt objectives, and any infrastructure required as a result of the development must be committed or funded by the developer. Similar considerations apply in respect of local employment sites. Nonetheless, the SDA is to be prioritised as the location for new land allocations.
- 5.13** As explained above, the SDP has set new housing land requirements to be met in East Lothian for the periods 2009 - 2019 and 2019 – 2024. The existing land allocations of the current local plan, including those discussed above, are part of the current strategy. Whilst they will contribute towards meeting the SDPs requirements recent economic conditions have delayed their development. In the preparation of the LDP the timescales within which these existing sites can contribute to meeting new housing and economic development requirements in each of the plan periods must be considered. Once the contribution from existing sites has been assessed, the next step is to consider how much more land will be needed for each of the plan periods and where and how it should be provided as part of the emerging spatial strategy for the area.
- 5.14** When doing this, the strategy must take in to account the overall character and appearance of the area, its environmental and infrastructure opportunities and constraints as well as its accessibility and regeneration opportunities. Importantly, it must also take in to account the resources available to implement the plan in the required timeframe. Another consideration is the anticipated improvement in economic conditions over time, and how this is likely to influence the ability to deliver development projects of different types and sizes in different locations across East Lothian. This includes the ability to fund and deliver the essential infrastructure such as new schools, transport infrastructure and the community facilities and water and drainage capacity that will be required to allow development to proceed.
- 5.15** The scale of development projects that are underway and that are being promoted in the area in recent times has generally reduced. However, a large scale housing project has started in Musselburgh in the west of East Lothian, close to where a significant amount of mobile demand for housing originates. The west of East Lothian is its most accessible part and closest to existing jobs and services in the wider city region and where there is most scope for regeneration. Smaller sites have come forward and are being promoted in other locations where demand exists further east.
- 5.16** Whilst economic conditions remain challenging, the outlook in to the medium and long term is more positive. The emerging spatial strategy needs to consider if and how it may adapt to any short term delivery issues so it can bring forward sufficient land in the right place using appropriate sites that

¹⁷ SESplan, Spatial Strategy Assessment Technical Note: Appendix 1

are capable of development to meet requirements in the relevant timeframes. It also needs to be guided by the willingness and ability of landowners / developers to make development happen in particular locations during the plan periods, including their ability and willingness to fund the infrastructure that will be needed to allow development to proceed. Confirmed developer interest in a site may also be an important consideration, particularly for the short term. Continuity must also be provided by retaining and potentially allocating appropriate new large scale development opportunities that are able to come forward throughout the plan period and potentially beyond.

- 5.17** The SDP identifies Blindwells as a location with significant long term growth potential. The current allocation seeks to prioritise the reuse of previously developed land with degraded landscape character over the development of greenfield land that contributes positively to the character and setting of existing settlements. Expansion further east beyond the current allocation at Blindwells may involve development of greenfield land at distance from any existing settlement. A comprehensive solution for the provision and appropriate phasing of infrastructure, services and facilities that will deliver a single new settlement at Blindwells is essential if the growth of the settlement beyond its current allocation is to be justified.
- 5.18** Blindwells presents an opportunity to create a large accessible mixed community in the middle of East Lothian. Importantly, the significant opportunity is to think creatively about its role and function relative to other settlements in the city region and within East Lothian, and how it should relate to other settlements and town centres in the area. The potential for an expansion of Blindwells, together with the scale, nature and phasing of development and additional land uses that may be promoted there, is to be considered as part of preparing the emerging LDP spatial strategy.
- 5.19** A key consideration relevant to any strategy approach will be to consider the infrastructure constraints and opportunities that exist and how they might be overcome. This will help inform the likely timescales within which development may take place, based on where and when new infrastructure solutions may be provided to make additional infrastructure capacity available. As such, it must also be demonstrated that there is a willingness and ability among landowners / developers to fund and help deliver infrastructure solutions.
- 5.20** Notwithstanding this, to meet the SDP's development requirements for East Lothian in the period up to 2019 and 2019 to 2024, there are broadly two spatial strategy options that could guide how the search for new land needed to meet the requirements set by the SDP for East Lothian could be carried out in this area. These are as follows:

1. **Preferred Option - Compact Growth:** Focus the search for new housing and economic development land on the main settlements within the west of the SDA, closest to the origin of demand adjacent to the city, and then consider those main settlements further east. Land may also be identified at settlements outwith the SDA if required.



2. **Reasonable Alternative – Dispersed Growth:** Promote a continuation of the current ‘dispersed’ spatial strategy. It would seek to share and spread additional development across East Lothian by focusing on the main settlements within the SDA. Land may also be identified at settlements outwith the SDA if required.

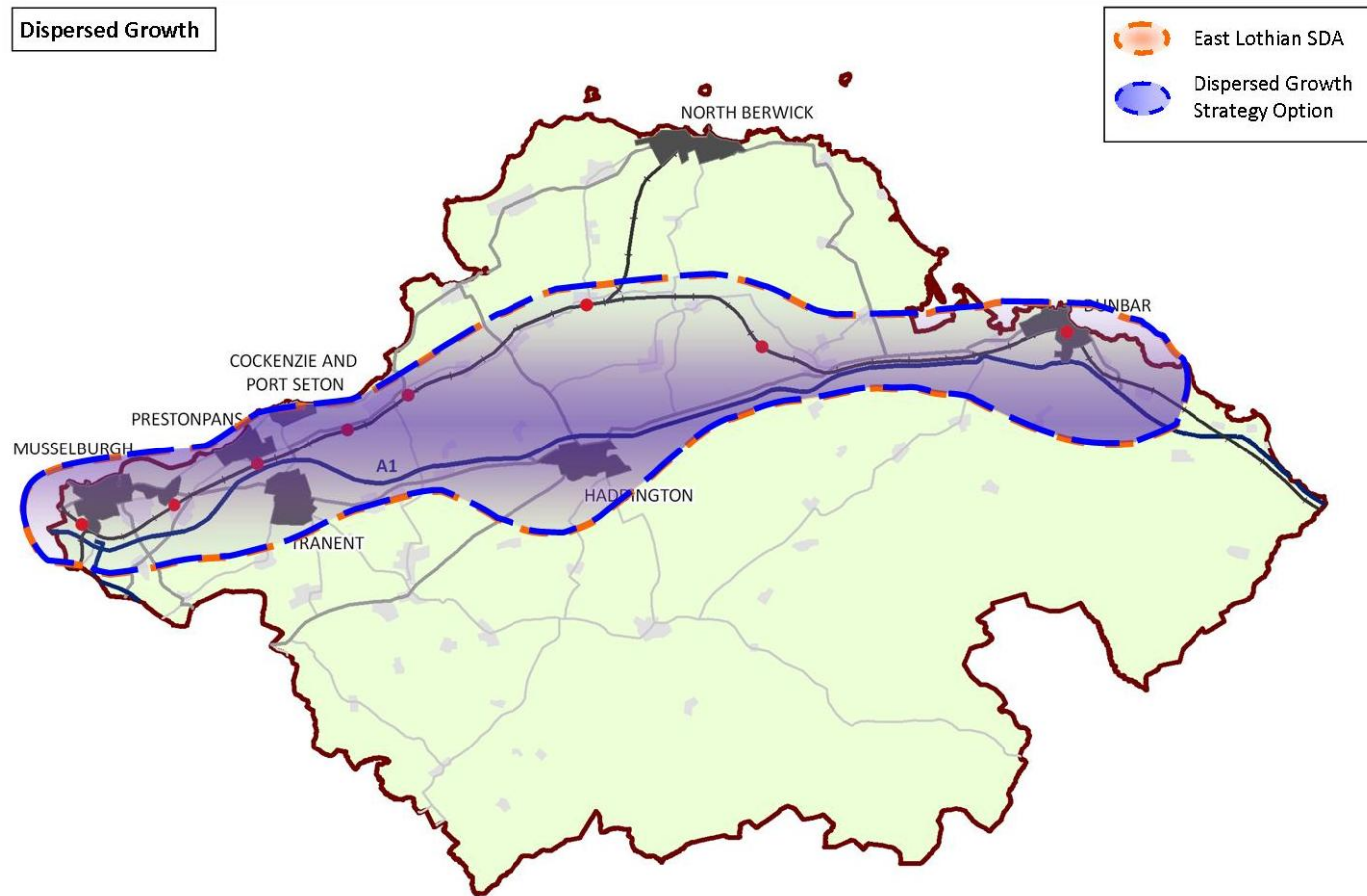


Table 5: Development Locations

<p>Preferred Approach</p>	<p>Compact Growth: Focus the search for new housing and economic development land on main settlements in the west of the SDA, closest to the origin of demand adjacent to the city, and then consider main settlements further east because:</p> <ul style="list-style-type: none"> – the Musselburgh area is the second most accessible area in the city region – the west of East Lothian is well served by frequent public transport, which becomes less frequent and more expensive further east – development in the west provides an opportunity to help reduce the need to and minimise the distance travelled as well as CO2 emissions and encourage the use of public transport – the west is where the majority of regeneration opportunities exist – it is a core part of Edinburgh Housing Market Area and Labour Market Area so the chance of delivering new homes and jobs there may be more likely – there is significant need and demand for new housing, including mobile demand and affordable housing, in this area – the west of East Lothian is nearer major existing employment locations and regional facilities – e.g. hospitals etc – capacity is available in strategic water supply and foul drainage infrastructure here so development in the west would not be constrained by a lack of this in short term – there may be opportunities in the west for appropriate Green Belt land release – e.g. where land contributes to green belt objectives to a lesser extent, or where there may be scope for regeneration, or where land is adjacent to public transport nodes (rail halts etc) – settlement coalescence would need to be mitigated – Blindwells is a key component of this option in the medium and longer term
<p>Reasonable Alternative</p>	<p>Dispersed Growth: Seek to share and spread additional development across East Lothian by focusing on all the main settlements in the SDA. This would:</p> <ul style="list-style-type: none"> – minimise Green Belt land release, even if land does not significantly contribute to green belt objectives, is accessible or if its development would help bring about regeneration – avoid the coalescence of settlements, but the impact of development on the landscape setting of settlements beyond the green belt would feature

- result in the expansion of main settlements in the SDA that have a wide range of existing services and facilities and are accessible by a range of transport modes, including public transport, but which are not as accessible as those in the west
- move away from the west where the majority of regeneration potential exists
- move away from the core of Edinburgh Housing Market Area and Labour Market Area, and result in a potentially reduced likelihood of delivering new homes and jobs
- result in a potential for mismatch between where the housing land supply is and where there is need and demand for new housing, including affordable homes
- move new development away from the most accessible part of East Lothian in regional terms and away from that part of it best served by public transport
- move further away from major employment and regional facilities – e.g. hospitals
- increase the need to and distance travelled as well as associated CO2 emissions
- overcoming foul drainage constraints in the east will take time
- Blindwells is a key component of this option in the medium and longer term

Question 3: Development Locations

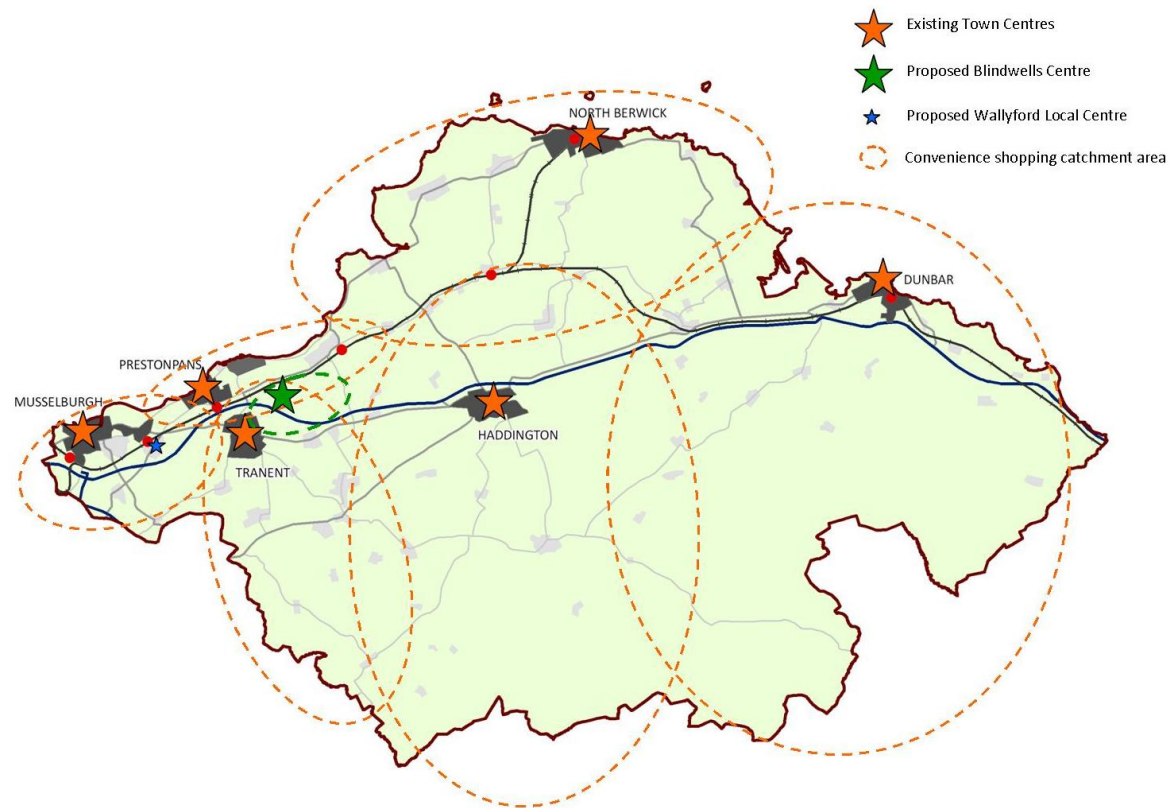
Of the two spatial strategy options, do you support the preferred (compact growth), alternative (dispersed growth), or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Town Centres

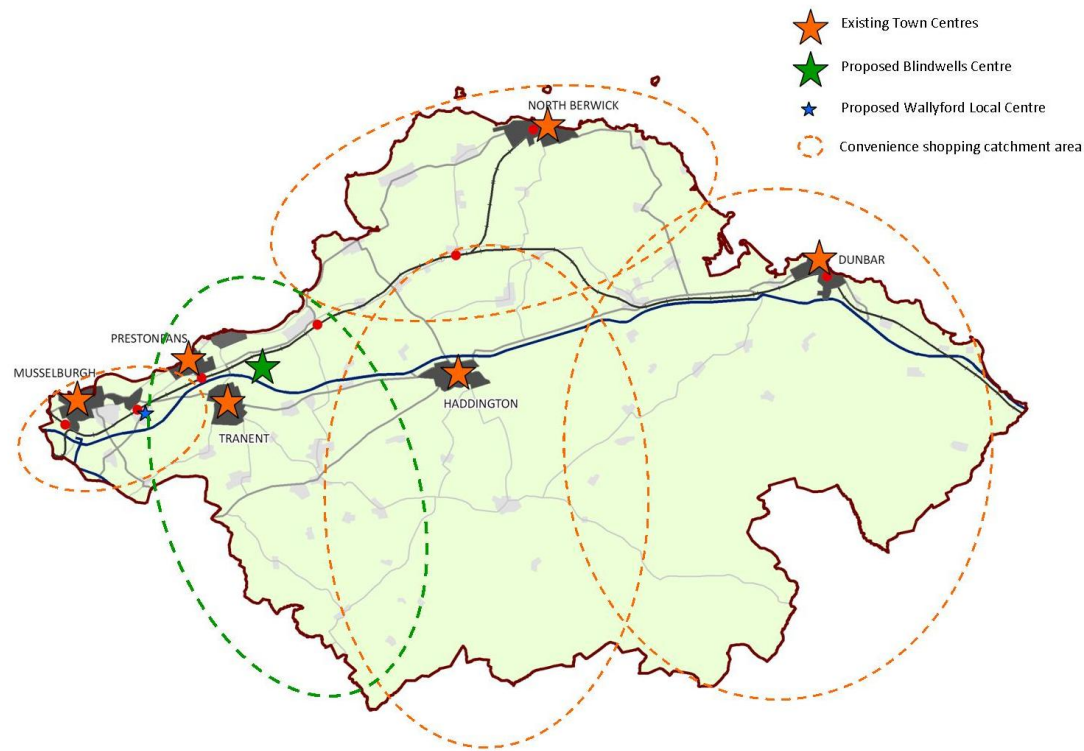
- 5.21** Scottish Planning Policy requires development plans to identify a network of town centres, commercial centres, local centres and neighbourhood centres etc as appropriate. Town centres are an important part of the settlement strategy, being a focus for a wide mix of land uses including employment, retail, local services and a range of cultural, leisure and other commercial and community facilities and housing. Town centres are service hubs for the population around them. They also contribute to a settlements sense of identity by providing a focus for civic activity as well as its self containment by providing access to employment, services and facilities locally.
- 5.22** Development plans may also establish a hierarchy of centres within the network, and seek to specify the role of certain centres relative to others in that hierarchy – e.g. identify a primary centre and / or main town centres that are supported by other local centres etc. The SDP identifies a hierarchy of strategic centres, none of which are in East Lothian. It requires the LDP to identify a network of town and any other centres in its area. Once this network is established, a sequential approach to the selection of locations for new retail and commercial leisure proposals is to be followed, consistent with SPP¹⁸ and Policy 3 of the SDP.
- 5.23** Musselburgh, Prestonpans, Tranent, Haddington, North Berwick and Dunbar make up the current network of town centres in East Lothian. There is also support for new local centres at Wallyford and at Blindwells (current allocation). A series of other neighbourhood centres exist within urban areas and are promoted within existing planned settlement expansions. Many of the smaller settlements also benefit from village centres and mixed use areas. There are no commercial centres (e.g. retail parks) in East Lothian and none are promoted by the current local plan. However, the SDP does allow the LDP to justify exceptions to the current approach, such as the introduction of a new town centre.
- 5.24** In this sense, the A1 (T) and city by-pass have improved accessibility and reduced journey times to other commercial centres outwith East Lothian. These include Fort Kinnaird and Straiton retail parks. These retail parks compete with East Lothian town centres and draw trade from them. This also generates vehicle based trips out of the area. There may be scope to improve the retail offer available to people in East Lothian and to claw back expenditure leakage from the area, in so doing helping to reduce the need to travel and transport based CO₂ emissions. This could also improve the provision of related services and facilities for East Lothian, by providing them more locally. Demonstrating this will involve the preparation of a retail capacity study and, from this, strategies for each of the existing town centres. These strategies will provide a vision for each town centre to help address local environmental issues as well as their vibrancy, vitality and viability. The strategies will be prepared once the LDP is operative, and will be carried forward as non-statutory guidance.

¹⁸ Scottish Government SPP paragraph 61-69

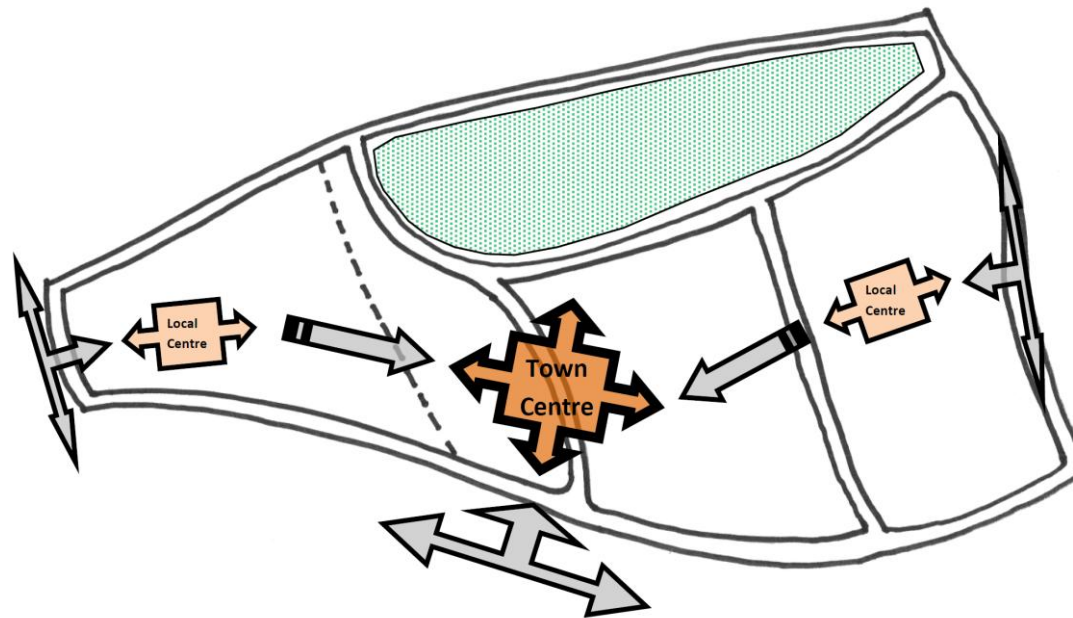


5.25 A new town centre or a town centre of a higher order – i.e. a higher order town centre is one that serves a much wider area than just the settlement in which it is located - may also be promoted by the LDP if justified. To promote such a new centre a retail capacity study would be required and an appropriate location would need to be found. The capacity study would identify an appropriate catchment area for any new town centre commensurate with its intended role relative to other town centres in the area. It would also recommend to the Council a scale of convenience and comparison retail floor space that could be accommodated without compromising strategic centres and other relevant centres within and outwith East Lothian. The role of any new town centre and the uses to be promoted there could be identified in this way.

5.26 The location selected for any new town centre must be consistent with the spatial strategy and the sequential approach set out in SPP. In terms of the spatial strategy, if Blindwells could expand it would provide the only suitable location for a new town centre. This would be the case under the preferred spatial strategy approach as well as the alternative. The same is true in relation to any higher order town centre. Blindwells is well located in East Lothian and is an accessible location nearby a significant amount of the area's population. The primary catchment area for any such new town centre may include existing town centres at Prestonpans and Tranent and also the settlements of Macmerry, Cockenzie, Port Seton and Longniddry. If a town centre of a higher order is supported then it may also include an extensive secondary catchment area covering the whole of East Lothian. However, if Blindwells can not expand, the LDP will not change the current network of centres.



5.27 In terms of the sequential approach, any new higher order town centre or town centre at Blindwells must be provided in the centre of the new settlement. There it could perform the role of a new town centre for Blindwells which, if appropriate, may also serve the surrounding area. If a new interchange with the A1 (T) is deliverable at Blindwells, this would bring clear accessibility benefits and may bring the possibility of earlier delivery.



5.28 Blindwells is to be a planned new settlement. If a new town centre is to be provided there that would serve the surrounding area this will not justify that it be provided anywhere other than at the centre of the settlement - a new freestanding, out-of-centre commercial centre is not supported. If any new Blindwells town centre is to perform a wider role, this must be taken in to account in any masterplan for the new settlement, including in respect of access, phasing, construction and in the development appraisal. Appropriate comprehensive solutions for any larger Blindwells Development Area would be required.

5.29 The LDP should identify a network and hierarchy of centres and their role and function. A key task in this will be to consider if there is any merit in introducing any new town centre at Blindwells that may remould and would complement the current network and hierarchy of centres in the area.

Table 6: Town Centres

<p>Preferred Approach</p>	<p>Promote a new town centre at Blindwells and also maintain current network and hierarchy of town centres: A retail capacity study would be prepared by the Council to define a hierarchy for the network of centres and their catchments. Based on these catchments it would also report on the ability of centres to support acceptable levels of retail floor space in future.</p> <p>Depending on the outcome of work on the expansion of Blindwells, a new town centre may be promoted there, which may also serve a wider area than the new settlement, if the scale and nature of growth and access solutions justify and support this. Appropriate catchment areas will be specified and an appropriate location would need to be found in the centre of the new settlement.</p> <p>The current hierarchy and network of town centres would be retained and strategies would be prepared to provide a vision for each town centre to help address local environmental issues as well as their vibrancy, vitality and viability. These strategies will be prepared once the LDP is operative, and will be carried forward as non-statutory guidance. Local centres at Wallyford and Blindwells (current allocation) would also continue to be supported. New local centres may be promoted at selected new locations too if appropriate.</p> <p>In relation to existing town centres the sequential approach would be followed.</p>
<p>Reasonable Alternative</p>	<p>Maintain current network and hierarchy of town centres: A retail capacity study would be prepared by the Council to define a hierarchy for the network of centres and their catchments. Based on these catchments it would also report on the ability of centres to support acceptable levels of retail floor space in future.</p> <p>The current hierarchy and network of town centres would be retained and strategies would be prepared to provide a vision for each town centre to help address local environmental issues as well as their vibrancy, vitality and viability. These strategies will be prepared once the LDP is operative, and will be carried forward as non-statutory guidance. Local centres at Wallyford and Blindwells</p>

(current allocation) would also continue to be supported. New local centres may be promoted at selected new locations too if appropriate.

In relation to town centres the sequential approach would be followed.

Question 4: Town Centres

Subject to the ability to expand Blindwells, do you support the introduction there of a new town centre (preferred approach)?

If so should it:

- a. serve only the new settlement; or**
- b. serve the new settlement and a wider area?**

Do you support retention of the current network and hierarchy of existing centres (preferred approach and reasonable alternative)?

Please explain your answers. If you support neither the preferred approach nor the reasonable alternative, what alternatives do you suggest?

The intention is to prepare strategies for each town centre, what ideas do you have for improving your town centre (please specify the town centre you are referring to in your answer)?

Planning for Employment

Employment Land Supply

- 5.30** SPP notes that LDPs should promote a range and choice of sites to meet the needs of different business sectors¹⁹. The approved SDP requires that 76 hectares of employment land be maintained in East Lothian²⁰. It also identifies four strategic employment sites in East Lothian²¹. These are the existing allocated sites at Craighall Business Park, Musselburgh and at Blindwells, Macmerry and at Spott Road Dunbar²². The SDP does not preclude a review of other sites currently proposed for employment use or the identification of new sites for employment.
- 5.31** The LDP may also consider if there are any circumstances where mixed use development on strategic employment sites, including support and ancillary services to employment uses, could be accepted in principle. Although normally to be resisted, opportunities to create mixed communities with housing and retail development alongside strategic employment opportunities may be considered in the preparation of the LDP. Any employment land lost from the supply must be augmented in the plan making process, meaning the quantity of employment land remaining on sites must be specified if a mix of uses is proposed.
- 5.32** There is scope for non-strategic employment sites to be removed, added and / or promoted for mixed uses. Existing strategic employment proposals and / or new strategic employment proposals may be made more flexible concerning the mix of land uses that can be developed. For all employment sites alternative policy approaches may be followed, for example in respect of support and ancillary services to employment uses, including in relation to existing operational employment areas. However, 76ha of employment land must be retained in the area.
- 5.33** Although the current East Lothian Local Plan 2008 allocates a substantial amount of land for employment use, very little of this has been developed. Much of this land is in the control of parties seeking to develop the land for alternative uses: in addition, the scale of demand and potential users are unlikely to deliver the investment needed to achieve the servicing and delivery of employment on much of this land. Much of this land has remained undeveloped through successive development plans whilst some has been developed for uses other than employment, including housing.

¹⁹ Scottish Planning Policy paragraph 93 - 105

²⁰ SESplan SDP paragraph 93 - 96 and Policy 2

²¹ SESplan SDP Figure 8

²² SESplan SDP Economy Technical Note paragraph 5.3

5.34 A significant challenge for the Council and for the LDP is to increase the job density in the area and to ensure that opportunities for job creation and economic growth are generated alongside an increase in population and the delivery of new homes. It may be that housing has an enabling role to play on some sites to ensure that serviced employment land is released for employment growth and job creation, alongside housing.

Table 7: Planning for Employment

<p>Preferred Approach</p>	<p>Promote mixed use strategic and local employment sites where appropriate: Maintain the quantity of the current employment land supply, and review the contribution that existing employment proposals make to this supply. This review would consider:</p> <ol style="list-style-type: none"> 1. Whether or not existing employment proposals should remain allocated for employment use either in whole or part, or in the case of non-strategic employment proposals not at all; 2. If any non-strategic employment proposal is no longer considered appropriate solely for employment use what alternative mix of uses would be appropriate, or if it should no longer be promoted for any type of development; 3. If any employment proposal is to be retained only in part for employment use, the mix of employment and any other land uses it is suitable for must be specified by the LDP. Any such proposal must guarantee the servicing of, development and release of the remaining part of the employment site, or the same in relation to any replacement employment land, for employment use. The area of land remaining for employment use would need to be specified and defined on the proposals map, together with the area of land and other land use(s) for which the remaining part of the site could be developed. Those parties promoting mixed use development on sites must specify and agree with the Council the area and part of the site that would be made available for employment use. Delivery mechanisms and timescales for the release and servicing of the employment land would also need to be set out by the LDP. <p>New employment proposals may also be identified. These could be solely for employment use or may be for a mix of employment and other uses. If a mix of uses is promoted in association with a new employment proposal the approach to this must follow the same principles as set out at point 3 above.</p> <p>In all circumstances the location for the proposed employment uses, and / or mix of employment uses and other uses, must be appropriate and be able to co-exist satisfactorily and with those others uses proposed and / or that exist in the area. If any housing land were released as a result of this review then that housing land would contribute towards strategic housing land requirements.</p>
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	The degree of policy support would be extended for ancillary non-employment uses on employment proposals and / or existing areas designated for employment to include support services as well as retail activity ancillary to the main employment use.
Reasonable Alternative	<p>Maintain strategic employment sites for employment but promote mixed use local employment sites: Maintain the quantity of the current employment land supply. Retain all existing strategic employment sites as they are. Only review the contribution that existing non-strategic employment sites make to the supply. In relation this review the same approach would be followed as for the preferred approach as relevant.</p> <p>The degree of policy support would be extended for ancillary non-employment uses on employment proposals and / or existing areas designated for employment to include support services as well as retail activity ancillary to the main employment use.</p>

Question 5: Planning for Employment

Do you think that the review of the employment land supply should be as set out under the preferred approach, alternative approach, or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Planning for Housing

The Housing Requirement and Need for Additional Housing Land

- 5.35** SPP notes that LDPs should provide a generous land supply and promote a range and choice of sites to meet housing requirements²³. The approach to planning for housing in East Lothian must align with the SDP and its associated Supplementary Guidance on Housing Land. In addition to setting housing requirements these documents note East Lothian’s commuting travel pattern, its low job density, the concentration of available employment in the city, the focus of demand for housing particularly in the west of East Lothian and the constrained infrastructure and transport capacity, as well as the need to consider the capacity in existing settlements and their landscape settings to absorb strategic growth.
- 5.36** Policy 5 of the approved SDP together with its associated Supplementary Guidance on Housing Land requires the LDP to ensure land is available for the delivery of 6,250 dwellings in the period 2009 to 2019 as well as for a further 3,800 dwellings in the period 2019 - 2024²⁴. In total, land which is effective or capable of becoming effective is needed to ensure 10,050 dwellings can be developed in the period 2009 to 2024. The SESplan HoNDA also suggest that housing land able to accommodate in the region of a further 3,820 dwellings may be needed in East Lothian for the period 2024 – 2032, although the SDP does not require land to be allocated by the LDP for the period beyond 2024.
- 5.37** Since 2009, the base date of the SDP, 1,321 dwellings were completed in East Lothian up to 2013. In addition, at 2013 the area had a significant amount of allocated and available housing land which would allow the development of a further 6,332 new homes. In total, this amounts to land for 7,653 homes. The SDP requires the LDP to retain and focus on the delivery of this established housing land²⁵. The SDP is also clear that new housing land allocations brought forward by the LDP must complement and must not undermine the ability to develop existing housing land allocations.
- 5.38** The proportion of the established land supply that is ‘effective’²⁶ and the programming for its development through time will influence the amount of new land that the LDP needs to find for each plan period to meet the SDPs housing requirements. Based on the agreed 2013 housing land audit, additional land capable of delivering around a further 2,000 homes up to 2019 and around a further 1,650 homes in the period 2019 – 2024 would be needed in addition to existing sites²⁷. The established housing land supply could also deliver around 1,200 homes beyond 2024.

²³ Scottish Planning Policy paragraphs 109 -125

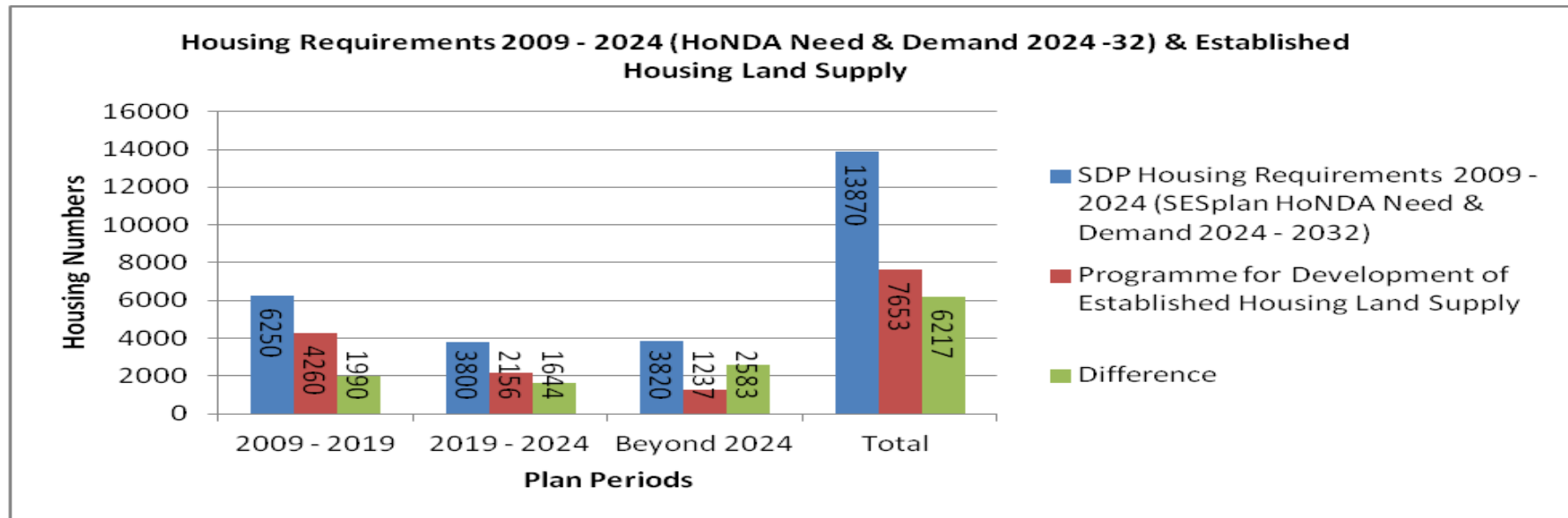
²⁴ SESplan SDP Policy 5 & Consultative Draft SG on Housing Land Table 3.1

²⁵ SESplan SDP paragraph 108 and 55

²⁶ See Appendix 1 for further information on the concept of an effective housing land supply

²⁷ Based on Housing Land Audit 2013

- 5.39 However, the programming of house completions from sites means that land with a total capacity of more than 10,050 homes will be required. This is because not all of the capacity of individual sites will be built out within the plan periods: it is the cumulative output from a range of different sites that will be needed; the development of some sites may also extend well beyond the plan period. A generous housing land supply will be needed to allow the housing requirement to be met. However, the rate of development that will be delivered is not within the control of the planning authority, as this is dependent on many other factors, including the strength of the housing market. Delivering enough dwelling completions to meet the SDP's housing requirement will require a rate of annual completions in East Lothian well over double the highest rate which has ever been achieved in the past. Yet there is a need to make sufficient housing land available that could allow the housing requirement to be met, consistent with the SDP.
- 5.40 Allocating the right amount of housing land in the right place will be a significant and challenging task for the LDP. Residential development is the single biggest urban land use. It generates many other 'spin-off' development requirements as well as demand for other land uses and additional capacity in infrastructure and services to accommodate the impacts population growth brings. The location of new housing relative to employment opportunities and services also influences the need to travel and the distance that need be travelled to access them. Given the nature of East Lothian and its settlements, it is likely that greenfield land will be needed to meet the vast majority of the SDP's strategic housing land requirements.



Spatial Strategy Implications

- 5.41 The preferred ‘compact’ spatial strategy would focus the search for new housing land in the short to medium term on the main towns in the west of East Lothian’s Strategic Development Area (SDA) as far as it reasonably can. However, this is subject to the availability of appropriate sites and infrastructure capacity, and the ability to fund and deliver increased capacity in view of the resources available to implement the plan. SDP Policy 5 requires the LDP to indicate the phasing and mix of uses for sites, where appropriate.
- 5.42 However, SDP Policy 7: Maintaining a Five Year Housing Land Supply also allows the LDP to allocate greenfield land for housing development either within or outwith the SDA²⁸. SDP Policy 7 may be applied to any settlement in East Lothian. Any proposal promoted under SDP Policy 7 must be in keeping with the character of the settlement and local area, must not undermine green belt objectives, and any infrastructure required must be committed or funded by the developer. In the preparation of the LDP the application of SDP Policy 7 is discretionary.
- 5.43 Importantly, there is a need to select different site types and sizes for new housing. This is because smaller sites may be more deliverable to meet short term requirements to 2019, whereas larger sites tend to have longer lead-in periods and are likely to contribute more significantly towards requirements in the period 2019-2024. In the preparation of the LDP it will be important to select appropriate sites which, when developed together, can ensure an effective housing land supply can be maintained at all times to meet the requirements up to 2019 and in the period 2019 - 2024. This will require an appropriate balance between the provision of appropriate large and smaller scale sites.
- 5.44 Overall, it must be demonstrated that, at the point the LDP is to be adopted, sufficient housing land will be available to meet the SDP’s housing requirements and to maintain a five year effective housing land supply. The search for land to meet these objectives is to be focused on the SDA. Yet environmental and infrastructure constraints in the SDA, the resources available to implement the plan, or the need to ensure existing committed sites are complemented and not undermined, may mean that the search for land to maintain a 5 year effective housing land supply needs to extend outwith the SDA. The contribution to the housing land supply that any SDP Policy 7 allocation would make will also contribute towards meeting the SDPs housing requirements. **At this stage, the Council’s preferred and alternative housing sites to meet the SDP’s housing requirements to 2019 and to 2024 and to maintain an effective five year housing land supply are set out in the cluster analysis section that follows this section. A summary of the analysis is set out at paragraph 6.112 in Table 26. It shows how the SDPs housing land requirement might be met using the preferred MIR sites. However, those parties promoting potential development sites must prove the effectiveness of their sites to the Council’s satisfaction before any site may be included in the Proposed LDP.**

²⁸ SESplan SDP paragraph 116 and Policy 7

Blindwells Role in Meeting Housing Requirements

- 5.45** The approved SDP has a long-term vision for Blindwells new settlement: this is the creation of a large scale new mixed community that will contribute to meeting housing land requirements up to 2032 and beyond. The SDP requires the LDP to seek comprehensive solutions that may allow the new settlement to expand from its current allocation of 1,600 homes to around 4,600 homes. If comprehensive solutions are found for a larger new settlement, this would allow the likely scale of the new settlement to be confirmed and an area of land to be identified within which development of a larger new settlement may take place²⁹. As such, this MIR identifies a ‘Blindwells Expansion Area of Search’ as the area for which comprehensive development solutions for a potential larger new settlement should be investigated. The SDP also notes that the principles of the current Blindwells local plan proposal may need to be reviewed as part of this.
- 5.46** The approved SDP expects that Blindwells need only contribute housing land to its spatial strategy after 2019. It expects no more than the numerical requirement for 1,600 homes already allocated to the new settlement to be delivered by 2032³⁰. Notwithstanding this, if comprehensive solutions for the delivery of the entire and potentially larger new settlement are found³¹ the SDP would not preclude more housing land being developed within any Finalised Blindwells Development Area in the short to medium term. The LDPs MIR has a key role in highlighting and creating the context for consulting on potential development strategies and seeking to find comprehensive solutions that would be required to finalise any larger Blindwells Development Area, including how these options will impact on the timescales within which it can deliver housing land through time. This will inform the approach to Blindwells set out in the Proposed LDP.
- 5.47** Importantly, the implication of not being able to bring forward housing land at Blindwells in the short to medium term may be an increased need to identify greenfield land for housing elsewhere in East Lothian in order to meet housing requirements. This land would likely need to be found around existing settlements. The implication of expanding the current Blindwells allocation without a clear comprehensive strategy and agreed solutions for how a single new settlement can be delivered would bring the same implications for the use of greenfield land but may also result in piecemeal development in the open countryside. This would undermine the SDPs vision for Blindwells.
- 5.48** The possible policy and strategy approaches for Blindwells are discussed further in the Cluster Analysis Section that follows this section.

²⁹ SESplan SDP paragraph 53

³⁰ SESplan SDP paragraphs 53-54

³¹ SESplan SDP Paragraph 53

Consideration of Housing Development Beyond 2024

- 5.49** The approved SDP ‘signposts’ that housing land for around an additional 48,000 homes may be needed in the SESplan area in the period 2024 – 2032. On the basis that allocated land may continue to be developed during that period, the strategy for delivering a proportion of those 48,000 homes is likely to align with the current SDP strategy³². However, the SDP does not specify any housing requirement for East Lothian that needs to be met in the period 2024 - 2032. Yet the SESplan HoNDA signposts in the period 2024 – 2032 there may be a need and demand for a further 3,820 dwellings in East Lothian. The SDP also suggests that the LDP may be able to identify opportunities for growth beyond 2024.
- 5.50** Any opportunities for housing development beyond 2024 in East Lothian may be limited in scale at this stage to that which can be delivered on existing allocated sites that are not expected to be fully developed by 2024. Blindwells is a location that is intended to have such a role post 2024, which may be enhanced if comprehensive solutions for development of a wider area are found. The SDP is also clear that sites may be safeguarded for future housing development post 2024. This may also be relevant to Blindwells (if comprehensive solutions are not found) as it might to other sites that may logically be safeguarded for potential housing development in the longer term. However, the LDP may allocate sites that can contribute to housing requirements to 2024 and beyond if they are of a size that could continue to be developed beyond 2024. This may be particularly relevant if any such larger sites offer more appropriate locations for development than smaller sites able to be fully or substantially completed by 2024. However, this may result in a substantial over allocation of housing land in East Lothian above the SDP’s confirmed housing requirements to 2024. Notwithstanding this, it may be that the delivery of additional homes beyond 2024 in East Lothian could substantially provide for any part of the city region’s future housing requirement that may be directed to East Lothian post 2024 in the review of the current SDP.
- 5.51** However, planning for the longer term in advance of the review of the current SDP, and in isolation from a comparative analysis of environmental and infrastructure opportunities and constraints across the city region, may result in the misdirection of development and scarce recourses. For example, in the review of the SDP, SESplan may seek to direct any additional growth in the city region to locations west of East Lothian that are or will become more accessible during the next SDP period or that contain or are closer to more employment and better transport opportunities than currently available in East Lothian. There may also be more scope in the city region than currently anticipated to prioritise the redevelopment of brownfield land and / or the form of the green belt may change. Importantly, NPF3 notes that the longer term spatial strategy for the city region as a whole needs to acknowledge and address the city regions infrastructure constraints. However, setting out a longer term spatial strategy for East Lothian in the emerging LDP may provide a context to help find technical and funding solutions for the provision of additional infrastructure capacity here in the short, medium as well as in to the longer term.

³² SESplan SDP paragraph 112 & Table 2

Table 8: Planning for Housing

<p>Preferred Approach</p>	<p>Plan for a longer term housing strategy: Conform to the approved SDP and identify land which is able to be developed to deliver 6,250 homes to 2019 and a further 3,800 homes in the period 2019 – 2024, but do not limit the scale of land release to that which is needed to meet only those requirements.</p> <p>The preferred approach is also to find land within which an expanded Blindwells could be developed, subject to appropriate phasing and comprehensive solutions being found. Otherwise potential expansion land may be safeguarded. In addition, subject to infrastructure capacity, funding solutions and appropriate delivery mechanisms being found, identify appropriate new sites which can help meet housing requirements to 2019 and in the period 2019 - 2024 that help maintain an effective five year housing land supply even if their development would extend beyond 2024.</p> <p>The selection of new sites to meet the SDPs housing requirement for 6,250 homes to 2019 and a further 3,800 homes in the period 2019 – 2024 would generally be guided by the following priorities:</p> <ul style="list-style-type: none"> • Intensify existing allocations that are located in the SDP’s SDA if their capacity can be increased and provided development of the additional homes can start during the LDP period; • Identify other appropriate new land in, or as an expansion of an existing settlement / expansion of an existing allocation, prioritising locations within the SDA, but also include consideration of land outwith the SDA if required to maintain an effective five year housing land supply. New allocations could be of varying sizes, provided they can start and be substantially completed in the LDP period and do not undermine existing allocations or any expansion of them; • Allocate a Blindwells Development Area, including the area of the current local plan proposal, as well as any other land within which a further expansion could be supported and / or safeguard as appropriate; • Safeguard other land for future consideration – e.g. because it is a logical expansion of an existing allocation but development of any further expansion land would be unlikely to start or would be inappropriate if it did start during the LDP period;
<p>Reasonable Alternative</p>	<p>Plan to meet known housing requirements: Conform to the approved SDP and identify land which is able to be developed to deliver 6,250 homes to 2019 and a further 3,800 homes 2019 – 2024 prioritising locations within the SDA, but limit the scale of land release in so far as possible to that which is needed to meet only those requirements. This approach would also seek to identify land within which an expanded</p>

Blindwells could be developed, subject to appropriate phasing and comprehensive solutions being found, otherwise potential expansion land should be safeguarded. An effective five year housing land supply would be maintained at all times.

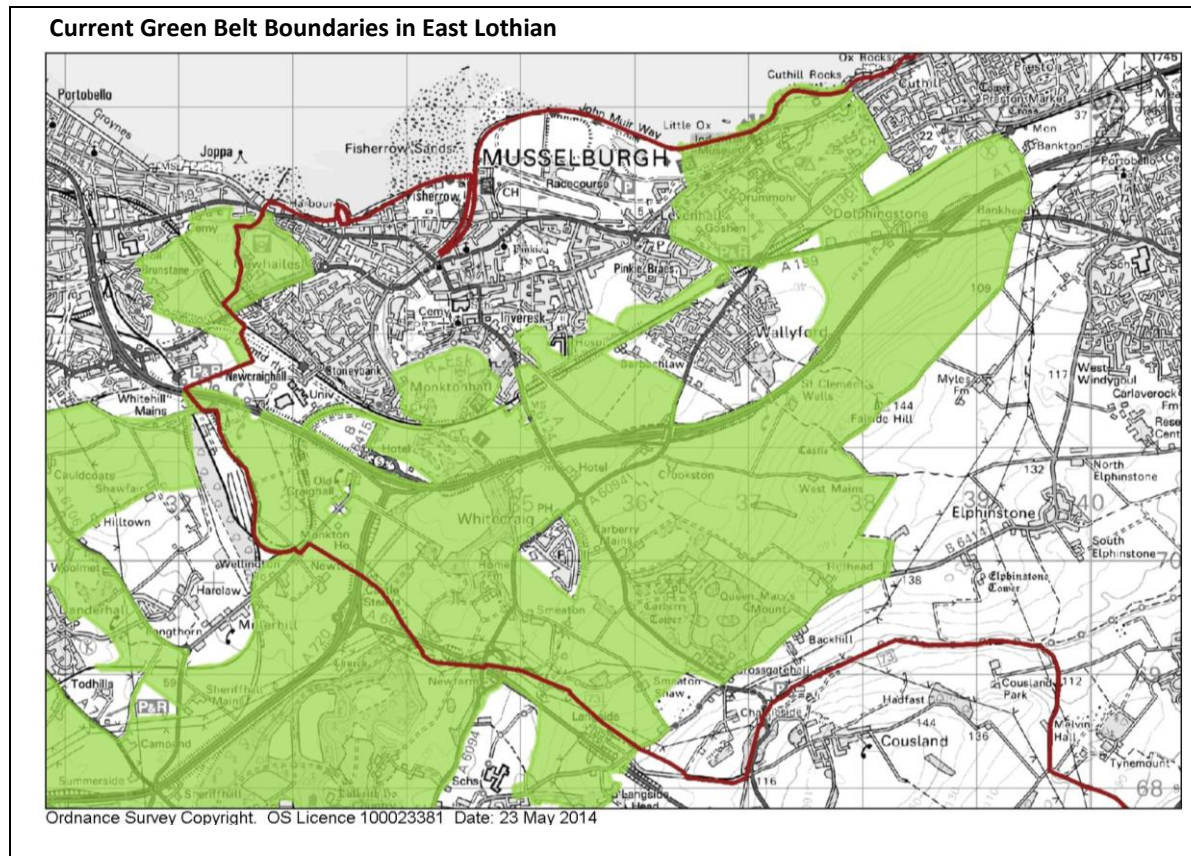
Question 6: Planning for Housing

Should the LDP plan for a longer term settlement strategy to meet the SDPs housing requirements as well as help contribute to signposted need and demand for housing post 2024 (preferred approach), or should it plan only to meet the SDPs confirmed housing requirements to 2019 and 2024 (alternative approach), or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Green Belt

5.52 Edinburgh Green Belt boundaries within East Lothian are to be defined by the LDP, and may be modified if appropriate to ensure that the strategic growth requirements of the SDP can be met. However, existing green belt boundaries do not need to be modified in East Lothian since East Lothian's SDA extends beyond the Green Belt. The plan below illustrates the current Green Belt Boundaries in East Lothian.



5.53 The SDP acknowledges that the green belt is an important policy for protecting and enhancing landscape character and settlement identity and for providing access to open spaces. It can also be used to support regeneration by directing planned growth to the most appropriate locations. In certain circumstances the coalescence of settlements may be accepted, for example if this would lead to a more sustainable settlement pattern. Policy 12 of the SDP does not provide for new green belts to be designated; however, it makes clear the requirement to maintain a green belt around Edinburgh and to minimise the impact of accommodating growth on green belt objectives. To assist with this, a landscape based review of the Edinburgh Green Belt was carried out in 2008. It identified certain parts of the Edinburgh Green Belt that contribute to a lesser degree to green belt objectives. There are also certain green belt locations that are well related to strategic transport corridors and public transport opportunities.

5.54 In addition to green belt objectives, the LDP must also consider the effect of directing growth beyond the green belt, particularly housing. Directing growth beyond the green belt may: increase distance between new homes and the existing main centres of employment and available jobs in the wider city region; move development away from where there is greatest pressure to satisfy the majority of mobile demand for housing; generate a need to commute longer distances, including by private car, and increase transport based CO₂ emissions; result in regeneration opportunities being missed. These matters need to be considered as part of the spatial strategy and when selecting sites. Existing settlements are to be excluded from the Green Belt as should major educational and research uses, and any major business and industrial operations. This will have implications for how green belt boundaries are defined. The LDP must also specify the types of development that will be appropriate within the green belt.

Table 9: Green Belt	
Preferred Approach	<p>Modify the boundaries of the Edinburgh Green Belt: Only release land from the green belt for new built development in the following circumstances:</p> <ul style="list-style-type: none"> • If it is justified by a need to accommodate strategic development requirements and it would direct development to more suitable sites than could be achieved beyond the Green Belt, such as where regeneration can be promoted and / or where public transport accessibility is good; and • If the coalescence of settlements would be a consequence, then this will only be supported if the advantages of the site in question clearly outweigh those of other sites and the resultant loss of settlement identity that would arise from its development; and • If new long term and defensible green belt boundaries could be defined.

	Where land is released from the green belt every effort must be made in the subsequent master planning process to ensure the introduction of green corridors, wedges, open spaces and woodland planting etc, particularly if coalescence of settlements is accepted as a justified part of the settlement strategy and, where appropriate, to define new defensible green belt boundaries. No change to be made to the uses and type of development that would be considered appropriate in the green belt.
Reasonable Alternative	Do not modify the boundaries of the Edinburgh Green Belt: Promote no change to green belt boundaries and make no change to the uses and type of development that would be considered appropriate in the green belt.

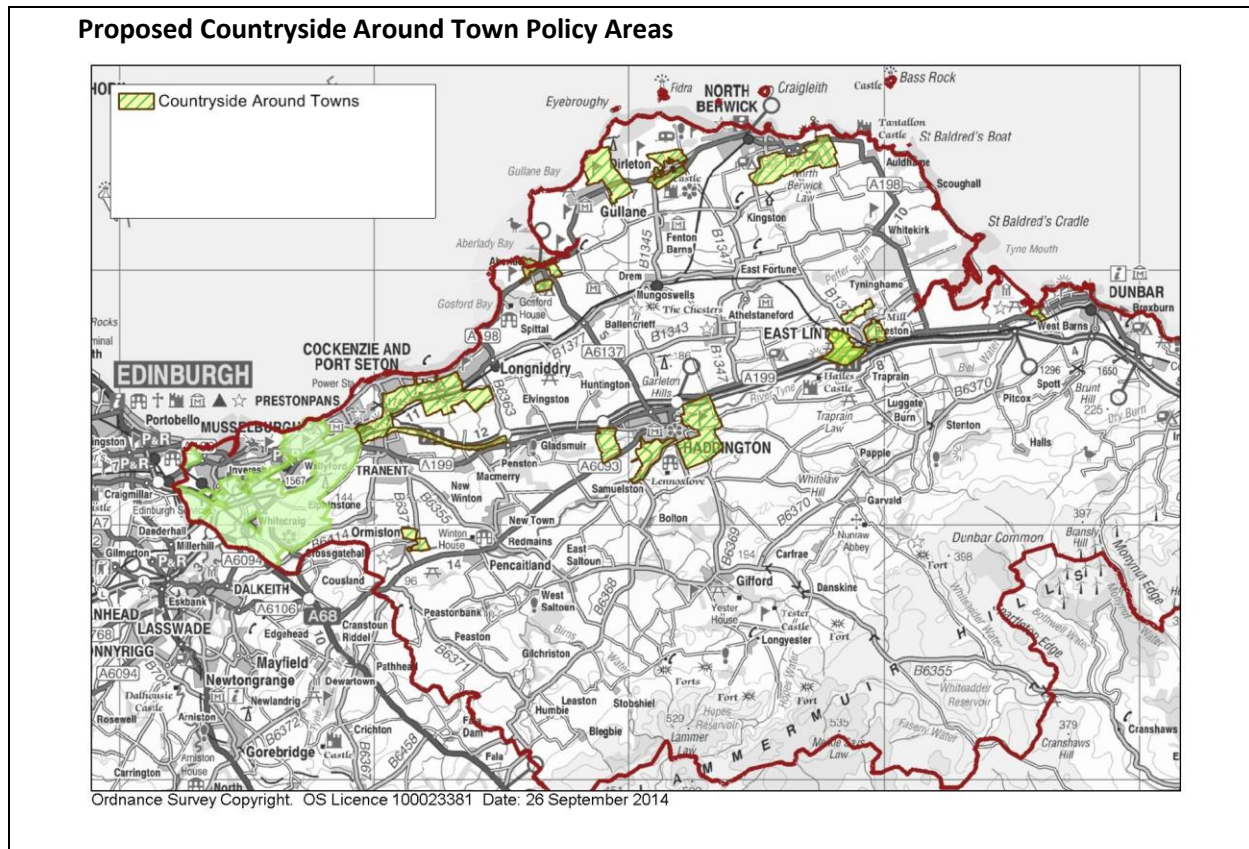
Question 7: Green Belt

In terms of the approach to green belt, do you support the preferred approach, the reasonable alternative, or neither?

Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

Countryside Around Towns

5.70 There are a number of areas beyond the green belt which have been the subject of development pressure for many years, but which in the Council's view would be better left open and undeveloped because they are important to the character of the local area. These are illustrated on the map below and at Appendix 5:



- 5.71 Whilst these areas may be important to the setting and identity of settlements and / or to provide a setting to other landscape features, a green belt designation over them would be inappropriate. This may be because the current green belt could not be reasonably extended in to those areas, or because they are some distance from the current green belt. The SDP does not promote the designation of new green belts.
- 5.72 The SDP supports the creation of other countryside designations which would perform a similar role to a Green Belt designation, such as Other Countryside Designations / Countryside Around Town Designations³³. The LDP may consider and justify if there is a role for any such designations in its area, explaining what this is intended to achieve and identifying where any such designations would be applied.
- 5.73 In addition to seeking to retain separation between communities and /or retain an appropriate landscape setting for them or for other important landscape features, one reason to promote this type of policy would be to clearly identify in advance locations where, in the Council’s view, Policy 7 of the SDP should not be applied.
- 5.74 Any opportunities to contribute to the objectives of the Central Scotland Green Network are also to be identified in association with such new policy designations.

Table 10: Countryside Around Towns

<p>Preferred Approach</p>	<p>Introduce Countryside Around Town designations: Such designations could be promoted where the setting and identity of settlements or landscape features not in the green belt merit protection from significant built development. A new policy would be introduced to define the types of development which should be resisted in such areas unless there are exceptional circumstances, such as for essential infrastructure, or for community uses which would not compromise the setting of the settlement or landscape feature, or where a proposed development would complement the feature to which the designation relates, or where the proposal would effect landscape improvement, including contributing towards CSGN objectives. This approach could be followed including in the following locations:</p> <ul style="list-style-type: none"> • The land beyond the green belt between Tranent/ Macmerry/Prestonpans/ Cockenzie / Port Seton, Longniddry, Blindwells, and St Germain;
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³³ SESplan SDP Policy 13 and paragraph 132.

	<ul style="list-style-type: none"> • Around North Berwick Law, between it and the planned new southern edge of the town; • To the south, west and east of Haddington; • Between Dunbar and West Barns; • Villages including Ormiston, Aberlady, Gullane, Dirleton and East Linton. <p>Such a designation would imply greater permanence to the presumption against built development in those locations than might the application of a countryside designation. Potential Countryside Around Town policy areas are shown at Appendix5.</p>
Reasonable Alternative	Do not introduce Countryside Around Town designations.

Question 8: Countryside Around Towns

In terms of the potential to introduce Countryside Around Town designations as a new policy approach, do you support the preferred approach, the reasonable alternative, or neither?

Please explain yours answer. If you support neither of the above options, what alternatives do you suggest?

Central Scotland Green Network (CSGN)

5.75 The Central Scotland Green Network (CSGN) is a national development set out in NPF3. The LDP must therefore support CSGN objectives and identify opportunities to implement it in East Lothian. CSGN aims to bring about a step change in environmental quality, woodland cover and recreational opportunities in the area, and to seek connections through it with adjoining areas for the movement of people and wildlife. The Green Network should also complement other initiatives or policy objectives, such as green belt or any potential countryside around town designations. SPP also emphasises planning's role in enhancing green infrastructure.

5.76 SESplan requires the LDP to identify opportunities to contribute to the development and extension of the CSGN in to East Lothian. This should be considered an integral part of place making and this should help to optimise the delivery of a range of economic, social and environmental benefits. Major developments should contribute towards the CSGN and connectivity over local authority boundaries is to be sought. SESplan identifies some strategic CSGN opportunities for East Lothian and these are noted below:

- Edinburgh City Bypass: there is a need to address connectivity for species and active travel across the bypass
- Esk Valley opportunities: key woodland habitat network project in the North and South Esk Valley
- Shawfair/Edinburgh South East Wedge (although in Midlothian there are links to East Lothian)
- Wallyford – Tranent: opportunity for network enhancement through delivery of development
- Blindwells: opportunity for network enhancement through delivery of development
- Potential upgrade of the A1 along the coast – project related to transport with consideration of green network objectives
- Development of the John Muir Way and formalisation of the round the forth cycle route and No 1 Cycle route
- Forth Estuary – opportunity for landscape scale inter-tidal habitat restoration project
- Opportunities for riparian planting in East Lothian to meet RBMP objectives

5.77 The CSGN to be a multifunctional network of green and blue spaces (e.g. rivers and ponds etc) connecting our towns and villages with the wider countryside and coast. It is to include areas important for recreation, active travel, biodiversity and landscape character. The proposed overall aim for the CSGN in East Lothian is “to create a network which connects habitats and communities, improves access to the countryside and the coast, and enhances the character and appearance of the area”.

- 5.78** At this early stage existing assets which could contribute to the creation of a green network have been examined. These include active travel routes such as Core Paths, Sustrans Cycle Routes, Rights of Way and recreational routes such as the Railway Walks. For biodiversity, international, national and local sites were considered, along with woodland, wetland and grassland areas. Popular outdoor recreational destinations were also identified, such as woodlands, beaches, hills, riverside walks, John Muir Country Park and Levenhall Links.
- 5.79** Based on this initial survey and the consideration of related opportunities, locations which do or could contribute to a green network were identified. Particular attention was given to those areas where multiple benefits could be secured, for example, where recreational routes lead to the coast as well as provide habitat value, and where there may be opportunities to connect multifunctional areas. The plan on the following page shows the outcome of this initial work and illustrates an indicative framework against which more detailed work on the green network in East Lothian could be progressed.
- 5.80** It is likely that a strategy plan of this nature would be included in the LDP, but the detail reserved for Supplementary Guidance. This is because there would be too much detail to include a strategy for the Green Network in the plan itself and it should complement SESplan's Green Network Strategy once it is in place³⁴. The SG would follow the same approach as set out above and would draw on and seek to align with other relevant strategies such as the Core Path Plan and Biodiversity Action Plan. It would identify the green network opportunities in detail for each cluster area including where strengthening is needed.
- 5.81** The main function of the green network may be different in different cluster areas. For example, in Musselburgh it may be more important to promote good quality active travel, while in Dunbar access to the coast and countryside for recreational purposes may be more to the fore. In addition, when setting down development principles for sites, including in any Supplementary Guidance prepared for them, the LDP could require CSGN objectives to be furthered, for example by ensuring that structure planting is provided in association with new development and that it is designed to make effective habitat links through a development site and to the surroundings; by replacing trees that need to be removed to facilitate development; requiring the creation of active travel routes and by realising opportunities to improve habitat.

³⁴ SESplan SDP Action Plan Action 106

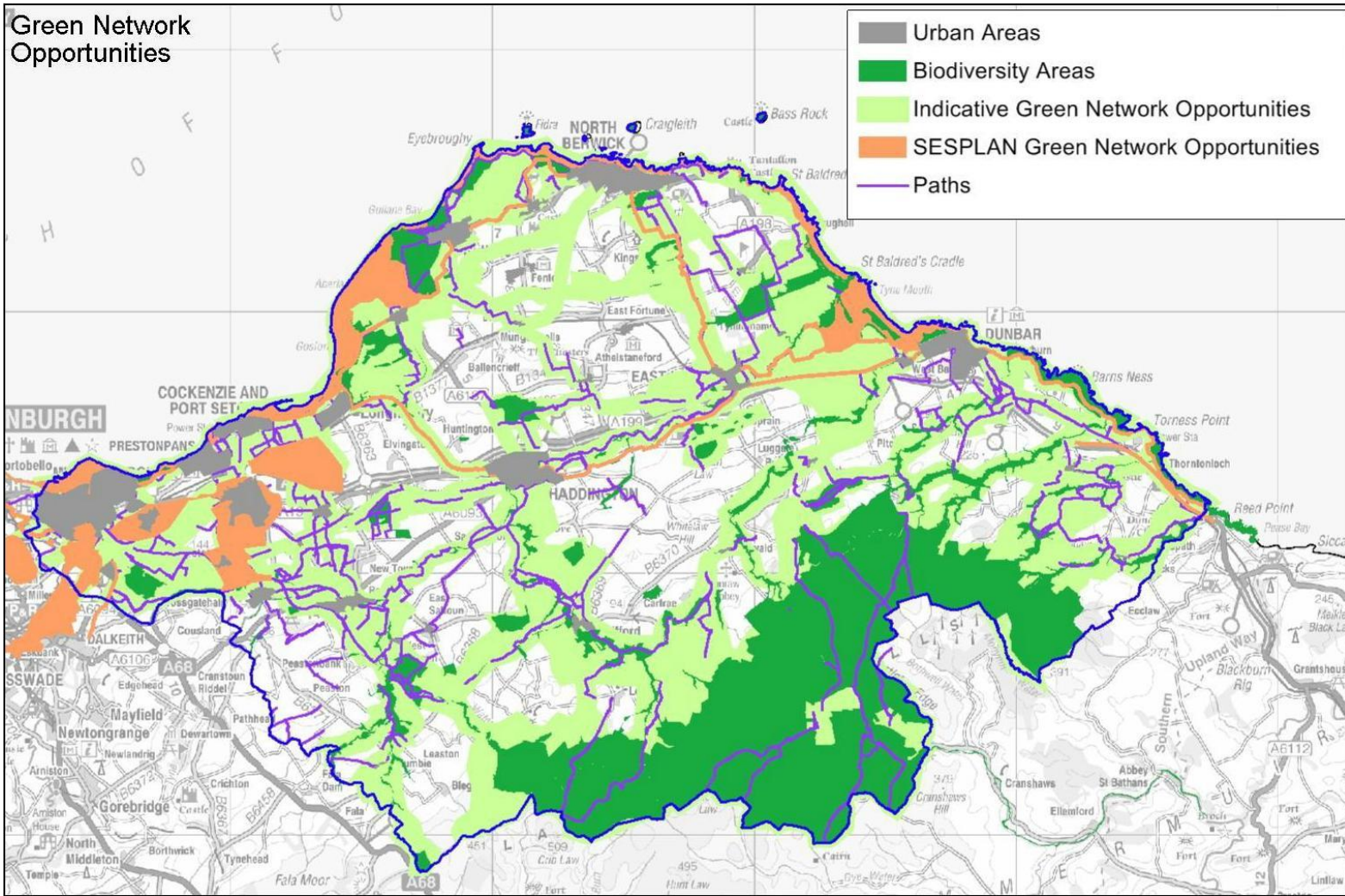


Table 11: Central Scotland Green Network

Preferred Approach	General strategy supported by Supplementary Guidance: Illustrate CSGN objectives on a general strategy plan for the LDP, such as that shown opposite. The LDP policies and proposals would provide protection to existing features that contribute to CSGN objectives in this strategy area and seek to make connections between them, including in the development of sites. Supplementary Guidance would be prepared to explain the CSGN strategy for the area in greater detail. It would highlight opportunities to integrate with other plans, policies and strategies, such as the Edinburgh & Lothians Forestry & Woodland Strategy, and set out a long term vision for the green network in East Lothian.
Reasonable Alternative	General strategy with no Supplementary Guidance: Illustrate CSGN objectives on a general strategy plan for the LDP, such as that shown opposite. The LDP policies and proposals would provide protection to existing features that contribute to CSGN objectives in this strategy area, and seek to make connections between them, including in the development of sites.

Question 9: Central Scotland Green Network

In terms of approach to the Central Scotland Green Network in East Lothian, do you support the preferred approach, the reasonable alternative, or neither? Please explain your answer. If you support neither of the above options, what alternatives do you suggest?

What do you think the priorities are for the green network for East Lothian or for your local area?

Development in the Countryside and on the Coast

Development in the Countryside

- 5.82** The SDP recognises the importance of the countryside to the area’s desirability as a place to live, work, do business and visit and in providing amenity. Yet the approach to the management of development in the countryside is not a matter covered by the policies of the SDP. However, it notes there is a need to reconcile the potentially competing demands for appropriate rural development and to maintain and enhance the character and appearance of East Lothian’s countryside. SPP provides the national policy on appropriate approaches to rural development in different areas.
- 5.83** SPP recognises that there are different types of rural area and a variety of development pressures on them. In particular, SPP notes that countryside areas accessible from cities and main towns, such as East Lothian, should be protected against unsustainable growth in car based commuting and the suburbanisation of the countryside³⁵. The LDP should respond to the specific circumstances of its rural area while supporting diversification and growth in the rural economy, including appropriate tourist related development and digital connectivity. Currently such development proposals in the countryside are assessed against criteria based policies of the local plan, including Policy DC1: Development in the Countryside and Undeveloped Coast. It is particularly supportive of proposals for the diversification of the rural economy, where they are of an appropriate scale and character and have an operational requirement for such a location.
- 5.84** Policy DC1 also supports new housing where justified as an operational requirement in association with agriculture, forestry or countryside recreation. It also supports the conversion and rehabilitation of redundant vernacular buildings in the countryside (of which many remain) to other appropriate uses including residential use, a policy approach that would be undermined were new housing to be permitted in the countryside instead of on sites in or allocated adjacent to existing settlements. In certain circumstances it also allows enabling housing development in the countryside to support appropriate uses. It is also in the countryside where certain infrastructure and renewable energy proposals come forward, including wind turbines. In addition, minerals can only be worked where they are found and East Lothian has deposits of sand and gravel, coal, hard rock and aggregates in its countryside. These types of proposal are assessed against criteria based policies, the review of which has raised no major issues.
- 5.85** In areas such as East Lothian, SPP suggests that a restrictive approach to new housing development in the countryside is appropriate. SPP notes that some types of housing development in rural areas, including the replacement of derelict houses and steadings, as well as new housing and the conversion and rehabilitation of buildings, may be appropriate if proper integration with the surroundings can be achieved. In exceptional

³⁵ Scottish Planning Policy paragraph 74 - 83

circumstances, affordable housing may be appropriate adjacent to existing settlements on land not allocated for this purpose³⁶. Where the modernisation and conversion of steadings is concerned, this need not be contained to the original building envelope unless for compelling design or conservation reasons. However, SPP is clear that the approach to development in the countryside in pressurised areas must not result in its suburbanisation or unsustainable car based commuting. For areas such as East Lothian, SPP confirms that most new housing development is to be in or adjacent to existing settlements. The loss of prime quality agricultural land is also to be minimised.

- 5.86** Policy DC1 supports appropriate rural diversification and business uses in the countryside including those associated with agriculture, horticulture, forestry and countryside recreation. New housing is also supported, albeit in limited and specific circumstances. New housing may be supported in the conversion of an existing farm steading if this would complete its original form, or is a logical extension to the existing steading and in keeping with its scale form and character, or if justified by an operational requirement in association with another business use supported in the countryside, or where residential development would enable an employment, tourism or leisure development or where this would provide funding to enable the restoration of a listed building or other feature of the built or natural environment the retention of which is desirable.
- 5.87** In some cases temporary residential accommodation may be approved until a business has established and it is demonstrated that the need for permanent accommodation in association with it is justified. In November 2011 the chief planner set out the Scottish Governments position on the use of occupancy conditions to restrict the occupancy of new dwellings in the countryside to people employed in a rural business. In areas such as East Lothian occupancy conditions have continued relevance, albeit that planning conditions are the preferred mechanism for securing this objective and some amendment to Policy DC1 is needed to reflect this change in practice.
- 5.88** In the specific circumstances of easy accessibility to the city and in the interests of maintaining the character of the countryside it is not appropriate to be permissive to new houses, or employment of an inappropriate scale or character, in the East Lothian countryside. SDP Policy 7 allows the LDP to make small scale allocations for housing development on greenfield land within and outwith the SDA. This confirms that a plan led-approach to the identification of greenfield sites for housing development in the countryside is normally expected. Windfall proposals for development of housing on greenfield land in those areas should normally be resisted. The Council's view is that the intentions of SPP and the SDP in this regard are reflected appropriately in the current policy approach set out in local plan Policy DC1, and that these policy principles should generally continue to be followed.
- 5.89** However, it may be that a more flexible approach to windfall housing proposals in the countryside could be considered in certain circumstances. This may have implications for Policy DC1 as it relates to those parts of the countryside within and outwith the SDA. For example, Policy DC1 may be made

³⁶ Scottish Planning Policy paragraph 130

more permissive to very small scale new build solely affordable housing development in the countryside, such as to allow some very limited infill new build affordable housing on previously developed land where it is located within or immediately adjacent to an existing group of housing in the countryside. Replacement dwellings may also be considered. However, the approach to the principle of such new build proposals within the green belt or within any designated Countryside Around Town area should continue to be one of resistance.

5.90 Policies managing development in the countryside need to acknowledge the wide range of development and activities that should and should not take place there. They must balance the competing demands for development by promoting and supporting appropriate development, whilst guarding against inappropriate development and helping direct it to more suitable locations. The character and appearance of the countryside is also to be maintained and enhanced.

Development on the Coast

5.91 In terms of development on the coast, SPP notes that development plans should identify coastal areas that are largely developed and that may be suitable for further development, areas subject to significant constraints, and areas considered unsuitable for development which are largely unspoiled and that are generally unsuitable for development. There should be a presumption against development on areas of unspoiled coast. Such unspoiled locations may include the Forth Islands and Bass Rock.

Table 12: Development in the Countryside and on the Coast

Preferred Approach	Maintain current policy approach to development in the countryside and define coastal areas with significant constraints and largely unspoiled: Generally maintain the current policy approach. However, the LDP proposals map should define significantly constrained coastal areas and those parts of the coast which are unspoiled. A presumption against development on the unspoiled coast would be introduced. A reference will be made to the need to minimise the loss of rare or carbon rich soils. Clarification that occupancy restrictions would normally dealt with by planning condition would also be introduced.
Reasonable Alternative	As the preferred approach, but in very limited circumstances be less restrictive to very small scale housing proposals in the countryside: Generally maintain the current policy approach, but review Policy DC1 to include the following exceptions: <ul style="list-style-type: none"> a. the like for like replacement of a dwelling recently rendered uninhabitable by unforeseeable circumstances, such as demonstrable accidental fire, may be permitted if there is compelling evidence that the loss of the original habitable

dwelling was recent and that it benefited from lawful use as a dwelling immediately prior to the loss;

- b. very small scale solely affordable housing proposals in the countryside may be permitted if they would be a logical addition to an existing small scale and more remote rural settlement of East Lothian identified by the LDP or group of existing dwellings in the countryside, if no alternative and more appropriate development opportunity exists within the settlement / area, such as the reuse or redevelopment of land and /or buildings. Limitations would be placed on the number and scale of dwellings that may be supported during the plan period relative to the scale of existing settlements and character of the local area.

Detailed policy criteria would be introduced either as a part of Policy DC1 or as new policy. However, the approach to the principle of new build proposals within the green belt or within any designated Countryside Around Town areas would be one of resistance.

Question 10: Development in the Countryside and on the Coast

In terms of the approach to managing development in the East Lothian countryside and on the coast, do you support the preferred approach, the reasonable alternative, or neither?

If you support the alternative approach do you think a) or b), or a) and b) should be incorporated in to policy?

If you support neither of the above options, what alternatives do you suggest?

Please explain your answer.

6 Implementation by Cluster Area

- 6.1 This section describes potential sites, at this stage, for implementing the preferred 'compact' spatial strategy to deliver future strategic development requirements in East Lothian through time. The preferred development sites are identified together with the likely enabling and supporting infrastructure requirements where known at this stage, together with estimates of reasonable lead-in and delivery timescales. Similarly, alternative sites under the alternative 'dispersed' spatial strategy are also highlighted.
- 6.2 The preferred and alternative sites set out in this MIR are based on the site submissions received during an early 'call for sites' exercise; however, some of the sites suggested to the Council also appear as Other Site Options. The Other Site Options are sites or locations which at this stage are not considered to be reasonable alternatives, or are locations / sites for which the Council has received no submission during the call for sites exercise but would nevertheless consult on as potential development locations.
- 6.3 The preferred 'compact' spatial strategy has its focus in the west of East Lothian: consequently, the analysis of potential development sites and environmental and infrastructure opportunities and constraints are described from west to east across the area. This analysis has been done by cluster area because certain infrastructure and services are delivered in East Lothian on this cluster / catchment basis.
- 6.4 Blindwells new settlement, being potentially a short, medium as well as long term development opportunity is discussed separately.
- 6.5 In summary, the preferred 'compact' spatial strategy approach is as follows:
- Focus where appropriate the search for new housing and economic development land on the main settlements within the west of the SDA, closest to the origin of demand adjacent to the city, and then consider those main settlements further east. Development land may also be identified at settlements outwith the SDA if required;
 - Promote a new town centre, or higher order town centre, at Blindwells, and retain existing town centres including at Musselburgh, Haddington, Dunbar and North Berwick, and promote local centres at Wallyford and Blindwells and potentially in other locations if appropriate. Protect other mixed use areas in the smaller settlements;

- Review the employment land supply and seek a mix of uses to enable delivery of employment land where possible and appropriate;
- Plan to meet housing requirements by a) firstly, complementing the existing strategy by intensifying or expanding existing allocations where possible and appropriate, b) identify appropriate new sites of different types and sizes to help meet requirements, c) define an area of search within which Blindwells may expand and d) safeguard appropriate land for potential longer term development opportunities;
- Release land from the green belt if this would a) allow development of effective sites that would be more suitable than those outwith the green belt b) lead to coalescence of settlements, **if** the accessibility advantages or the regeneration potential of the site in question outweigh those of other sites and the resultant loss of settlement identity and c) if new long term and defensible green belt boundaries can be defined;
- Introduce Countryside Around Town designations where the setting and identity of settlements or landscape features not in or adjacent to the green belt merit protection from built development;
- Provide protection to existing features that contribute to CSGN objectives, and seek to protect and further the extension of these features and, wherever possible, make connections between them, including in the development of sites;
- Within the countryside and on the coast, continue to support appropriate leisure, tourism and economic development opportunities of an appropriate scale and character (including energy and infrastructure related developments where appropriate) while restricting new housing development to very specific circumstances with a particular focus on the reuse of appropriate existing traditional buildings.

6.6 The following section discusses for each cluster area the environmental opportunities and constraints, the preferred development sites and their reasonable alternatives and the potential infrastructure and other mitigation requirements where known at this stage. **Those parties promoting potential development sites must prove the effectiveness of their sites in discussion with the Council and to its satisfaction before any site may be included in the Proposed LDP. In addition, the Proposed LDP must take in to account the resources available to implement the plan as well as an analysis of environmental and infrastructure opportunities and constraints. As such the consultation responses to the MIR will be key to concluding this assessment and thus how and where new development may be accommodated in the area.**

EXISTING CLUSTER AREAS

The Musselburgh Cluster

6.7 All the settlements within Musselburgh Grammar's catchment area fall within the East Lothian Strategic Development Area and, in particular, its western part. Consequently, in terms of the preferred strategy, at this stage this area may be considered as a focus in the search for additional strategic land allocations to contribute to the SDP's development requirements.

Green Belt

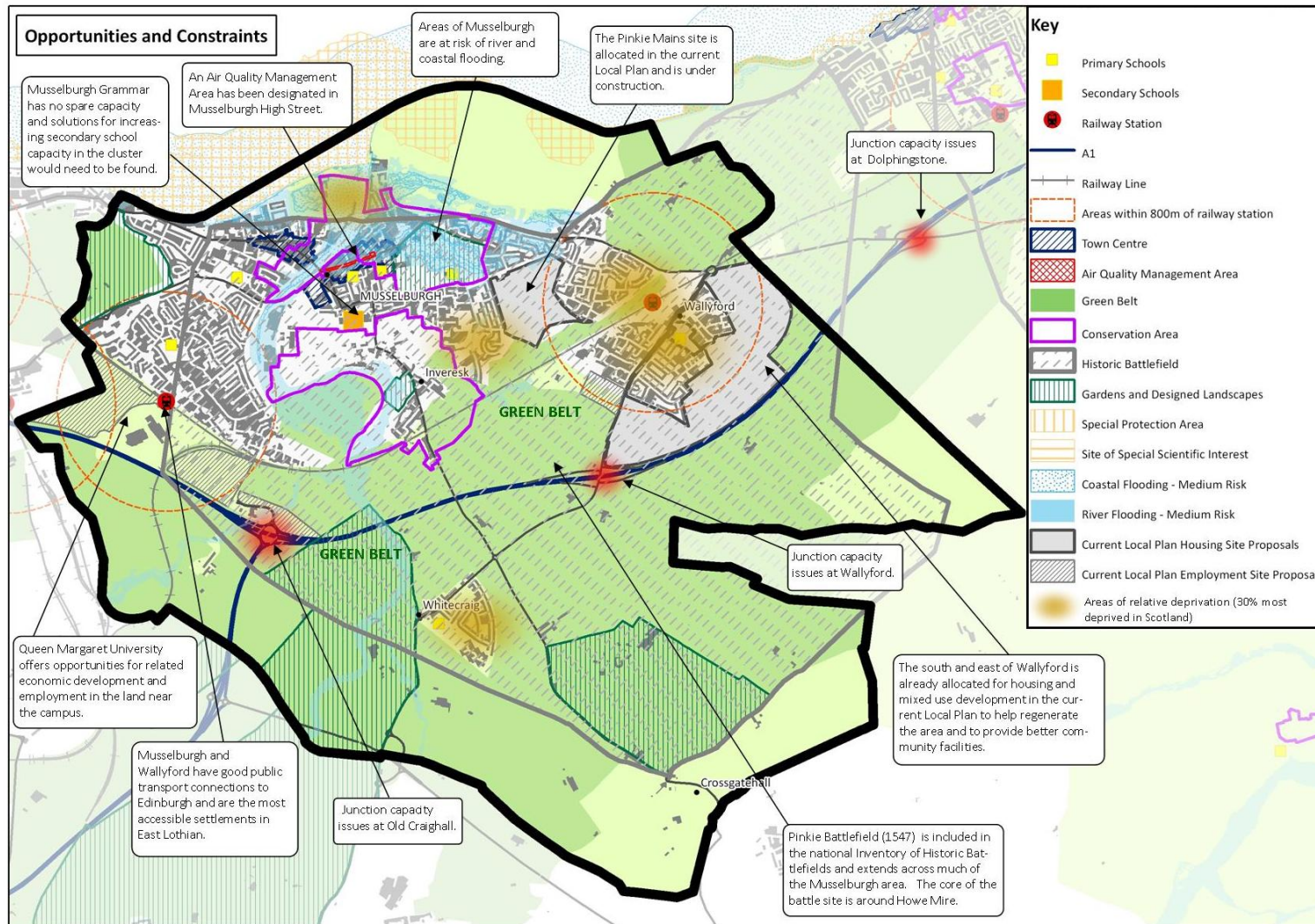
6.8 Any significant development land releases in this area will require changes to the green belt boundaries here. Considerations relevant to releasing land from the green belt are where it makes a lesser contribution to green belt objectives and/or where it is accessible by a variety of transport modes, particularly public transport, and / or if by directing development to such locations regeneration opportunities will be realised. However, settlement coalescence and the resultant loss of community identity are also important issues that require careful consideration in this area.

6.9 Those locations within the green belt which make a lesser contribution to green belt objectives³⁷, or which have a high degree of accessibility, or that provide potential regeneration opportunities are:

- the land bounded by Newcraighall, Millerhill, the A720 City Bypass and the Old Craighall Junction;
- land to the east of Wallyford, at Goshen and at Levenhall;
- land south of Whitecraig.

6.10 The remaining areas of green belt, which should be vigorously defended, include the land to the east of the A720 and south of the A1 and land to the north of the A1, including that which provides for the setting of the well-defined, established and visible southern edges of Musselburgh and Inveresk. In addition, land around Edenhall and east towards Pinkie Braes provides a setting for and separation between the latter and Wallyford as well as views to prominent regional landmarks. Land to the west of Wallyford also contributes to the setting of settlements in this area and also forms the core of the Battle of Pinkie site. Notwithstanding the other merits of the land at Goshen set out above, the land between Musselburgh and Prestonpans contributes to retaining a setting and separation between these settlements.

³⁷ Edinburgh Green Belt Study 2008, Land Use Consultants for City of Edinburgh, East Lothian, Midlothian, West Lothian and Scottish Borders Councils and Scottish Natural Heritage



Preferred Economic Development Opportunities (subject to infrastructure provision and mitigation)

6.11 The preferred strategy supports the retention of existing operational employment areas as well as the employment allocations of the current local plan. Notwithstanding this, the following new employment opportunities are preferred at this stage:

- New business land (5ha) could be promoted to the south west of Old Craighall junction between the A720 and Old Craighall Road (**PREF-M2**);
- Land at Craighall, including existing employment allocations either side of QMU, could be promoted as part of a wider mixed-use development comprising land for economic development and housing (**PREF – M1**). The aim of this would be to enable the servicing / development of land allocated for employment using new housing to enable this, while providing homes nearby employment opportunities in an accessible location:
 - The Council considers that the existing 24ha allocated employment land between the QMU campus and Newcraighall should continue to be allocated for economic development or a mixed use, education and business-led hub. This would be to allow the adjacent university scope for expansion and to support the continued growth of the life sciences sector in this part of the city region. It would also service land for employment in an accessible location directly adjacent to a rail halt, the A1 and the intended terminus for Tram Line3;
 - The remaining 15ha of allocated employment land south east of QMU between the freight rail line and the B6415 road to Old Craighall remains appropriate for employment use; however, as part of any wider mixed use proposal a residential development of circa 350 homes on this land may be supported if education capacity solutions can be found and noise (particularly from the elevated A1 Musselburgh Bypass and freight line) can be addressed in a way that does not require sub-optimal mitigation solutions, such as acoustic barriers along the A1 which restrict/eliminate open views to Musselburgh and Inveresk and to other landmarks on the approach to Edinburgh;
 - The 21ha of land on the north west side of Old Craighall between the village and the freight line/A1 is currently in the Edinburgh Green Belt. Yet as part of a wider mixed use proposal in the area, this land may accommodate circa 350 homes, subject to education solutions being found and resolution of the same noise mitigation issues highlighted above;
 - The 55 ha of land between Millerhill, the freight rail line and A1 is also currently within the Edinburgh Green Belt. Yet as part of a wider mixed use development the Council would support the allocation of this land for economic development to replace that lost to housing to the north east;
 - Any housing allocations of this scale in this location would require education capacity solutions to be found.

This approach would require modification of green belt boundaries and recognises that this is also proposed by adjoining local authorities to accommodate strategic development. A new defensible and long term green belt boundary could be defined using the A720. A masterplan for the Craighall area would be required to demonstrate how development here would integrate with the surrounding area /developments.

Preferred Housing Opportunities (subject to infrastructure provision and mitigation)

6.12 The strategy continues to support the delivery of the existing housing land allocations of the current local plan including smaller scale housing commitments that form part of the established housing land supply. The sites in the table below are currently the preferred new housing opportunities in the Musselburgh Cluster. However, as mentioned above (paragraph 6.11) there are also a number of strategic developments proposed in adjoining local authority areas. There is some concern that the scale of the overall land release in the wider area would prevent all of the land being developed in the required timeframe, and that this may undermine the willingness / ability to deliver certain sites in East Lothian and / or elsewhere. Nonetheless, based on the compact spatial strategy and an analysis of opportunities the sites below are preferred at this stage.

Site Ref	2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
Existing Supply	1,056	794	0	1850	1,850	
Expand Existing Sites						
PREF – M7	Pinkie Mains	127	0	0	127	Land for circa 127 homes is within the existing Pinkie Mains allocation
PREF – M13	Wallyford	0	60	290	350	Land for circa 350 homes is within the existing Wallyford allocation
New Allocations						
PREF-M1	Craighall	125	375	200	700	Land at Craighall is a preferred land release. A mixed use proposal could be promoted here to provide a comprehensive solution for the development of 700, potentially more, homes and up to 79 ha employment land, subject to the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. The location is accessible and well served by public transport and there are opportunities that could improve this for the area. In regional terms, the location is one of the most accessible in East Lothian and its development would promote sustainable travel patterns and help minimise carbon emissions. The existing 24ha employment land on QMU's north-western edge should be retained for employment / institutional use and serviced using housing development on other sites at Craighall as an enabler for this. The 55ha of land which is crossed by overhead power lines to the east of the Millerhill Marshalling

Table 13: Musselburgh Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref	2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
						<p>Yards and between the freight rail loop and A1 could be removed from the green belt and allocated for employment, with access taken from the A1 via a new junction with QMU. The land to the east of QMU and north of the A1 may be allocated for housing instead of employment; land to the south of the A1 at Old Craighall could be removed from the green belt and may be allocated for housing. Access to both of these potential housing sites should be possible from the local road network. Any housing development at Craighall should enable the servicing of employment land to the north-west of QMU as described above. However, currently there is insufficient education capacity for a housing proposal of this scale in the area. School catchment reviews could be considered to establish if a new primary school may be promoted to serve a new development here; the provision of secondary school capacity and any need for school catchment review would be subject to any secondary education solution for the Musselburgh cluster. Another potential approach may be to promote catchment reviews for the Craighall area in association with land at and around Shawfair in the Midlothian Council area. However, new secondary education facilities there may not be delivered in the short or medium term. This would delay the ability to develop housing at Craighall until the longer term when new education facilities may be delivered at Shawfair and associated catchment reviews could be concluded. This timescale may be reduced if new primary and secondary school facilities were provided earlier at Craighall, which may also serve the Shawfair area. Any development here would be subject to transport impacts and appropriate mitigation, with new links provided as appropriate. Noise impacts would require mitigation in a manner acceptable in landscape terms. Significant structural landscape planting to contribute to green network objectives as well as provision of a foot path and cycle path network to connect with the surroundings and between the sites would be required. A comprehensive masterplan would be necessary, including consideration of how development of this land could help enable other sites</p>

Table 13: Musselburgh Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
							in the area which may come forward, potentially including those in the Midlothian Council area. For the avoidance of doubt this would include consideration of how this site may help make education capacity available to serve a wider area at primary as well as secondary level.
PREF-M9	Goshen	125	375	500	1000		Land at Goshen is a preferred land release, subject to the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. It could be promoted for a mixed use development including approximately 1,000 homes. It could help support community regeneration. This would be subject to education capacity being made available including the provision of a new primary school at the site and the ability to provide secondary school capacity. To provide any new primary school at the site school catchment reviews would be required. Provision of secondary school capacity would be subject to any secondary education solution for the Musselburgh cluster and school catchment reviews may be required. Importantly, the Goshen site may offer a potential site for a new secondary school facility to serve the Musselburgh area. Another approach may be to promote school catchment reviews and to direct secondary pupils from the site (and potentially a wider area) to Preston Lodge High School with feeder primary school arrangements also modified accordingly – e.g. any new primary school at Goshen feeding Preston Lodge High School. In regional terms, the site is one of the most accessible in East Lothian, and its development would promote sustainable travel patterns and help minimise carbon emissions as well as help contribute to regeneration objectives. Access may be provided via the local road network, but as with other sites in the area cumulative impacts must be assessed and mitigation provided, including in relation to any air quality impacts. There would be impacts from the removal of the site from the green belt in terms of coalescence of settlements and settlement identity and setting, but these could in part be mitigated by structural planting as part of the Central Scotland Green Network and the selective positioning of open space within

Table 13: Musselburgh Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
							the site. A comprehensive masterplan for the Goshen area would be required, including how any development here could be integrated with the surrounding area and consideration of how this land could help enable any other sites in the surrounding area which may come forward. For the avoidance of doubt this would include consideration of how this site may help make education capacity available to serve a wider area at primary as well as secondary level.
PREF-M8	Levenhall	75	0	0	75		Land at Levenhall is a preferred land release, subject to the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. It could be promoted for circa 75 houses subject to the ability to provide education capacity and site access to the A199. It may be that education capacity could only be made available for this site in association with any primary education solution brought forward at Goshen and provision of secondary school capacity would be subject to any secondary education solution for the Musselburgh cluster. A masterplan would be required.
PREF-M6	Edenhall (site assessment required)	100	0	0	100		NHS operations have now ceased at the former Edenhall Hospital site and it is brownfield land. As the site is now surplus to NHS requirements it could be promoted for approx 100 houses, subject to the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate as well as the ability to make education capacity available. Site access from local road network should be possible. It may be that education capacity could only be made available for this site in association with any primary school catchment review associated with any education solution brought forward at Goshen. The provision of secondary school capacity would be subject to any secondary education solution for the Musselburgh cluster. A masterplan would be required.
PREF-M10	Drummohr (Safeguard circa 100 Homes)	0	0	0	0		Drummohr Caravan Park is a preferred land safeguard. While the site is currently separate from Musselburgh and within the green belt, it would represent a logical extension to development at Goshen in the medium term

Table 13: Musselburgh Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
							if that site came forward. The site at Drummohr could be a location for approx 100 homes, subject to the mitigation of any development related impacts including education, transportation and any air quality impacts on a cumulative basis as appropriate. It may be that primary education capacity could only be made available for this site in association with any education solution brought forward at Goshen. Provision of secondary school capacity would be subject to any secondary education solution for the Musselburgh cluster. The site is currently in use as a caravan park and there is no short term intention to cease this operation so the land could be safeguarded for a potential housing development. A masterplan would be required.
PREF-M11	Dolphingstone (Safeguard circa 400 Homes)	0	0	0	0		Land at Dolphingstone is a preferred land safeguard, subject to the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. There may be an opportunity for Wallyford to expand further east beyond the area of the current allocation towards the Dolphingstone interchange, into land which is currently in the green belt. This land would have capacity for approximately 400 homes and other mixed land uses. An appropriate education solution for this area would be required. Most of the land is currently within Tranent's Sanderson's Wynd Primary School catchment area, but any future catchment review may include it within the catchment of the new Wallyford Primary School once the new school is in place. The provision of secondary school capacity would be subject to any secondary education solution for the Musselburgh cluster. The preference is that this land only be considered for development once the new primary school at Wallyford has been delivered and the land designated by the current local plan allocation is substantially built out with new distributor road through the site linking Salter's Road with the A199 complete as a minimum.
PREF-M3(a)	Old Craighall East	50	0	0	50		Land at Old Craighall East is a preferred land release, subject to the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. Site access from local

Table 13: Musselburgh Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
							road network should be possible. In combination with Newton Farm (see PREF – M3b below) these sites could provide approximately 100 homes on the south side of Old Craighall Road, subject to education solutions for the wider area. A shared primary education solution for the wider area may be required, including the means of providing education capacity for this site with the other preferred sites at Craighall. This should be reflected in any comprehensive masterplan prepared for the other Craighall sites as appropriate. The provision of secondary school capacity would be subject to any secondary education solution for the Musselburgh cluster. There are significant cultural heritage assets to the south west of this land, including a scheduled monument, a listed building and a designed landscape. However, it may be that some land to the north east, beyond the category A-listed Monkton House and its setting, could be developed without harming cultural heritage assets. Any noise impacts from the adjacent roads would require mitigation in a manner acceptable in landscape terms. Significant landscape planting to contribute to Central Scotland Green Network objectives would be required. A co-ordinated joint masterplan would be required showing how this site would be integrated with its surroundings and the site PREF – M3b.
PREF-M3(b)	Newton Farm, (also Old Craighall East)	0	50	0	50		See PREF – M3(a) above (Old Craighall East).
PREF-M4	Whitecraig South	75	225	0	300		Land at Whitecraig South is a preferred land release, subject to the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. It could be promoted for approximately 300 homes and other mixed land uses, subject to education capacity. Land to the south of the village is well-located to its primary school and offers scope to expand this facility (to accommodate any new housing development) and the adjacent open space. The provision of secondary school capacity would be subject to any secondary education solution for the Musselburgh cluster. Access from the local road network and

Table 13: Musselburgh Cluster - Existing Housing Supply & Preferred New Housing Opportunities

Site Ref		2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
							to the A68 or A1 may be achieved. A road link through the site to Whitecraig Avenue would also be required. New development here offers regeneration potential. New defensible green belt boundaries could be formed to the south west, whereas this would be difficult to the north of the settlement. A masterplan would be required.
PREF-M12	Barbachlaw	94	0	0	94		The 94 house planning consent at Barbachlaw, Wallyford should be reflected as a new housing land allocation to reflect a planning appeal decision. For the avoidance of doubt the completion of the stadium proposal continues to be supported.
	<i>Sub Total</i>	<i>771</i>	<i>1085</i>	<i>990</i>	<i>2846</i>	<i>2,846</i>	
	Totals	1,827	1,879	990	4,696	4,696	

Reasonable Alternative Sites & Other Site Options

6.13 At this stage the following sites may be reasonable alternative development opportunities or other site options.

Table 14: Musselburgh Cluster - Reasonable Alternative Sites & Other Site Options

Site Ref	Site Name	Comments
ALT-M5	Whitecraig North	This site to the north-west of Whitecraig may be a reasonable alternative development opportunity, subject to education capacity and the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. However, this site is exposed in landscape terms and would not represent as logical an expansion of the settlement as the preferred site to the south. Securing appropriate green belt boundaries would also be challenging. Access may be provided to the local road network.
OTH-M14	Howe Mire	Land at Howe Mire, to the west of Wallyford, may be considered as another option for a mixed use housing and employment development, subject to education capacity and the mitigation of any development related impacts including transportation and any air quality impacts on a cumulative basis as appropriate. For the avoidance of doubt the completion of the stadium proposal continues to be supported. However, in relation to the land further west, it is in the core of the Pinkie battlefield site and thus would have more significant landscape and cultural heritage impacts than other sites. Additional primary school capacity would be required, and this could not be provided until a new primary school at Wallyford is delivered in the existing expansion area. Provision of access would also need to be resolved.

Infrastructure

Secondary education

- 6.14 Committed housing sites such as Pinkie Mains and Wallyford require an increase in secondary school capacity at Musselburgh Grammar beyond its current 1,350 pupil places. Any further significant housing development in the Musselburgh Grammar catchment area would require a substantial increase in secondary education capacity beyond that needed to accommodate the pupils currently anticipated from these committed sites.
- 6.15 Further on-site expansion at Musselburgh Grammar to accommodate pupils from committed housing sites is technically possible but this would bring significant challenges to achieving educational outcomes. Another approach to increasing secondary school capacity at Musselburgh Grammar beyond 1,350 pupils may be to split the school over two campuses to create a new purpose built Annex facility. An appropriate site for any Annex would need to be found. One site option in close proximity to the existing Musselburgh Grammar School campus is Council owned land at the former Brunton Wireworks site. However, this site would secure no more additional capacity than could be provided by expansion of the school on its existing site, and would present even greater challenges to achieving educational outcomes. Notwithstanding this, neither of the above options for the expansion of Musselburgh Grammar could provide sufficient secondary education capacity for the preferred strategy. Further options for making additional secondary education capacity available in the Musselburgh Cluster in support of all or some of the preferred sites in a manner that may help lead to improved educational outcomes may be:
- a. a new secondary school on a new campus to replace the existing Musselburgh Grammar school and which would serve all the Musselburgh cluster, including committed and preferred housing sites; or
 - b. a new upper secondary school facility that would provide purpose built accommodation for senior phase pupils on a new campus discrete from the existing Musselburgh Grammar campus while maintaining a single secondary school for the cluster; or
 - c. a second and entirely new secondary school in addition to the existing Musselburgh Grammar to serve part of the existing Musselburgh cluster;

In the case of a), b) and c), a suitable site for a new secondary school facility would need to be found and funding and delivery solutions would need to be confirmed and agreed before any of these options could be considered as part of any Proposed LDP strategy. Importantly, funding for any new facility would need to be secured from sources other than East Lothian Council. Developer contributions would have a significant role to play, and funding solutions are also being explored with the Scottish Government. **However, unless funding and delivery solutions are found, these are unlikely to be options given the resources available to implement the plan.** Any such solution would need to ensure early provision of a new secondary school facility to enable development of all sites in the cluster independently of one another. This would require an appropriate

mechanism to be identified (likely not a planning obligation) that would initially allow an appropriate and sufficient site to be transferred to the Council with the option to secure additional land in phases. Developer contributions would be sought towards campus land through time. If a new second secondary school were to be provided, school catchment reviews would be required and a location for it in the east of the cluster would be preferred. This would ensure suitable feeder primary school arrangements and complement regeneration objectives. The Council currently has no appropriate land in its control; or

- d. A further option could be to redefine cluster boundaries in west Musselburgh in association with a joint arrangement with Midlothian and/or City of Edinburgh Councils:

At this stage the City of Edinburgh Council has indicated that there is no scope for such a cross boundary arrangement. However, Midlothian Council has indicated that scope may exist for such a shared education solution in association with development at and around Shawfair. This approach would require school catchment reviews in both local authority areas. The timing for development at and around Shawfair and the provision of new education capacity, particularly secondary education capacity, would influence the timing for any development that may occur in west Musselburgh should it be dependent on education capacity being provided at Shawfair. At this stage a new secondary facility at Shawfair is not expected to be delivered until 2023 at the earliest; or

- e. A final option could be to redefine cluster boundaries in east Musselburgh to displace demand for education capacity to Preston Lodge High School:

Preston Lodge High School could accommodate additional secondary pupils from the Musselburgh Cluster, but this is a sub-optimal solution and is not preferred. It would require school catchment reviews. This solution would also have an impact on if / how education capacity may be provided for other sites in / around the current Preston Lodge catchment, including for Blindwells.

Primary education

- 6.16 There is limited available primary school capacity in the Musselburgh cluster. In the west of Musselburgh, there may be scope to make use of the very limited available education capacity at existing primary schools, potentially involving catchment reviews. Subject to secondary education solutions, this may allow a limited number of new homes at Craighall to come forward in the short term; however, if such potential exists it must be part of a wider comprehensive solution for the development of the entire area before it could be followed. The solution would need to ensure new housing and associated infrastructure, including new education facilities, would be brought forward and that it would enable the servicing of employment

land adjacent to the university.

- 6.17 Any medium / longer term comprehensive solution for Craighall would need to deliver and sustain a new primary school facility, likely requiring a minimum of circa 700 new homes, and primary school catchment review(s). The land surrounded by the freight rail line, the A1 and crossed by overhead pylons is not as well connected to its surroundings via roads and pedestrian and cycle routes as would be expected for a residential area and for education facilities, but would be suitable for employment use if direct access to the A1 were to be provided.
- 6.18 In east Musselburgh, Pinkie St Peter's Primary School is programmed to be expanded to accommodate the committed housing sites in its catchment, but may not be able to expand further beyond this to accommodate the preferred sites currently in its catchment area. However, there may be opportunities in association with a new primary school at Goshen to redefine catchment boundaries here and to make additional capacity available at Pinkie St Peter's Primary School to allow preferred sites to come forward.
- 6.19 The existing Wallyford Primary School has no available capacity; however, a new primary school is to be provided in association with the committed expansion of that settlement. The new Wallyford Primary School would require to be made capable of further expansion to accommodate the additional pupil places required in association with the increased housing numbers that may be directed to that site under the preferred strategy. Whitecraig Primary School could be expanded as part of the preferred approach to the expansion of that settlement.
- 6.20 **Any new housing land allocations in the Musselburgh cluster will be resisted unless solutions are found that will fund and deliver the necessary additional education capacity needed to support them in a manner acceptable to the Council. This will require innovative approaches to securing developer funding for the provision of increased education capacity and new education facilities.**

Transportation

- 6.21 Any significant new development in East Lothian that feeds traffic onto the A1 will impact upon the capacity of the road and its junctions. There are particular issues with the capacity of the Old Craighall Junction, particularly the length of slip lane queues, as well as all junctions west of Gladsmuir. This will be particularly so once the committed and additional development required in East Lothian is delivered. Transport Scotland is seeking a developer contribution mechanism to be put in place to provide the required funding to deliver its increased capacity.

6.22 The existing non-trunk road junction providing access to the QMU campus and adjacent employment land may be modified to provide on and off ramps in both directions in order to accommodate additional development in the area. This may also help to relieve some capacity issues at Old Craighall Junction in the short term. Mitigation is committed at the Wallyford A 1(T) and Dolphingstone A1 (T) interchanges in association with the Wallyford strategic allocation, but further work may be required to those interchanges to accommodate additional development in the area. The resultant increase in vehicle flows may also impact on noise mitigation requirements.

6.23 There are also concerns about the capacity of Musselburgh Town Centre to accommodate additional traffic beyond current commitments and the potential cumulative impact of additional development on this situation. However, it may be that if solutions are brought forward at Old Craighall that this may help redirect traffic from Musselburgh High Street. The existing air quality in Musselburgh town centre is a related concern and ELC Transportation is considering how the existing situation could be managed in association with an emerging development strategy. Any development will be subject to transport and associated air quality impacts and appropriate mitigation, based on an assessment of cumulative impact.

Water and Drainage

6.24 The implications of the preferred sites on this area can be accommodated by Scottish Water. It has indicated that capacity exists in its strategic assets to accommodate the preferred sites in the short term. It may be that investment is required in to the medium / longer term to accommodate the cumulative impact of these sites together with those in other local authority areas. Water and drainage impact assessments will be required to establish solutions in to the medium and longer term for strategic assets and for how connections to the local networks will be secured.

Mitigation

6.25 Mitigation requirements will include:

1. Establishing new, long term defensible green belt boundaries;
2. Delivery of the green network opportunities, including woodland planting, active travel routes and habitat networks;
3. Noise impacts and the visual impacts of mitigation requirements arising from increased vehicle flows, the rail network and noise from adjoining land uses will need to be taken into account;
4. Trunk and local road impacts, including at Old Craighall, arising as a result of the cumulative impact of development including that within East Lothian;

5. Traffic and parking management measures are being considered for Musselburgh town centre to ease vehicle flows and to assist in meeting air quality management objectives;
6. Detailed modelling of traffic and air quality impacts to establish if the preferred strategy can be supported in the Proposed LDP, including consideration of cumulative impacts;
7. Education capacity constraints would need to be overcome;
8. In to the medium / longer term additional strategic foul drainage capacity may be required;
9. Identification of any ground conditions constraints and methods of mitigation;
10. Comprehensive masterplans would be required.

Those parties promoting development sites in this area must work together and with the Council to demonstrate to its satisfaction that the above issues can be satisfactorily addressed and associated mitigation delivered so sites are / can be made effective before they may be included in a Proposed LDP. It is expected that developer contributions will have a significant role to play in securing mitigation as appropriate.

Other Proposals

- 6.26** Lagoon 6 at Levenhall is in the process of restoration and lagoon 8 has an agreed restoration plan and is also part of the SPA. As part of this restoration there may be opportunities to create conditions suitable for a higher quality wildlife habitat and the creation of a local nature reserve. The LDP should support such use and designation of this area should appropriate restoration proposals be completed. The plan at Appendix 4 illustrates the potential boundaries for such a designation.

Key Messages: Musselburgh Cluster

At this stage the preferred development opportunities in the Musselburgh cluster could deliver approximately **4,700 additional homes and 84 ha of additional employment land** over the period to 2024 and beyond. However, the cumulative impact of development on transportation, air quality and education provision are critical issues. These will be important factors in determining the scale and distribution of any additional development in the area. The cumulative impact of additional development on the transport network, including at Old Craighall, is an issue that requires to be resolved. Notwithstanding this, in regional terms the Musselburgh cluster is highly accessible, including by public transport. It is in high demand as a place to live and offers significant potential for job creation. Strategic water and drainage capacity is available to serve this scale of additional development. There are also regeneration opportunities in the cluster. Importantly, there is a significant opportunity to promote a scale of growth in the cluster, and to share this among its settlements, which would justify the provision of new primary school as well as new secondary school facilities. However, whilst there may be a range of options to increase education capacity here, deliverable solutions for the funding and delivery of additional education capacity, potentially including a need for additional campus land, when it would be required, will be essential to enable any further housing development in this area. **Clarity on funding and delivery mechanisms is essential to establish how much additional education capacity, if any, may be provided, what form this may take and, consequently, how much additional housing land, if any, may be supported in this cluster and where. Any new housing land allocations in the Musselburgh cluster will be resisted unless solutions are found that will fund and deliver the necessary additional education capacity needed to support them in a manner acceptable to the Council. This will require innovative approaches to securing developer funding for the provision of increased education capacity and new education facilities.** There would also be a need to consider the redefinition of school catchment boundaries in association with the provision of any new primary education facilities as well as potentially a need for the same and consideration of feeder primary school arrangements in relation to any new second secondary school in the area, or for any joint arrangement between adjoining local authorities, or in the review of cluster boundaries within East Lothian. Comprehensive masterplans would be required for developments in the area. Before committing to significant additional housing allocations that may increase traffic in Musselburgh town centre there must be a clear solution to mitigate cumulative impacts both in terms of through traffic and air quality. Intervention at Old Craighall Junction to avoid through traffic routing through the town may assist this. As a minimum micro simulation modelling will be required to help resolve this issue, and to test potential solutions. Proposals will be developed to address these issues, and developer contributions towards delivering these solutions are very likely to be required. **If none of the additional growth preferred for the Musselburgh cluster can be supported, or if only a proportion of it can, alternative land and infrastructure solutions will need to be found so it can be delivered further east in East Lothian.**

Question 11: Musselburgh Cluster

Do you support the preferred approach to new economic development and housing opportunities in the Musselburgh cluster?

Taking in to account the prospect of other strategic development opportunities in adjoining local authority areas, do you think that all of the preferred housing sites in this cluster could be delivered in the anticipated timeframe? Please explain your answer.

Potential options have been identified for how education capacity might be increased in the cluster. How do you think those options could be funded and delivered?

Where might any new education facilities be located if required?

Please indicate if you support or oppose particular preferred sites, reasonable alternative sites, or other site options, and explain why?

If you do not support the preferred sites, please indicate what alternative sites you would suggest?

Do you have any other comments on the Musselburgh cluster area?

The Prestonpans/Port Seton/Cockenzie/Longniddry Cluster

6.27 All the settlements in Preston Lodge High School's catchment area fall within the East Lothian Strategic Development Area (SDA) and, in particular, its western part. Consequently, at this stage this area may be considered as an area of search for additional strategic land allocations to contribute to SESplan's requirements.

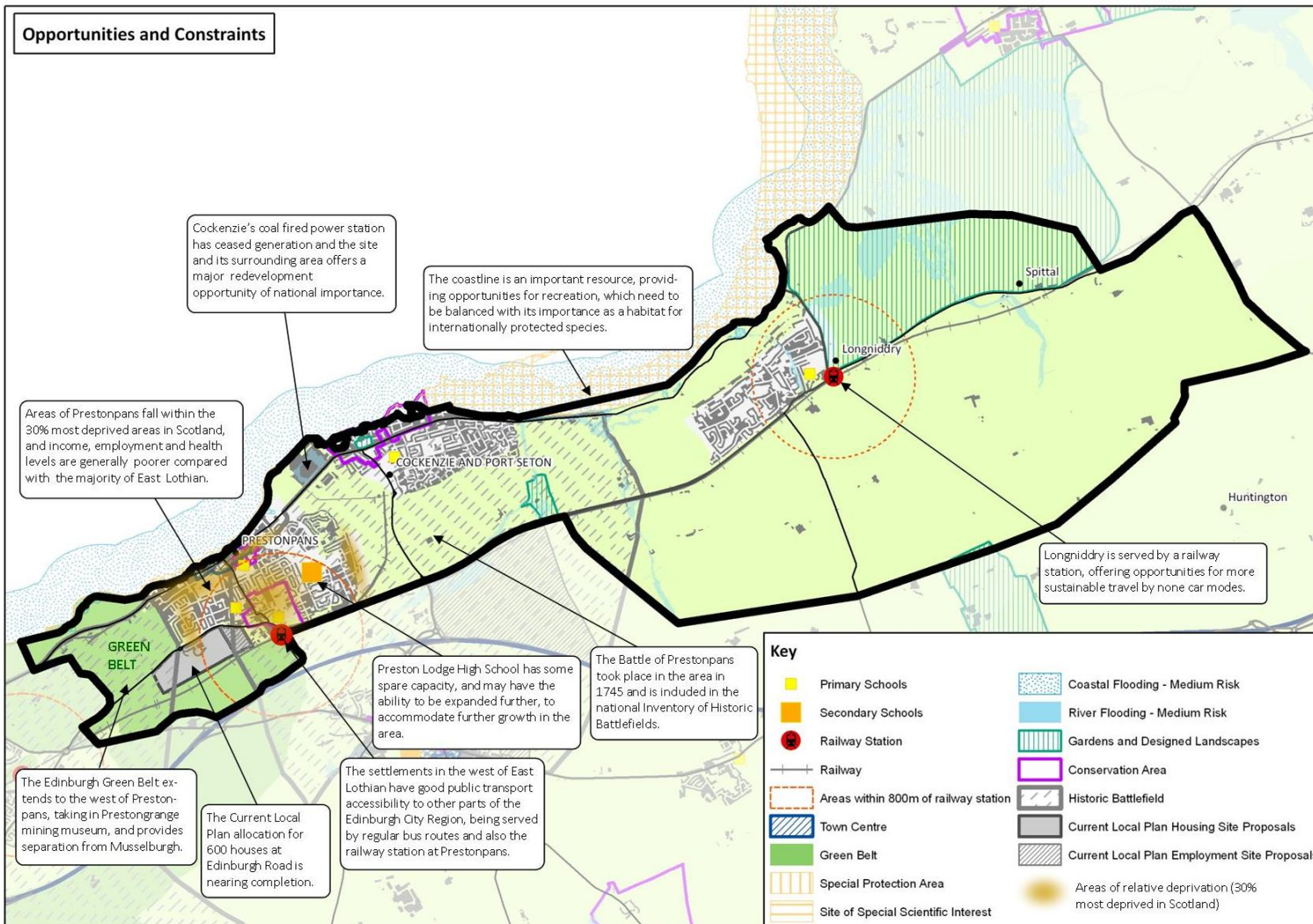
Green Belt & Countryside Around Towns

6.28 The green belt extends to the west and south of Prestonpans, between it and Musselburgh and to the crest of the Tranent Ridge and to Bankton House and Johnnie Cope's Road. The areas of green belt land within this cluster around Prestonpans are important in maintaining green belt objectives and should be vigorously defended.

6.29 There are also areas of land in this cluster that are outwith the green belt and which are under development pressure. These are between Prestonpans, Cockenzie, and the allocated land at Blindwells and Tranent. These locations should not be preferred or alternative development opportunities because they would lead to the coalescence of settlements, undermine the character of settlements, compromise cultural heritage assets and / or lead to the loss of the best quality prime agricultural land.

6.30 The combination of these environmental constraints and the desire to retain the separate identity of settlements and their character and setting points to a need to restrain further built development here which, individually or cumulatively, would undermine these objectives. To help retain the separate identity of these settlements the extension of the green belt, or another policy approach such as a Countryside Around Town designation, is being considered in certain locations.

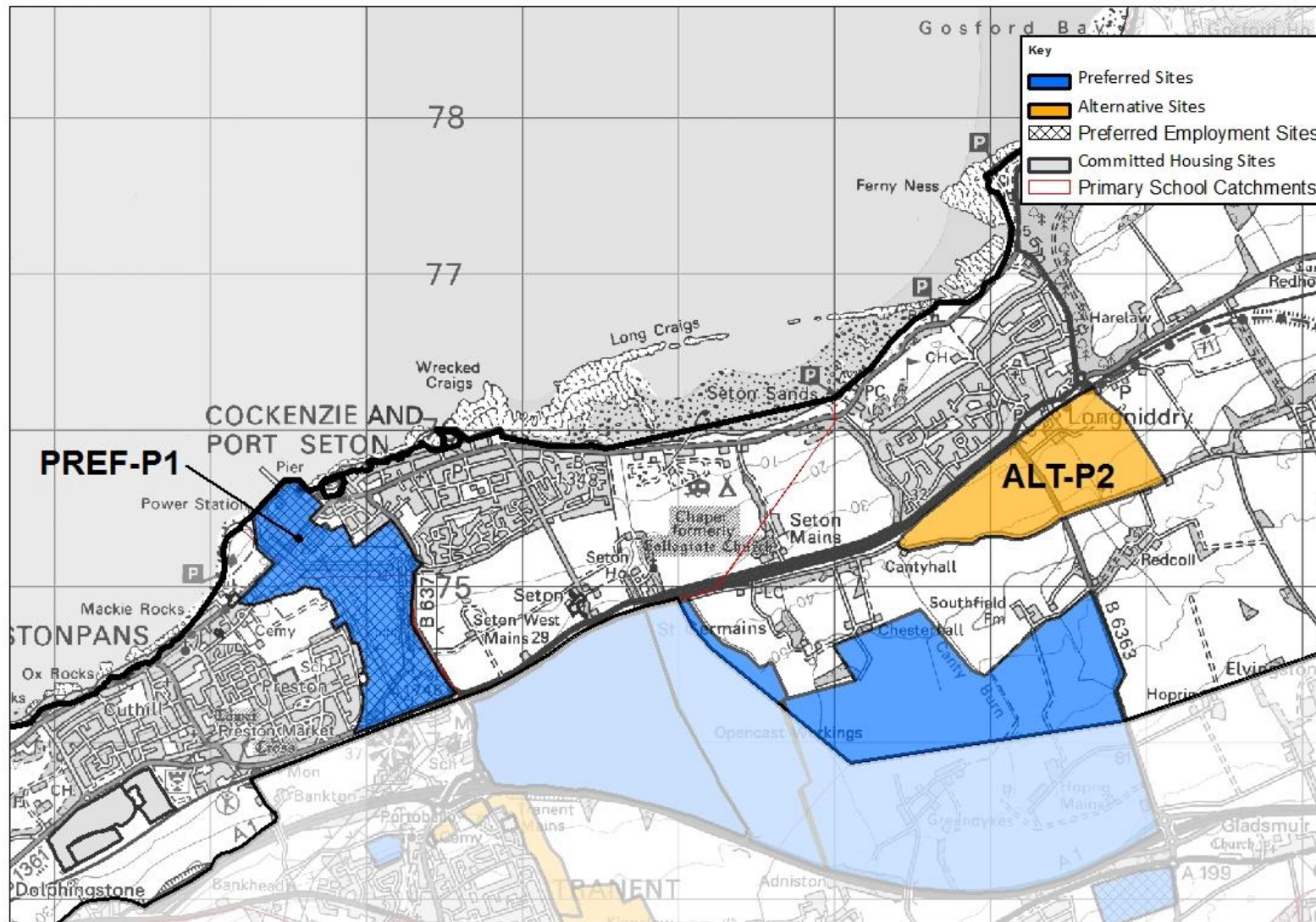
6.31 However, some sites do present nationally important economic development opportunities, which if realised could bring significant economic benefits for these communities, and which Scottish Ministers expect to be reflected in the Local Development Plan.



Preferred Economic Development Opportunities (subject to infrastructure provision and mitigation)

6.32 The preferred strategy supports the retention of existing operational employment areas as well as the employment allocations / land including at Mid Road Prestonpans set out in the current local plan. In addition, the following employment opportunity is also preferred:

- NPF3 supports and provides national development status to the planning permission approved under Section 36 of the Electricity Act to repower Cockerzie Power Station to a gas fired power station and for the associated gas pipeline; carbon capture and storage facilities are also supported here. NPF3 also signposts opportunities for renewable energy related investment at Cockerzie (the 10ha employment land currently allocated at the nearby Blindwells site may be a related opportunity) and notes the importance of the coast between it and Torness for a potential energy hub. NPF3 notes that there is potential for grid connections to potential off shore wind projects as well as converter stations. Developers are to work together and share infrastructure where possible. An application for planning permission in principle has recently been approved for a grid connection and converter station nearby Cockerzie Power Station's former coal handling plant. NPF3 also notes that there may be potential for deep water harbouring facilities and port related activity at Cockerzie in support energy related development. If there is insufficient land at Cockerzie to accommodate competing proposals, priority will be given to those which makes best use of the area's assets and secures the greatest economic benefits. As such, land at and around Cockerzie Power Station and its former coal handling yard should be identified for employment, energy and potential port related development (approximately 80 ha) consistent with NPF3 (**PREF - P1**). The intention would also be to ensure that, in to the longer term, provision is made for decommissioning and restoration plans. Importantly, NPF3s Action Programme notes that there is support a co-ordinated approach to planning for energy-related and other key development at Cockerzie. A comprehensive masterplan would be required. The intention is to reflect this in the LDP and its Action Programme, and to review existing local plan policies and proposals as appropriate.



Preferred Housing Opportunities

6.33 The strategy supports the delivery of existing strategic housing land allocations as well as the other smaller scale housing commitments that form part of the established housing land supply.

Table 15: Prestonpans Cluster - Existing Housing Supply & Preferred New Housing Opportunities						
Site Ref	2009 - 2019	2019 - 2024	2024 - 2032	Total 2009 - 2032	Total Supply	Comments
Existing Supply	134	20	0	154	154	
Expand Existing Sites						
None	0	0	0	0		
New Allocations						
None	0	0	0	0		
<i>Sub Total</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	<i>0</i>	
Totals	134	20	0	154	154	

Reasonable Alternative Site

6.34 At this stage the following site may be reasonable alternative development opportunity.

Table 16: Prestonpans Cluster - Reasonable Alternative Sites & Other Site Options		
Site Ref	Site Name	Comments
ALT-P2	Longniddry South	<p>A southern expansion of Longniddry may be a reasonable alternative development opportunity. There may be potential to identify land capable of accommodating circa 1,000 homes as well as other mixed land uses here. However, it is not clear if an expansion of Longniddry could be achieved without compromising any ability to expand Blindwells. This is particularly so in relation to the capacity of the Gladsmuir A1 (T) Interchange. The land at Longniddry has good accessibility by rail but poorer accessibility by bus, particularly given the low bridge under the East Coast Main Line. A southern expansion of Longniddry would significantly change the character and appearance of this settlement, though it may not lead to the coalescence of settlements. If this site were to be supported there would need to be a clear demonstration that the East Coast Main Line would not act as a barrier to community integration. Currently, given the nature of the limited and constrained crossing points of the rail line available, this is in some doubt, particularly in relation to bus based public transport. There would also be a need to consider the expansion of the station car park, and how routes to access the rail halt from the south could be provided through any expansion area. Improvement to the B6363 would also be required. There would be a need for increased primary education capacity, either through provision of a new primary school at the site with associated catchment review, or by increasing the capacity of Longniddry Primary with a new lower or upper primary facility provided at a separate campus within any expansion area. Secondary education capacity may be provided at Preston Lodge High School, but Blindwells should have priority for this. A comprehensive masterplan demonstrating how new development to the south of the railway line may be integrated with the wider landscape and the existing community to the north, including provision of cycle and pedestrian links, would be required. There would also be a need to ensure delivery of strategic Central Scotland Green Network objectives, including how these would help secure a setting between any expansion of Longniddry and any expansion of Blindwells. Any development would be subject to transport impacts and appropriate mitigation.</p>

Infrastructure

Secondary education

6.35 Preston Lodge High School has existing capacity and the potential to accommodate some further expansion. This could be used to facilitate development of the following sites, subject to catchment reviews where necessary:

- Blindwells is an integral part of the SDP strategy, and an existing committed allocation. It should be given priority for infrastructure provision. The current education catchment and strategy for Blindwells may be reviewed such that, at least in the early years of development, primary pupils from the new settlement could attend Cockenzie Primary School and secondary pupils could attend Preston Lodge. This would allow viable pupil rolls to develop for new facilities to be provided on the Blindwells site; or
- If a Musselburgh based education solution is not found for the Goshen site, it may be included within Preston Lodge High's catchment, subject to a review of cluster and catchment boundaries by the Council; or
- Land at Longniddry may also be accommodated at Preston Lodge should the development of that site be supported.

However, the cumulative impact of any combination of these sites on Preston Lodge High School could not be accommodated by the school, even if it were expanded.

Primary education

6.36 Only Cockenzie Primary School has moderate available capacity and potential capacity for expansion. This may be used to accommodate the early phases of development at Blindwells in a similar way as explained above in relation to secondary school capacity.

6.37 If the expansion of Longniddry were to be supported it would require additional primary school capacity as the existing primary school has little or no capacity for expansion. A new school south of the ECML would do little for community integration. A split school, with the p1-3 and p4-7 delivered on separate sites on either side of the ECML (one being the existing school) would be better for community integration. This does, however, raise issues of increased travel by car between the two campuses, putting particular pressure on the existing narrow railway underbridge. This would be undesirable in transport terms and a potential road safety risk.

Transportation

6.38 Further development in this area will generate impacts on the key links to the trunk road at the Dolphingstone and Bankton Interchanges and is likely to require improvements to these interchanges and at the roads leading to them, as well as provision of opportunities for improved public transport. Associated interventions area likely to include:

- Mitigation of impacts at Old Craighall Junction and improvements to Bankton and Dolphingstone A1(T) Interchanges;
- Provision / safeguarding land for a new rail halt at Blindwells;
- Meadowmill junction (A198 / B1361/ B6371) to Bankton Interchange – potential widening of rail bridge and roundabout improvements;
- Potential for new road connecting the B1348 and B1361 over land at and around Cockenzie Power Station and its former coal handling yard;

6.39 If any development south of the ECML at Longniddry were supported, it would need to link to the railway station and improve accessibility to the southern platforms through the development area. An expansion of the Longniddry station car park would also be necessary. A key strategy would be to encourage car users to access the A1 at the Gladsmuir rather than Bankton Interchange: this would require an upgrade of the B6363 and potentially improvements to the Gladsmuir A1 (T) Interchange. Bus services may be restricted due to the low ECML bridge with clearance for only single deck busses possible. The carriageway under the rail bridge is also narrow but may be able to accommodate a footway to facilitate pedestrian movement between the two sides: if this were to be supported the junction would need to be signalised to control one way movement per phase to create the pedestrian link. There is also another underpass to the east which may offer a potential for pedestrian and cyclist movements. An appropriate safe crossing point on the A198 would need to be established.

Water and Drainage

6.40 The implications of the preferred sites on this area can be accommodated by Scottish Water. It has indicated that capacity exists in its strategic assets to accommodate the preferred sites in the short term. It may be that investment is required in to the medium / longer term to accommodate the cumulative impact of these sites together with those in other local authority areas. Water and drainage impact assessments will be required to establish solutions in to the medium and longer term for strategic assets and for how connections to the local networks will be secured.

Mitigation

6.41 Mitigation requirements will include:

1. Delivery of the green network, including woodland planting, active travel routes and habitat networks and securing an attractive setting for settlements as appropriate;
2. Trunk and local road impacts, including at Old Craighall, arising as a result of the cumulative impact of development including that within East Lothian;
3. Detailed modelling of traffic and air quality impacts to establish if the preferred strategy can be supported in the Proposed LDP, including consideration of cumulative impacts;
4. Traffic and parking management could be considered as measures to ease vehicle flows;
5. Noise impacts and the visual impacts of mitigation requirements arising from increased vehicle flows, the rail network and noise from adjoining land uses will need to be taken into account;
6. Education capacity constraints would need to be overcome;
7. In to the medium / longer term additional strategic foul drainage capacity may be required;
8. Identification of any ground conditions constraints and methods of mitigation;
9. Comprehensive masterplans would be required.

Those parties promoting development sites in this area must work together and with the Council to demonstrate to its satisfaction that the above issues can be satisfactorily addressed and associated mitigation delivered so sites are / can be made effective before they may be included in a Proposed LDP. It is expected that developer contributions will have a significant role to play in securing mitigation as appropriate.

Key Messages: Prestonpans/Cockenzie/Port Seton/Longniddry Cluster

At this stage the preferred development opportunities in the Prestonpans cluster could deliver approximately **154 homes and 80 ha of additional employment land** over the period to 2024. **However, this cluster may also have an important enabling role in providing education capacity for the current 1,600 houses at the Blindwells allocation as well as potentially for any expansion of the new settlement.** In regional terms the Prestonpans cluster is highly accessible, including by public transport. The cumulative impact of additional development on the transport network, including at Old Craighall, is an issue that requires to be resolved. The cluster is in high demand as a place to live and offers the potential for job creation. Strategic water and drainage capacity is available to serve additional development. There are regeneration opportunities, but relevant settlements are constrained from further expansion by environmental and infrastructure constraints, including the green belt, as well as the coastline and East Coast Main Line. To facilitate a National Development set out by NPF3 at Prestonpans / Cockenzie around 80ha of land should be promoted for major employment use, based upon energy related development which may extend to associated port-related activity. Consistent with NPF3 an appropriate area of land should be allocated for this purpose by the LDP. A comprehensive masterplan for the area would be required, including measures to mitigate development related impacts such as transport. For housing development, capacity at Preston Lodge High School could be used and / or the school could be expanded to make some additional education capacity available and how this capacity may be utilised is a significant issue: it could be used in the short term or for the longer term to serve the existing Blindwells allocation and any potential expansion of the new settlement, subject to catchment review. As an alternative, if Goshen were to be supported but a Musselburgh based education solution for that site were not to be found education capacity for its pupils may be provided at Preston Lodge High School, subject to catchment review by the Council. It is unlikely that enough capacity could be provided at Preston Lodge High School to accommodate pupils from Blindwells as well as the Goshen and / or Longniddry sites together. While an expansion of Longniddry may deliver circa 1,000 homes, it is not clear if this could be achieved without compromising the existing Blindwells allocation or undermine any ability to expand the new settlement further - e.g. in terms of education capacity and / or capacity at the Gladsmuir A1(T) Interchange. Notwithstanding this, it would be challenging to secure an appropriate expansion of Longniddry given the difficulties the East Coast Main Line would present to the integration of new development with the existing village. An expansion of Longniddry is not preferred at this stage, but it may be a reasonable alternative opportunity.

Question 12: Prestonpans/Cockenzie/Port Seton/Longniddry Cluster

Do you support the preferred approach to new economic development and housing opportunities in the Prestonpans/Cockenzie/Port Seton/Longniddry cluster?

Please indicate if you support or oppose particular preferred sites, reasonable alternative sites, or other site options, and explain why?

Potential options have been identified for how education capacity might be increased in the cluster. How do you think those options could be funded and delivered?

Where might any new education facilities be located if required?

If you do not support the preferred sites, please indicate what alternative sites you would suggest?

Do you have any other comments on the Prestonpans/Cockenzie/Port Seton/Longniddry cluster area?