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| Document Title | MAIN ISSUES REPORT PART 2 - East Lothian Local Development Plan Main Issues Report and Consultation Arrangements |

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Additional information:

MAIN ISSUES REPORT PART 2

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

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

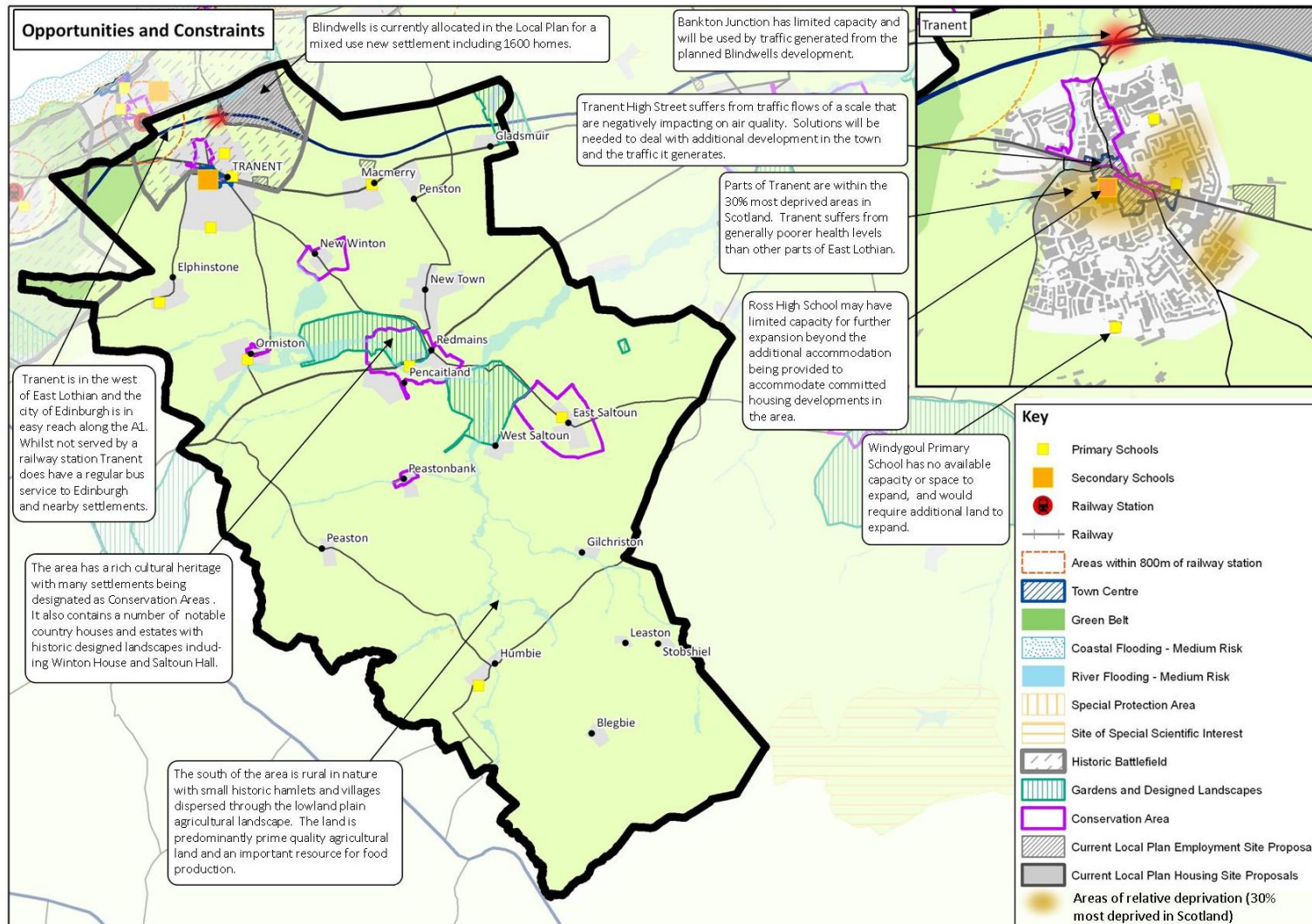
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The Tranent Cluster

- 6.42 Tranent, Macmerry and Gladsmuir are those settlements within Ross High's catchment area that fall within the western part of East Lothian Strategic Development Area (SDA). Consequently, at this stage they can be considered as an area of search for additional strategic land allocations to contribute to SESplan's Strategic Development Plan requirements.
- 6.43 The remaining settlements of Ormiston, Elphinstone, Pencaitland, New Winton, East and West Saltoun and Humble are all within the Tranent Cluster but lie outside the SDA. Consequently, they should not be a focus for additional strategic land allocations. However, sites outwith the SDA may be considered to help meet the East Lothian housing land requirement and to help provide a range of sites of different types and sizes in different locations in order to maintain a five year effective housing land supply at all times. In such circumstances, such housing sites may be identified if they are appropriate ones and if they would help to maintain a five year housing land supply, consistent with SDP Policy 7.

Green Belt & Countryside Around Towns

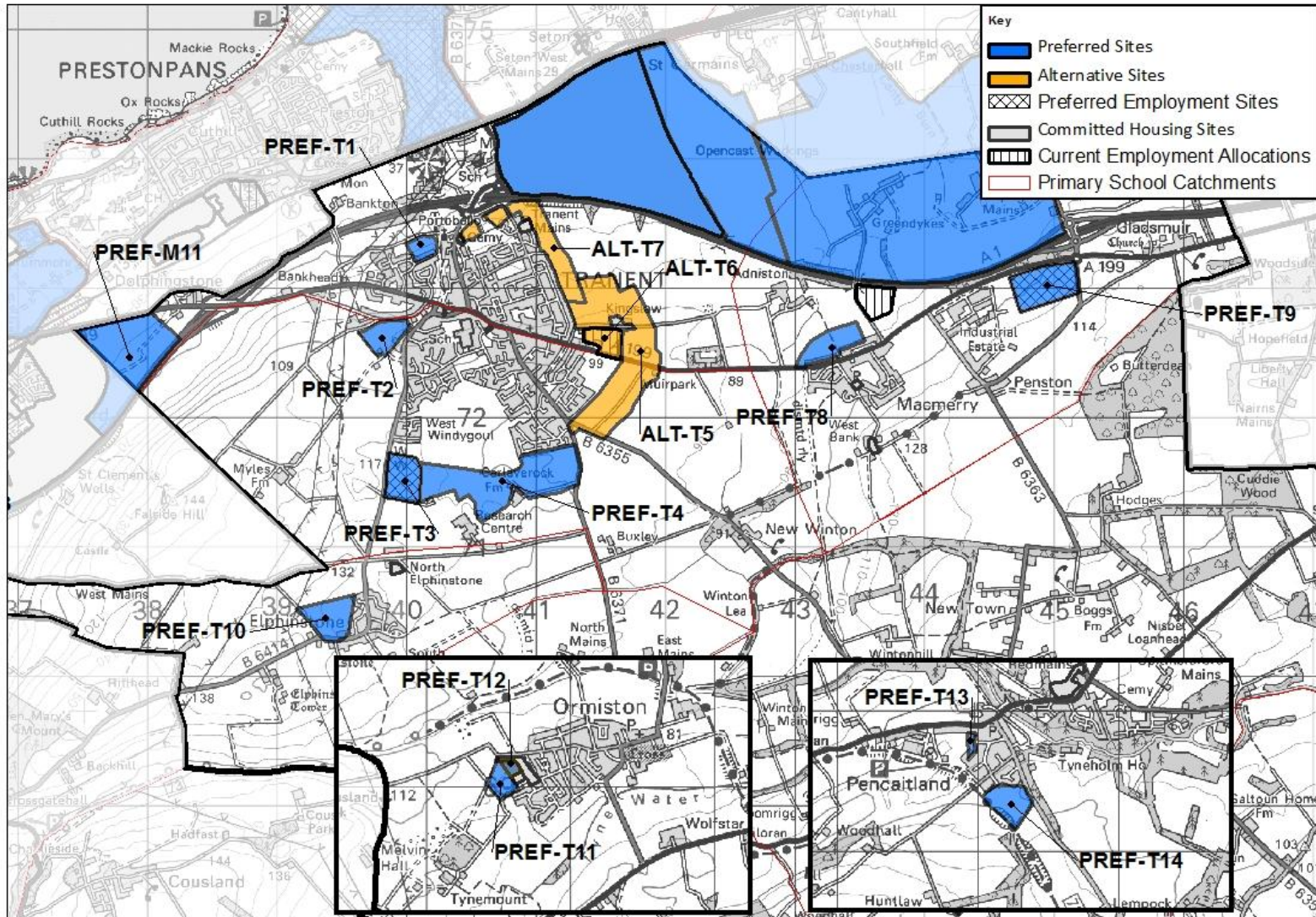
- 6.44 The green belt extends to the western fringes of Tranent. Open land to the north of the settlement is outwith the green belt but it does provide a setting to the town. Since it is undeveloped it also offers views to nearby settlement and the city and regional landmark features, such as Arthur's Seat and the Firth of Forth. There may be a case to extend the green belt to include this land; alternatively, a Countryside Around Town designation may be applied here instead.
- 6.45 The aim of this would be to complement the objectives discussed above for the Prestonpans/Port Seton/Cockenzie/Longniddry cluster for the land between Tranent, the coastal settlements and the Blindwells site. The village of Ormiston has its own unique historic character and landscape setting that also merits consideration for Countryside Around Towns designation for the most sensitive parts of its landscape setting.



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

6.46 The preferred strategy supports the retention of existing operational employment areas as well as the employment allocation of the current local plan at Kingslaw, Tranent. In addition, the following employment opportunities are also preferred at this stage:

- Approximately 15 hectares of land for general industry/business could be promoted on the east side of Macmerry Industrial Estate to provide for an expansion of it adjacent to the Gladsmuir Junction, subject to confirmation of ground conditions, access and suitable landscaping (**PREF - T9**);
- Approximately 9 hectares of land for general industry/business use could be promoted on land to the south west of Windygoul (**PREF - T3**). Provision should be made for pedestrian, cyclist and vehicular connections between this land and the adjacent land preferred for housing development to the east, and for complementary structural landscaping. A joint masterplan with housing opportunity (**PREF – T4**) would be required.



Potential housing opportunities (subject to infrastructure provision and mitigation)

6.47 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. In addition to these sites the following sites are preferred as new housing allocations at this stage.

| Table 17: Tranent Cluster - Existing Housing Supply & Preferred New Housing Opportunities | | | | | | |
|---|-------------|-------------|-------------|-------------------|--------------|--|
| Site Ref | 2009 - 2019 | 2019 - 2024 | 2024 - 2032 | Total 2009 - 2032 | Total Supply | Comments |
| Existing Supply | 135 | 20 | 0 | 155 | 155 | |
| Expand Existing Sites | | | | | | |
| None | 0 | 0 | 0 | 0 | | |
| New Allocations | | | | | | |
| PREF-T4 Windygoul South | 125 | 375 | 50 | 550 | | Windygoul South, Tranent is a preferred land release. A further southern expansion of the town could be promoted for circa 550 homes and other mixed land uses which would also provide for the expansion of Windygoul Primary School, including to accommodate other preferred sites in its catchment. There are concerns about transport impacts including an increased level of through traffic adjacent to Windygoul Primary School and, in the town centre, about the volume of through traffic and air quality impacts. However, traffic routing from this site may be to Edinburgh Road (A199) rather than High Street. Two points of access to the land would be required. The opportunity for or provision of a route between the B6371 and the B6414 through this site and through the adjacent site currently preferred for employment use (PREF – T3) should be secured. Detailed traffic modelling of traffic and air quality impacts is also required to establish if this proposal could be supported in the Proposed LDP. A comprehensive masterplan demonstrating how new development to the south of the town would be integrated with the wider landscape and the existing community to the north, including provision of cycle and pedestrian links, would be required. Suitable separation between the operational employment land to the south would also be necessary. This may be partially achieved in the |

Table 17: Tranent Cluster - Existing Housing Supply & Preferred New Housing Opportunities

| Site Ref | | 2009 - 2019 | 2019 - 2024 | 2024 - 2032 | Total 2009 - 2032 | Total Supply | Comments |
|----------------|--------------------|----------------|----------------|----------------|----------------------|-----------------|--|
| | | | | | | | delivery of adequate open space as well as meeting Central Scotland Green Network objectives at site boundaries. A joint masterplan with employment site PREF – T3 would be required. |
| PREF-T2 | Lammermoor Terrace | 75 | 45 | 0 | 120 | | Lammermoor Terrace, Tranent, is a preferred land release. The allocation of land for approx 120 houses at Lammermoor Terrace could be supported, subject to impact on capacity of signals at Edinburgh Road junction and cumulative impacts on education capacity including at Windygoul Primary School, traffic and air quality (see above). Access from local road network should be possible. Structural landscape planting and open space provision would be required to integrate this site with the surroundings. A masterplan for the site would be required. |
| PREF-T1 | Bankpark Grove | 75 | 5 | 0 | 80 | | Bankpark Grove, Tranent, is a preferred land release. The allocation of land here for 80 houses could be supported, subject to ground conditions, access and cumulative impacts on education, traffic and air quality (see above). The ability to secure access must be proven. This site is within the catchment of Sanderson’s Wynd Primary School. Structural landscape planting and open space provision would be required to integrate this site with the surroundings. A masterplan for the site would be required. |
| PREF-T8 | Macmerry North | 75 | 75 | 0 | 150 | | Macmerry North is a preferred land release. The allocation of land for approximately 150 houses could be supported. The allocation would be subject to suitable landscape proposals, ground conditions, access including cumulative impact on Tranent High Street (including air quality) and education capacity. Access on to the local road network at the A199 should be possible. Any development here should seek to allow connections to be made to Greendykes Road and Chesterhall Avenue. Development of this site would continue the northern expansion of the settlement but retain a setting between it and the A1 (T). Structural landscape planting and open space provision would be required to integrate this site with the surroundings and to provide a setting for the settlement. A masterplan for the site would be required. |

Table 17: Tranent Cluster - Existing Housing Supply & Preferred New Housing Opportunities

| Site Ref | 2009 - 2019 | 2019 - 2024 | 2024 - 2032 | Total 2009 - 2032 | Total Supply | Comments |
|---|-------------|-------------|-------------|-------------------|--------------|---|
| PREF-T11 Tynemount West (Ormiston) | 40 | 30 | 0 | 70 | | Tynemount West, Ormiston, is a preferred land release. The allocation of land for 70 houses here could be supported to complete a logical expansion of the village, subject to ground conditions, access and cumulative impacts on education, traffic and air quality (see above). Site access to the local road network should be possible. Structural landscape planting and open space provision would be required to integrate this site with the surroundings, particularly at the western boundary to emulate the existing urban edge to the south. A suitable masterplan to integrate this site as part of development in the wider area including the existing allocation and PREF – T12 would be required. |
| PREF-T12 Tynemount East (Ormiston) | 16 | 0 | 0 | 16 | | Tynemount East, Ormiston, is a preferred land release. The allocation of land for 16 houses here could be supported to complete the logical allocation for the expansion of the village, subject to ground conditions, access and cumulative impacts on education, traffic and air quality (see above). Site access to the local road network should be possible. A suitable masterplan to integrate this site as part of development in the wider area including the existing allocation and PREF – T11 would be required. |
| PREF-T10 Elphinstone West | 80 | 0 | 0 | 80 | | Elphinstone West is a preferred land release. The allocation of land for circa 80 houses to the north-west side of the settlement could be supported, subject to ground conditions, access and cumulative impacts on education, traffic and air quality (see above). Land is in the same ownership to the south should an expansion of Elphinstone Primary School be required. Provision should be made within the site for turning and parking areas for and adjacent to the existing playing field to the west of the site. The encroachment of built development on to the rising land to the north must be minimised, where there is significant scope to accommodate additional woodland planting to expand the existing shelter belt to the east to contribute to Central Scotland Green Network objectives. There is also scope to accommodate open space to the north of the site and to ensure it connects with the existing open space on Main Street and the adjacent playing field. Structural landscape planting would be required to integrate this site with the surroundings as would a masterplan. |

Table 17: Tranent Cluster - Existing Housing Supply & Preferred New Housing Opportunities

| Site Ref | | 2009 - 2019 | 2019 - 2024 | 2024 - 2032 | Total 2009 - 2032 | Total Supply | Comments |
|-----------------|---|----------------|----------------|----------------|----------------------|-----------------|--|
| PREF-T13 | Woodhall Road (Pencaitland) | 16 | 0 | 0 | 16 | | Woodhall Road, Pencaitland, is a preferred land release. A small scale westward expansion of the settlement to the west of the existing housing area could be supported, subject to ground conditions, access and cumulative impacts on education, traffic and air quality (see above). Access to the site should be achievable via Woodhall Road. Any housing here would be subject to provision of additional education capacity if required. A suitable design to integrate this site with its surroundings would be required. A masterplan for the site would also be necessary. |
| PREF-T14 | Lempockwells Rd (Pencaitland) | 75 | 40 | 0 | 115 | | Lempockwells Road, Pencaitland, is a preferred land release. A southern expansion of Pencaitland to the south of the existing housing area could be supported, subject to ground conditions, access and cumulative impacts on education, traffic and air quality (see above). There are opportunities for integration with the existing urban area and to connect to the adjacent railway walk. Access should be taken from Bruce Grove and / or potentially Lempockwells Road. Areas to the west of the site are elevated and built development should be kept clear of these areas. Significant landscape planting to the southern boundary should be provided as an extension of the significant and mature roadside planting to the east of the site. There are opportunities to complement and expand existing open space on the existing edge of the settlement. Site access needs to be resolved. Any housing here would be subject to provision of additional education capacity if required. Structural landscape planting and open space provision would be required to integrate this site with the surroundings. A masterplan for the site would also be required. |
| PREF-M11 | Dolphingstone (Safeguard circa 400 Homes) | 0 | 0 | 0 | 0 | | This site is detailed within the Musselburgh cluster area – see page 85. |
| | <i>Sub Total</i> | <i>577</i> | <i>570</i> | <i>50</i> | <i>1197</i> | <i>1,197</i> | |
| | Totals | 712 | 590 | 50 | 1,352 | 1,352 | |

Reasonable Alternative Sites & Other Site Options

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

| Site Ref | Site Name | Comments |
|-----------------|-------------------|---|
| ALT-T6 | Kingslaw, Tranent | Site T6 is currently allocated for employment, and the preference is to retain the allocation of the land as such. However, an eastward expansion of Tranent may be a reasonable alternative development opportunity. If there is to be any significant housing/employment growth to the east of Tranent there would need to be a comprehensive and co-ordinated masterplan for such an expansion. A clear approach to the most effective transport solution would also be required. Tranent High Street is at capacity, consequent on levels of through traffic, and ELC Transportation advises that any development which adds significant vehicle through trips to this is unlikely to be acceptable. There is no shortage of potential development sites submitted for consideration on the east side of Tranent: these comprise approximately 57 hectares of land with a capacity for well over 1,000 houses. However, they are all separate submissions, and there is no indication as to how these might be co-ordinated for this land to be comprehensively designed, developed and accessed, specifically how it might deliver an eastern bypass that routes traffic generated by such a proposal to avoid using Tranent High Street to access the A1 (T). There is also concern that an eastern by-pass of Tranent, if connected to the Bankton A1 (T) interchange, would undermine the ability to access Blindwells from that trunk road interchange, particularly if Blindwells were to expand beyond 1,600 homes. Additionally, primary and secondary education solutions are not currently available to support such an expansion, and a larger scale of growth than could be achieved through current submissions may be required to justify, fund and deliver them. |
| ALT-T5 | Tranent East | As above. |
| ALT-T7 | Tranent Mains | As above. In addition, the site submissions for the land to the east of Tranent Cemetery suggest this area be developed for a Park and Ride facility, but it may be a more reasonable alternative site for circa 30 homes, subject to ground conditions, access and education capacity; however, if an eastern Tranent bypass were to be supported as part of any housing land release on the east side of Tranent then this small site could have a significant role in connecting this housing, likely via an improved / realigned Tranent Mains Road, to the Bankton A1(T) Interchange. Overall, the land contributes to the setting of Tranent and its cemetery and its development is not supported at this stage. The submission for the land to the west of the cemetery suggests scope for a budget hotel, nursing home or similar forming a gateway to the town. The land on the west side of Tranent cemetery may also be a reasonable alternative site, if development of land on the east of the cemetery were supported too. If this site to the west of the cemetery were to be developed, it may provide a better location for a Park and Ride facility given its proximity to the A1 (T) and public transport routes than the land to the east. However, whilst the 2009 Strategic Transport Projects Review did identify a need for a Park and Ride Facility around Tranent, it may be better located at Blindwells. Overall, this land makes a significant contribution to the setting of Tranent and its cemetery and its development is not supported at this stage. |

Infrastructure issues

Secondary education

6.49 Ross High has no existing available capacity but has moderate expansion potential which would only be sufficient to accommodate the impact of the preferred sites set out above. This would prevent the school providing any further secondary school capacity.

Primary education

6.50 The main issues here are:

- Sandersons Wynd PS has some potential for further expansion;
- Windygoul, already a large and pressurised primary school, requires further expansion to accommodate current pupil roll projections. This includes a need for additional land. Any campus expansion will have to be southwards onto land that is not in the Council's control and for which submissions have been made for housing. The allocation of this land for housing would allow additional land to be provided for the further expansion of the school and this must be sufficient to accommodate the cumulative impact of development in the catchment area and developer contributions would be sought as appropriate;
- Macmerry PS has some existing capacity and some ability to expand further to accommodate the preferred site, should this be required;
- Outwith the SDA, some capacity exists or some may be provided at Pencaitland / Ormiston / Elphinstone to accommodate preferred sites.

Transportation

6.51 A Transport Assessment submitted for housing development on land south of Windygoul suggests that a transport solution for the development of land there exists, and that the traffic impacts could be mitigated, by employing a one-way gyratory system using Bridge Street, New Row and Elphinstone Road. Another option may be to make a section of Church Street between the junction of High Street and Winton Place one way (northbound) and to make Winton Place one way (southbound). New signalised crossings would be introduced. The acceptability of any solution, and the consequential impacts on air quality, is to be confirmed by ELC Transportation, taking in to account the cumulative impact of development. It is also considering the potential for a new road to the west that would link Elphinstone Road via Crookston Road to the Wallyford A1 (T) Interchange.

6.52 Tranent High Street experiences high levels of through traffic which has impacted on amenity and air quality in the town centre. Any further significant expansion of Tranent beyond the preferred strategy may require an eastern bypass which would provide relief to the High Street by allowing vehicles from the south an alternative, more direct access to the Bankton A1 (T) Interchange. The intention would be to link this to any new road to the Wallyford A1 (T) Interchange as described above.

6.53 A new eastern bypass of Tranent might connect into the Bankton junction via a link from Tranent Mains Road, just north of Tranent Mains Farm, and connect with a roundabout at the south of Tranent at the junction between the B6371 and B6355. The provision of such a road connection would be linked to the release of any land for development on the east side of Tranent and be funded by developers. However, there is no indication the various landowners here are aligned to promote such a solution. It is also not clear if this scale of development could be accommodated by the Bankton A1 (T) Interchange together with Blindwells traffic without undermining the ability to deliver the current Blindwells allocation or any expansion of it.

Water and Drainage

6.54 The implications of the preferred sites at Tranent can be accommodated by Scottish Water. It has indicated that capacity exists in its strategic assets to accommodate the preferred sites there 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 and for how connections to the local networks will be secured.

Mitigation

6.55 Mitigation requirements will include:

1. Delivery of the green network, including woodland planting, active travel routes and habitat networks;
2. Air Quality is being monitored and any new development must not undermine air quality objectives;
3. Trunk and local road impacts, including at Old Craighall, arising as a result of the cumulative impact of development including that within East Lothian;

4. Traffic and parking management measures are being considered for the town centre to ease vehicle flows and to assist in meeting air quality objectives;
5. Detailed modelling of traffic and air quality impacts to establish if the preferred strategy can be supported in the Proposed LDP;
6. Education capacity constraints would need to be overcome;
7. In to the medium / longer term additional strategic foul drainage capacity may be required, and solutions may be needed for settlements south of Tranent in the short term;
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: Tranent Cluster

At this stage the preferred development opportunities in the Tranent cluster could deliver approximately **1,350 additional homes and 24 ha of additional employment land** over the period to 2024 and beyond. The cluster is highly accessible, including by public transport. It 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 certain settlements have constraints to further expansion by environmental and infrastructure constraints and the need to ensure that the ability to deliver existing land allocations will not be undermined, including Blindwells. These factors will influence if and how settlements in this cluster may be expanded. The cumulative impact of additional development on the transport network is an issue that requires to be resolved, particularly at Tranent High Street and at Old Craighall and the Dolphinstone, Bankton and Gladsmuir A1 (T) interchanges. There may be potential for a new road to the west of Tranent that would link Elphinstone Road via Crookston Road to the Wallyford A1 (T) Interchange (in which case cumulative impacts at that interchange would need to be considered too). Subject to traffic and air quality impacts being acceptable, additional land for circa **550** homes as a further southern expansion of Windygoul could be supported. However, there is a need for a capacity expansion at Windygoul Primary School, with sufficient campus land to be provided to accommodate pupils from recent housing allocations as well as the cumulative impact of any additional housing development in its catchment area. This could be facilitated by a housing land release south of Windygoul, with sufficient school campus land for the cumulative impact of development in the area sought in association with it. A suitable separation between the operational employment land to the south would also be required as would a comprehensive masterplan. The opportunity for or provision of a route between the B6371 and the B6414 through this site and through the adjacent site currently preferred for employment use (**PREF – T3**) would also need to be secured. The release of land for approximately **80** houses at Bankpark Grove and **120** houses at Lammermoor Terrace could also be supported, subject to education capacity and access. However, certainty is required that the traffic/air quality impacts of any further land release at and around Tranent can be mitigated on a cumulative basis as appropriate. Elsewhere, Macmerry may be able to provide land with a capacity of about **150** houses, Elphinstone and Ormiston each approximately **80** and Pencaitland approximately **100**. Ross High School is able to be expanded only as much as required to accommodate preferred housing sites. Without an eastern bypass of Tranent there is little opportunity for any further significant housing growth here. To promote this would require a very substantial land release on the east side of the town, with consequent impacts on education provision, including an increase in secondary school capacity in the cluster, for which there is no clear solution. Any such scale of expansion accessed off the Bankton A1(T) Interchange would also need to be considered in view of the current as well as longer term vision for Blindwells new settlement – i.e. any expansion of Tranent must not compromise the current Blindwells allocation or any potential expansion of the new settlement. As such, an eastern expansion of Tranent is not supported at this stage.

Question 13: Tranent Cluster

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

Do you think that all of the preferred housing sites can be delivered in the anticipated timeframe? Please 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?

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?

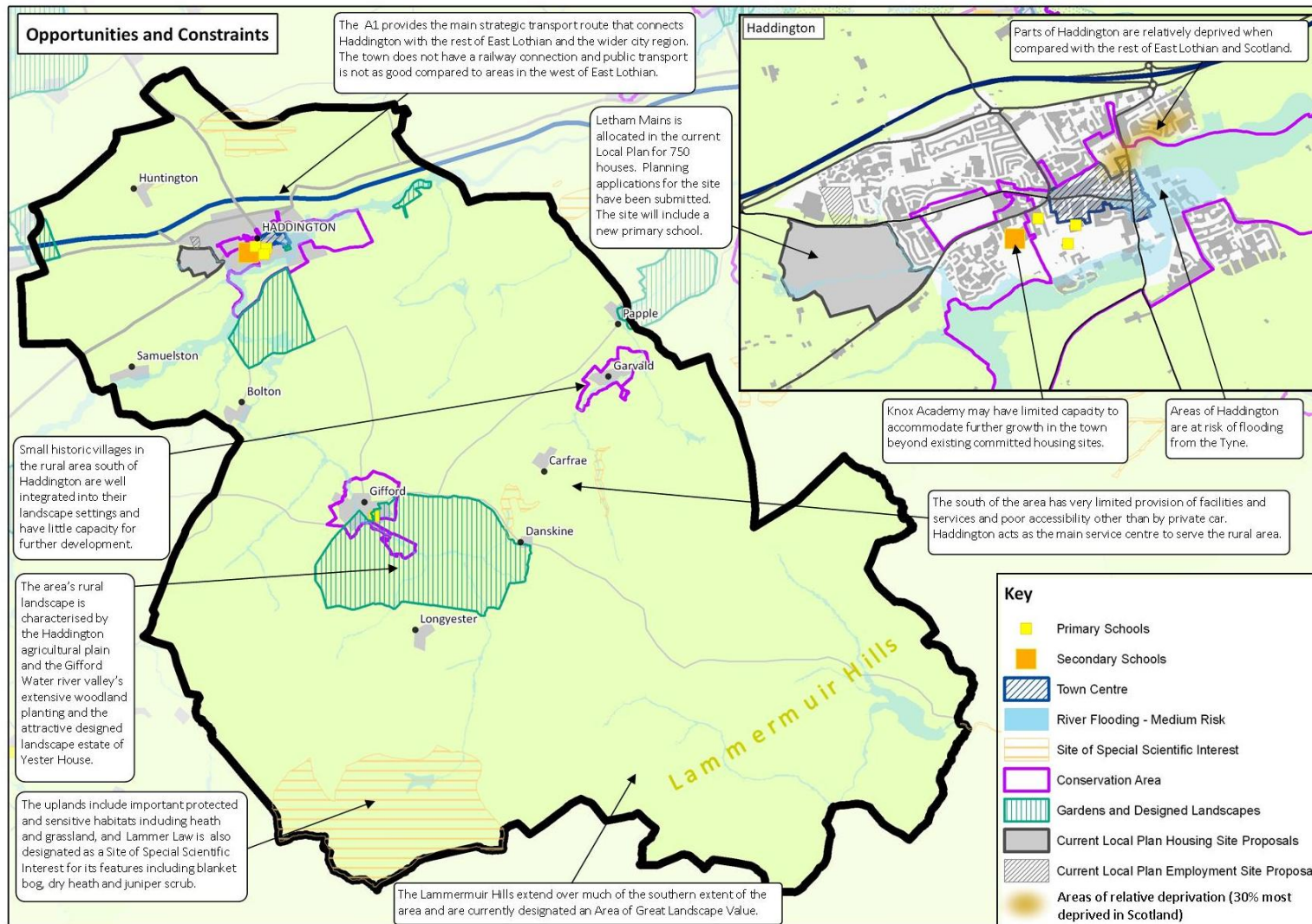
Do you have any other comments on the Tranent cluster area?

The Haddington Cluster

- 6.56** Haddington is the only settlement within Knox Academy's catchment area that is within the East Lothian Strategic Development Area (SDA). As it is outwith the western part of this SDA it is not preferred as the focus for identifying additional strategic development land at this stage. However, it could contribute to meeting this as the settlement is within the SDA.
- 6.57** The remaining settlements within the Haddington Cluster are not within the East Lothian SDA. They should not be a focus for additional strategic land allocations. However, sites outwith the SDA may be considered to help meet the housing land requirement and to help provide a range of sites of different types and sizes in different locations to help maintain a five year effective housing land supply at all times. In such circumstances, housing sites may be identified if they are appropriate ones and if they would help to maintain a five year housing land supply, consistent with SDP Policy 7.

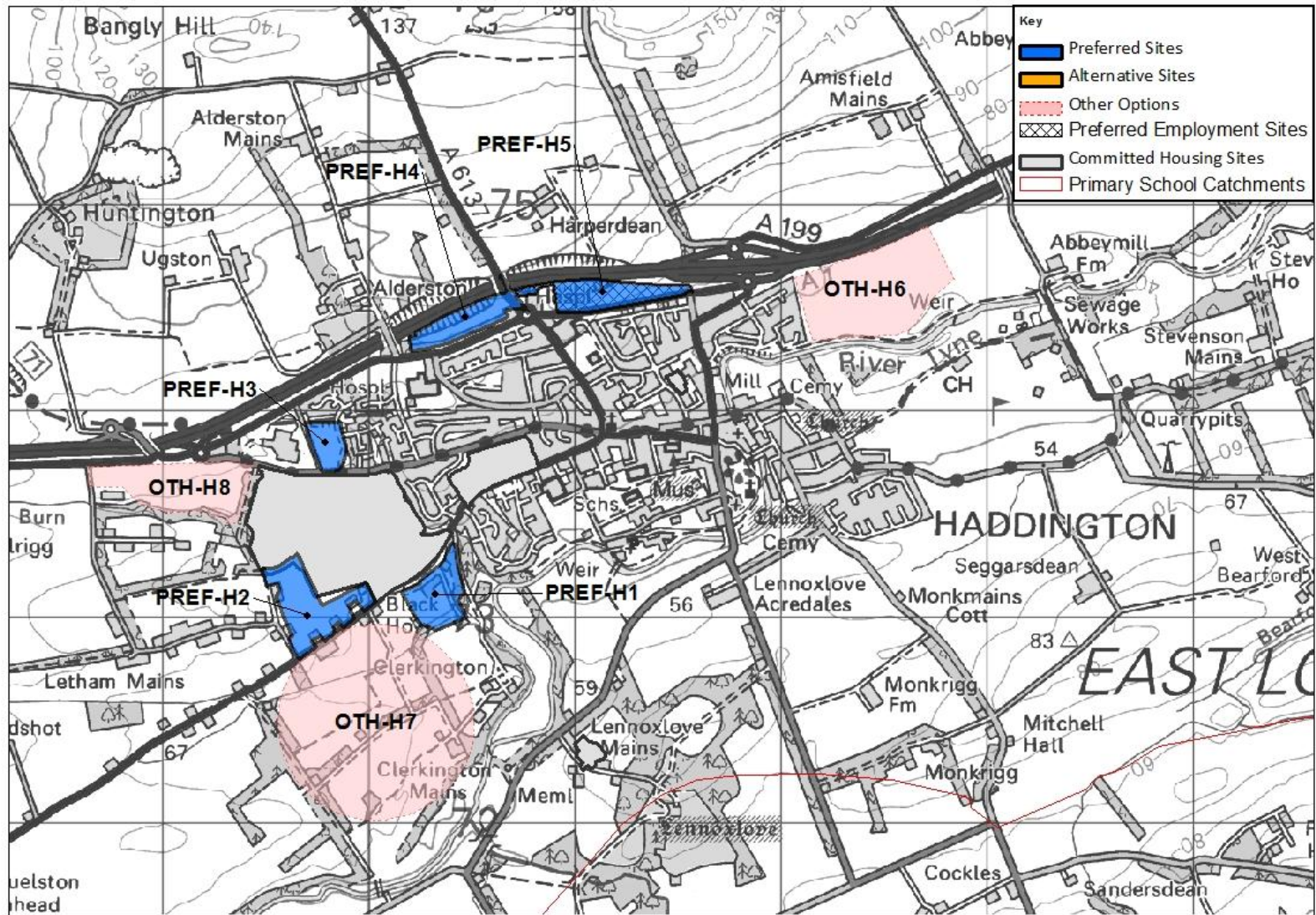
Countryside Around Towns

- 6.58** Haddington is located centrally within East Lothian and developed on low-lying land beside a crossing of the River Tyne. This feature is intrinsic to the settlement's character and landscape setting. The Tyne is also prone to flooding. The existing housing land allocation at Letham Mains has largely met the boundaries within which the landscape character and setting of the town can be conserved, and there is now limited scope for further development without compromising the town's historic character and setting. As such, consideration of a Countryside Around Town designation at Haddington is appropriate.
- 6.59** The A1(T) provides a robust boundary to the north of Haddington, its role now reinforced by an appeal decision supporting housing between it and the housing at Haldane Avenue. On the town's north-west edge, the tree-lined access to Letham House provides a strong edge to the Letham Mains allocation, and is linked to other tree belts providing a robust town boundary. The Letham Mains allocation, extending out from the town's western edge, would define a natural town boundary where it meets with the Letham Mains smallholdings. Further development to the south of the town may compromise the character and appearance of the Clerkington estate which, although not included on the National Inventory of Gardens and Designed Landscapes is an 18th century parkland designed landscape of regional or local importance that contributes to the setting of Haddington. However, as a consequence of an appeal decision, the south-west edge of the town has been extended into the Dovecot area. The land south of the Tyne extending from Clerkington to Seggarsdean and south of Amisfield Estate makes a significant contribution to the setting, character and appearance of the town. To the east the Amisfield and the open land north of the Tyne, provides expansive views of the town and its setting.



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

- 6.60 The preferred strategy supports the retention of existing operational employment areas. At this stage it also promotes a change in approach to land at Gateside East (**PREF – H3**). It could be promoted for employment use (circa 1ha) in association with a housing use (60 dwellings).
- 6.61 In addition to the above, at this stage the preferred strategy also includes a new employment opportunity at Peppercraig Quarry. Approximately 7 hectares of land for business use could be promoted to the east of the quarry, potentially including business, hotel and leisure uses. Access is achievable from the A199. Footpaths and crossing points would be required (**PREF –H5**).



Preferred housing opportunities (subject to infrastructure provision and mitigation)

6.62 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. In addition to these sites the following sites are preferred as new housing allocations at this stage.

| Site Ref | 2009 - 2019 | 2019 - 2024 | 2024 - 2032 | Total 2009 - 2032 | Total Supply | Comments |
|------------------------------|-------------|-------------|-------------|-------------------|--------------|---|
| Existing Supply | 480 | 396 | 0 | 876 | 876 | |
| Expand Existing Sites | | | | | | |
| PREF-H2 Letham Mains | 0 | 242 | 33 | 275 | | Letham Mains is a preferred land release – i.e. the extension of the current Letham Mains housing allocation to allow development within the adjacent south west field. This would be a logical addition to the expansion of the settlement. This additional area of land could accommodate around 275 dwellings. Access could be provided from the road layout internal to the current allocation and related proposals should allow for this. Additional education capacity could be provided at the new Letham Mains Primary School once delivered and Knox Academy would require to be expanded. Structural landscape planting and open space provision would be required to integrate this site with the surroundings and to provide a setting for the settlement and adjacent Letham Mains Smallholdings. A masterplan would be required which integrates the development within its surroundings and complements and does not undermine the existing local plan proposal or any associated planning permission. A masterplan for the site would be required. |
| New Allocations | | | | | | |
| PREF-H1 Dovecot | 113 | 0 | 0 | 113 | | Dovecot is a preferred land release for 113 houses and this should be supported to reflect a planning appeal decision. |
| PREF-H3 Gateside East | 60 | 0 | 0 | 60 | | Gateside East is a preferred land release. A mixed use housing and economic development use on Gateside East including 60 homes should be supported to reflect ELC 'minded to grant' decision on recent mixed use planning application. |

Table 19: Haddington Cluster - Existing Housing Supply & Preferred New Housing Opportunities

| Site Ref | 2009 - 2019 | 2019 - 2024 | 2024 - 2032 | Total 2009 - 2032 | Total Supply | Comments |
|-------------------|-------------|-------------|-------------|-------------------|--------------|---|
| PREF-H4 Alderston | 70 | 19 | 0 | 89 | | Alderston is a preferred land release. Development of land to the west of Aberlady Road for 100 houses should be supported to reflect a planning appeal decision. |
| <i>Sub Total</i> | <i>243</i> | <i>261</i> | <i>33</i> | <i>537</i> | <i>537</i> | |
| Totals | 723 | 657 | 33 | 1413 | 1,413 | |

Reasonable Alternative Sites & Other Site Options

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

Table 20: Haddington Cluster - Reasonable Alternative Sites & Other Site Options

| Site Ref | Site Name | Comments |
|-----------------|-----------|---|
| OTH – H7 | Dovecot | Land at Dovecot is another option for the expansion of Haddington, although no site submission has been received during the call for sites. A further significant expansion of the preferred Dovecot site, possibly in association with the provision of land for employment, may be an option subject to education capacity and access issues being resolved. However, education capacity at primary level in Haddington is very constrained. Very limited additional education capacity, if any, could be made available at existing catchment schools. Any further development at Dovecot would need to find an education solution, possibly involving provision of a new primary school. The scale of development necessary to justify this would generate additional vehicle trips onto the surrounding road network. The provision of a new link road through the adjacent Letham Mains site once in place (in to the medium term) may help mitigate this, but the ability to fully mitigate all transport impacts would need to be demonstrated to the Council’s satisfaction. Additionally, the impact on the character and setting of the Clerkington Designed Landscape would require mitigation. Structural landscape planting and open space would be required to integrate any development with the surroundings and to provide an attractive edge and setting for the town. |
| OTH – H6 | Amisfield | Land at Amisfield is another option for the expansion of Haddington. Land to the east of Haddington between the A1 and the River Tyne may accommodate around 500 homes, subject to education and access solutions. However, the site is visually exposed, including from the A1 and A199, and the southern part is in an area of flood risk. The open nature of the land is important to the setting of Haddington and the adjacent Amisfield Designed Landscape and conservation area. Development here would have a harmful impact on the character and setting of the town and these cultural heritage areas. It is also uncertain if a suitable and deliverable site access can be achieved. |

| | | |
|-----------------|----------------|---|
| OTH – H8 | West Letham | Land at West Letham is another option for the expansion of Haddington. It may accommodate up to 600 dwellings. Site access from local road network may be possible. However, the site is visually exposed and beyond what will become the well defined urban edge to the town provided by the Letham Mains policy woodland. The open nature of this land is important to the character and setting of Haddington and development here would harm this. Education capacity would be a significant issue as with other sites in the area. Integration with the existing settlement is also a concern, including via path links. |
|-----------------|----------------|---|

Infrastructure issues

Secondary education

6.64 Knox Academy has some limited capacity for expansion subject to solutions being found for the loss of sports pitches and the redesignation of an existing right of way.

Primary education

6.65 There are constraints on the availability of any further primary school capacity in this cluster other than that needed for the preferred sites. Gifford's Yester Primary is the only primary school with any potential for significant expansion, but this settlement is outwith the SDPs SDA.

6.66 A new primary school is required to accommodate pupils from the existing Letham Mains allocation and the current proposed masterplan does allow limited scope for further expansion of the new primary school, subject to programming of housing development. Some temporary education capacity for the Letham Mains site, outwith the catchment area defined for the new Letham Mains school, may be made available in advance of the new school's completion at Letham Mains. It would not be possible for a new Letham Mains primary school to take pupils from a wider catchment area without further extending the school's footprint and / or campus. This would (i) require a review of existing masterplan proposals at Letham Mains (ii) require a school catchment review and (iii) mean the release of any additional housing land would be predicated on the timing for completion of the primary at Letham Mains.

Transportation

6.67 ELC Transportation has advised that the cumulative impact of potential development sites in the west of Haddington may result in significant traffic

impact on the west Haddington/B6471 corridor and town centre. It would require a model to be prepared to define the scale of the cumulative traffic impacts. ELC Transportation can facilitate the modelling exercise but its funding, or the provision of components of the model, should be provided by developers wishing to develop sites on this corridor.

Water and Drainage

6.68 The implications of the committed sites on this area could be accommodated by Scottish Water, but enhancements will be required to strategic waste water assets to bring forward additional development in the area in the medium and long term. Water and drainage impact assessments will be required to establish solutions for the medium and longer term for strategic assets and for how connections to the local networks will be secured.

Mitigation

6.69 Mitigation requirements will include:

1. Delivery of the green network, including woodland planting, active travel routes and habitat networks;
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 traffic modelling of traffic impacts to establish if the preferred strategy can be supported in the Proposed LDP;
4. Traffic and parking management could be considered as measures to ease vehicle flows;
5. Education capacity constraints would need to be overcome;
6. Foul drainage constraints would need to be overcome;
7. Identification of any ground conditions constraints and methods of mitigation;
8. 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: Haddington Cluster

At this stage the preferred development opportunities in the Haddington cluster could deliver approximately **1,400 additional homes and a minimum of 8 ha of employment land** over the period to 2024 and beyond. In regional terms Haddington is accessible, including by public transport, but less so than settlements to the west of East Lothian and Dunbar. The cumulative impact of additional development on the transport network, including at Old Craighall, is an issue that needs to be resolved. The traffic impacts of further development, in particular in the west of Haddington, would require to be modelled. Haddington is in high demand as a place to live and offers some potential for job creation, but fewer homes are sold here than locations further west. Solutions for additional strategic water and drainage capacity will be required to accommodate further additional development here beyond current commitments and these are unlikely to come forward in the short term. The settlements are also constrained from further expansion by environmental and / or other infrastructure constraints and the need to ensure the ability to deliver existing land allocations and / or planning permission will not be undermined. The availability / ability to provide additional primary education capacity at Haddington Infant and Primary School is a significant constraint to further housing development beyond current commitments. The new Letham Mains Primary School, once delivered, may provide an opportunity to increase primary education capacity within the town to facilitate further housing development in the medium to long term as an expansion of that strategic site. The preferred housing sites can be accommodated while conserving the character and setting of Haddington and education capacity can be provided to accommodate them. Other options for the expansion of Haddington are land to the east at Amisfield, land to the south-west as a further expansion of Dovecot, and land to the north west beyond Letham Mains. With the possible exception of a further expansion at Dovecot (in view of the recent planning appeal decision there) all of these sites would have an adverse impact on the town's character and setting. In addition, if any further housing development were to be supported at Haddington, primary and secondary education solutions would need to be found.

Question 14: Haddington Cluster

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

Do you think that all of the preferred housing sites can be delivered in the anticipated timeframe? Please 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?

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?

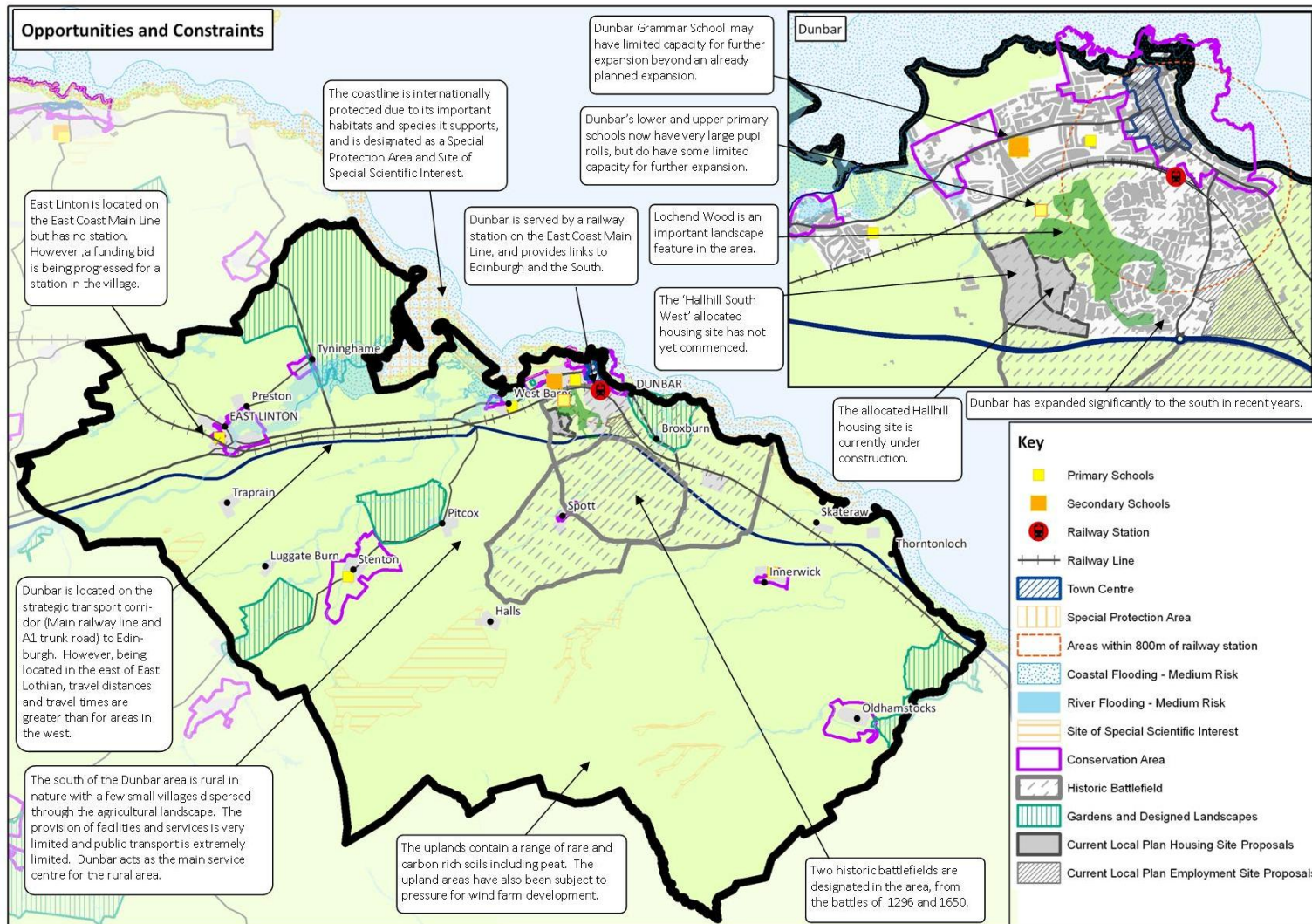
Do you have any other comments on the Haddington cluster area?

The Dunbar Cluster

- 6.70** Dunbar / Belhaven, West Barns, East Linton and Innerwick are those settlements that are within the East Lothian Strategic Development Area (SDA). As they are outwith the western part of the SDA these settlements are not preferred as the focus for identifying additional strategic development land at this stage. However, they could contribute to this as they are within the SDA. Yet Innerwick is a small settlement by comparison and any development there must reflect this as well as the character of the settlement and local area.
- 6.71** The remaining area/settlements are not considered to fall within the East Lothian SDA. Consequently, they should not be a focus for additional strategic land allocations. However, sites outwith the SDA may be considered to help meet the East Lothian housing land requirement and to help provide a range of sites of different types and sizes in different locations in order to maintain a five year effective housing land supply at all times. In such circumstances, such housing sites may be identified if they are appropriate ones and if they would help to maintain a five year housing land supply, consistent with SDP Policy 7.

Countryside Around Towns

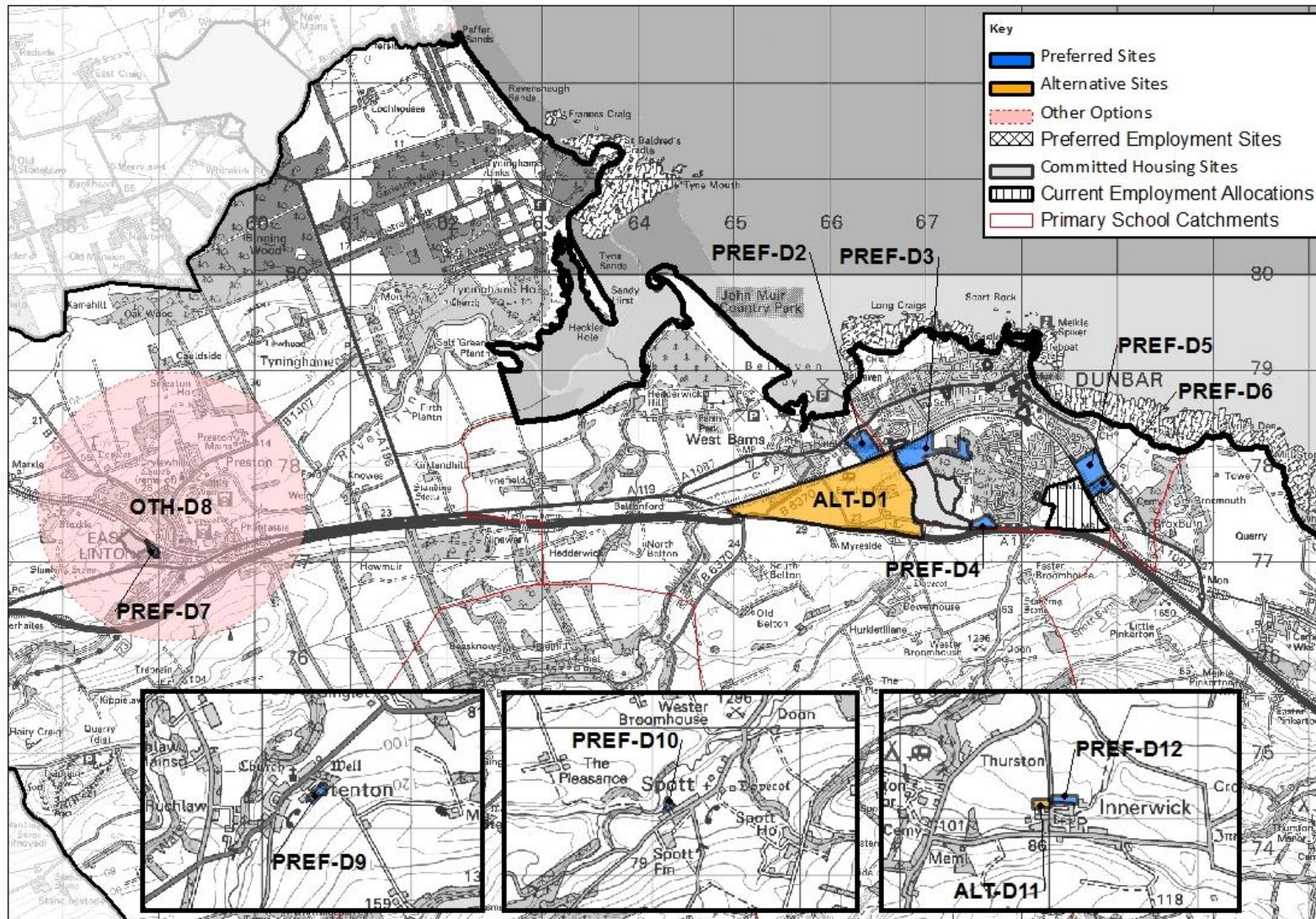
- 6.72** In terms of the setting and separate identities of settlements, some separation between Dunbar / Belhaven and West Barns should be retained. This is particularly important in view of a recent appeal decision at Beveridge Row, where housing development will extend further west from Dunbar / Belhaven towards West Barns.
- 6.73** Similarly, East Linton developed in a low topographical feature / river valley and recent housing allocations there have sought to contain the settlement within this landscape feature. As such, Countryside Around Town designations may be considered in these locations.



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

6.74 The preferred strategy supports the retention of existing operational employment areas as well as the employment allocations of the current local plan. The following approach is preferred at this stage:

- Retain approximately 12 hectares of undeveloped land currently allocated for employment at Spott Road, Dunbar (not including the 7.5ha with planning permission for a solar energy park);
- Approximately 3.4ha of land at Newtonlees Dunbar could be promoted for employment use (**PREF – D6**);
- Approximately 1ha of land at East Linton Auction Mart should be retained for employment use (**PREF – D7**)



Preferred housing opportunities (subject to infrastructure provision and mitigation)

6.75 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. In addition to these sites the following sites are preferred as new housing allocations at this stage.

| Table 21: Dunbar Cluster - Existing Housing Supply & Preferred New Housing Opportunities | | | | | | | |
|--|------------------|-------------|-------------|-------------|-------------------|--------------|---|
| Site Ref | | 2009 - 2019 | 2019 - 2024 | 2024 - 2032 | Total 2009 - 2032 | Total Supply | Comments |
| Existing Supply | | 605 | 256 | 0 | 861 | 861 | |
| Expand Existing Sites | | | | | | | |
| | None | 0 | 0 | 0 | 0 | | |
| New Allocations | | | | | | | |
| PREF-D3 | Hallhill North | 0 | 125 | 125 | 250 | | Land at Hallhill North is a preferred land release. The allocation of all or part of this land for housing development could be supported, subject to any need to safeguard land for the expansion of adjacent education facilities in the longer term (see comments on Eweford Farm below) and the provision of additional education capacity for this site. Site access from local road network should be possible. However, vehicle access to this site must only be taken from the Hallhill site to the south. Pedestrian and cycle routes must be provided, including connections to the north of the rail line. Development of this site would need to follow Hallhill south west's provision of associated access, services and drainage infrastructure. Completions from this site are not anticipated until 2019 at the earliest. A masterplan for the site would be required. |
| PREF-D5 | Newtonlees North | 75 | 175 | 0 | 250 | | Land at Newtonlees North is a preferred land release. The allocation of land for approximately 250 houses between Beachmount Place and Newtonlees, Dunbar could be supported; however, approximately 3.4ha of land to the south of this site is also supported for employment / community use. |

Table 21: Dunbar Cluster - Existing Housing Supply & Preferred New Housing Opportunities

| Site Ref | 2009 - 2019 | 2019 - 2024 | 2024 - 2032 | Total 2009 - 2032 | Total Supply | Comments |
|----------------|---------------|-------------|-------------|-------------------|--------------|---|
| | | | | | | Vehicular access should be possible off A1087, and a separate access should also be possible in the event of a mixed use proposal. The impact of development here on the local road network would need to be assessed, particularly on the Spott Road and Queens Road junction. Education capacity and access to schools would need to be resolved for any housing, potentially involving provision of a footpath across the adjacent employment land via an underpass of the East Coast Main Rail line the delivery of which must be investigated. Structural landscape planting and open space provision would be required to integrate this site with the surroundings and to provide a setting for the settlement. A masterplan would be required. |
| PREF-D4 | Brodie Road | 50 | 0 | 0 | 50 | Land at Brodie Road is a preferred land release. The allocation of land for approximately 50 houses at Hallhill, Dunbar, between Brodie Road and the A1, opposite Steadings Crescent could be supported subject to additional education capacity being made available. This site is currently allocated for hotel use but provision for this facility has already been made elsewhere in the town at Spott Road. Vehicular access should be taken from Brodie Road only and pedestrian links with the surrounding area would be required. Appropriate structural landscape planting and open space provision would be required to integrate this site with the surroundings and to provide a setting for the settlement. Any requirement for noise mitigation may also need to be investigated. A masterplan would be required. |
| PREF-D2 | Beveridge Row | 40 | 50 | 0 | 90 | Land at Beveridge Row is a preferred land release. The allocation of land at Beveridge Row, Belhaven for 90 houses reflects a planning appeal decision and should therefore be supported. |

Table 21: Dunbar Cluster - Existing Housing Supply & Preferred New Housing Opportunities

| Site Ref | | 2009 - 2019 | 2019 - 2024 | 2024 - 2032 | Total 2009 - 2032 | Total Supply | Comments |
|-----------------|------------------------|----------------|----------------|----------------|----------------------|-----------------|---|
| PREF-D12 | Innerwick East | 18 | 0 | 0 | 18 | | Land at Innerwick East is a preferred land release. The allocation of land for approximately 18 houses immediately north of Kirk Brae, Innerwick could be supported, subject to availability of education capacity. Access may be achievable from C125 with existing 30mph extended southwards. The site has good accessibility to the primary school. A suitable design to integrate this site as part of the settlement and local area would be required as would a masterplan. |
| PREF-D10 | St John Street (Spott) | 6 | 0 | 0 | 6 | | Land at St John's Street, Spott is a preferred land release, subject to availability of education capacity. The allocation of land for approximately 6 houses immediately north of St John's Street could be supported. Access should be achieved via St John's Street. A suitable design to integrate this site as part of the settlement and local area would be required. A masterplan for the site would be required. |
| PREF-D9 | The Crofts (Stenton) | 16 | 0 | 0 | 16 | | Land at The Crofts, Stenton is a preferred land release, subject to availability of education capacity. The allocation of land for approximately 16 houses immediately south of The Crofts could be supported. Access should be achieved via the B6370 and the U188. A suitable design to integrate this site as part of the settlement and local area would be required as would a masterplan. |
| | <i>Sub Total</i> | <i>205</i> | <i>350</i> | <i>125</i> | <i>680</i> | <i>680</i> | |
| | Totals | 810 | 606 | 125 | 1541 | 1,541 | |

Reasonable Alternative Sites & Other Site Options

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

| Site Ref | Site Name | Comments |
|-----------------|--------------------------------------|---|
| ALT – D1 | Eweford | Land at Eweford Farm may be an alternative site with capacity for approximately 1,000 homes and other mixed land uses. However, allocations at Hallhill continue to be prioritised. To further consider Eweford in the longer term matters to be resolved include the means of access to the site, in particular how this might be provided without adding additional vehicle journeys to Spott Road in Dunbar. Additional connections may be considered to Thistly Cross roundabout. A second vehicle access may need to be provided over the East Coast Main Line where it is in cutting. This would provide a direct vehicular access into Dunbar from the A1 Expressway over the East Coast Main Line to connect with Edinburgh Road. Land to the west of the housing at Beveridge Row may provide scope for the alignment of such a route. In terms of education provision, potential options include provision of a new primary school for Eweford, an expansion of Dunbar Primary School potentially utilising part of the preferred Hallhill North site for this, or a potential replacement for West Barns Primary School to be provided within and as part of the solution for the Eweford site. The replacement of West Barns Primary School may offer an alternative option for the alignment of any road crossing of the rail line. Dunbar Grammar would also require to be expanded and to allow for this the relocation of sports pitches south of the rail line is likely to be required. In addition, the landscape setting and the need to retain separation between Dunbar / Belhaven and West Barns will be key considerations, as will CSGN objectives and provision of open space and structural landscaping. Consideration would need to be given to how any structural planting at Eweford could be connected to Lochend Woods to the east. |
| ALT-D11 | Innerwick West | Land at Innerwick West may be a reasonable alternative development site, subject to education capacity and access. A suitable design to integrate this site as part of the settlement and local area would be required. |
| OTH-D8 | East Linton Expansion Area of Search | East Linton may be considered as a location for further development in the short, medium or long term, subject to education capacity. There is support for a new rail halt and this would significantly enhance the village's accessibility in regional terms, if delivered. However, any further housing development here would have to take account of the sensitive landscape setting of the historic village, which was established in the valley of the River Tyne, beneath Pencaraig Hill. Recent housing allocations have sought to contain the settlement within this landscape feature and additional growth may undermine this characteristic of the settlement. Lower lying land within the valley is constrained by cultural heritage features or by risk of flooding. Any significant encroachment on to higher land to the north, south and west would not be supported. However, there may be limited scope for additional housing development without significantly compromising the character and setting of the settlement if it were to expand to the east. However, land to the west is closer to any rail halt, the primary school and main road network. |

Infrastructure issues

Secondary education

6.77 Dunbar Grammar has the potential for some increase in its existing capacity if solutions are found for the loss of sports pitches, for example the identification of additional land off-site.

Primary education

6.78 All primary schools have available capacity or capacity for expansion other than Stenton Primary School.

Transportation

6.79 There are concerns about the capacity of Spott Road and Queens Road junction in Dunbar to accommodate additional vehicle flows, being main arterial routes in to the town. The provision of additional pedestrian and cycle access between the northern and southern parts of the town separated by the rail line would also be required in association with any new development.

6.80 At East Linton a new rail station is being supported in ongoing studies, but there is currently no commitment to its provision / funding from the Scottish Government. It is subject to the provision of a new service to East Linton, part of the Scotrail franchise due to be awarded in October 2014.

Water and Drainage

6.81 The implications of the committed sites on this area could be accommodated by Scottish Water, but enhancements will be required to strategic waste water assets to bring forward additional development in the area in the medium and long term. Water and drainage impact assessments will be required to establish solutions for the medium and longer term for strategic assets and for how connections to the local networks will be secured.

Mitigation

6.82 Mitigation requirements will include:

1. Delivery of the green network, including woodland planting, active travel routes and habitat networks;
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. Traffic and parking management could be considered as measures to ease vehicle flows;
4. 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;
5. Education capacity constraints would need to be overcome;
6. Foul drainage constraints would need to be overcome;
7. Identification of any ground conditions constraints and methods of mitigation;
8. 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

6.83 The 100ha north west quarry by Dunbar which was previously used for limestone extraction and is now being restored. The LDP would support the use of this area for biodiversity enhancement and conservation, wildlife viewing, nature based tourism and environmental education. The plan at Appendix 4 illustrates the potential boundaries for such a designation.

Key Messages: Dunbar Cluster

At this stage the preferred development opportunities in the Dunbar cluster could deliver approximately **1550 additional homes and 16.4 ha of employment land** over the period to 2024 and beyond. In regional terms Dunbar is accessible, including by public transport, but less so than settlements in the west of East Lothian. The Council supports the provision of a new rail halt at East Linton but delivery of that facility is yet to be confirmed. The cumulative impact of additional development on the transport network, including at Old Craighall junction, is an issue that needs to be resolved. The traffic impacts of further development here require to be modelled. The area is in demand as a place to live, but fewer homes are sold here than in locations further west. The cluster also offers some potential for job creation, but a significant amount of employment land is allocated here already but has not been developed for employment uses: the existing supply of economic land in this area is sufficient for foreseeable needs and its retention would be consistent with the SDP and complement the additional housing which may be delivered at the preferred sites. This would also help reduce the need to travel as well as the distance that need be travelled to access employment opportunities locally. Solutions for additional strategic water and drainage capacity will be required to accommodate further additional development beyond current commitments and this is unlikely to be resolved in the short term. The preferred housing sites at Dunbar can be accommodated with the provision of additional education capacity as can the preferred housing opportunities at Spott, Stenton and Innerwick. Dunbar Infant and Primary School has the capability to expand further than required to accommodate current commitments. However, it is projected to be the largest primary school in East Lothian and further significant expansion of the facility may not be supported. Additional primary school facilities would be required to accommodate any further significant housing development around Dunbar / Belhaven / West Barns. One option for this would be at Eweford Farm, where a new primary school could be provided in association with circa 1,000 homes there; another option might be for any new primary school at Eweford to serve such a development but also be made large enough to replace West Barns Primary School; either approach would require school catchment review. A new road crossing of the East Coast Main Line would also be sought to address future circulatory and severance issues to the town centre, and to provide access for the Eweford site should it come forward. This may provide an opportunity for a new road alignment over the East Coast Main Line. Significant growth in the cluster would require expansions to Dunbar Grammar, requiring the reprovision of sports pitches potentially south of the rail line on land which is not owned by the Council, possibly on part of the site at Hallhill North (see PREF – D3). If a new rail halt at East Linton is deliverable, an expansion of that settlement may be considered. Environmental and infrastructure constraints at East Linton would need to be taken in to account if any further development were to be directed to that settlement.

Question 15: Dunbar Cluster

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

Do you think that all of the preferred housing sites can be delivered in the anticipated timeframe? Please 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?

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?

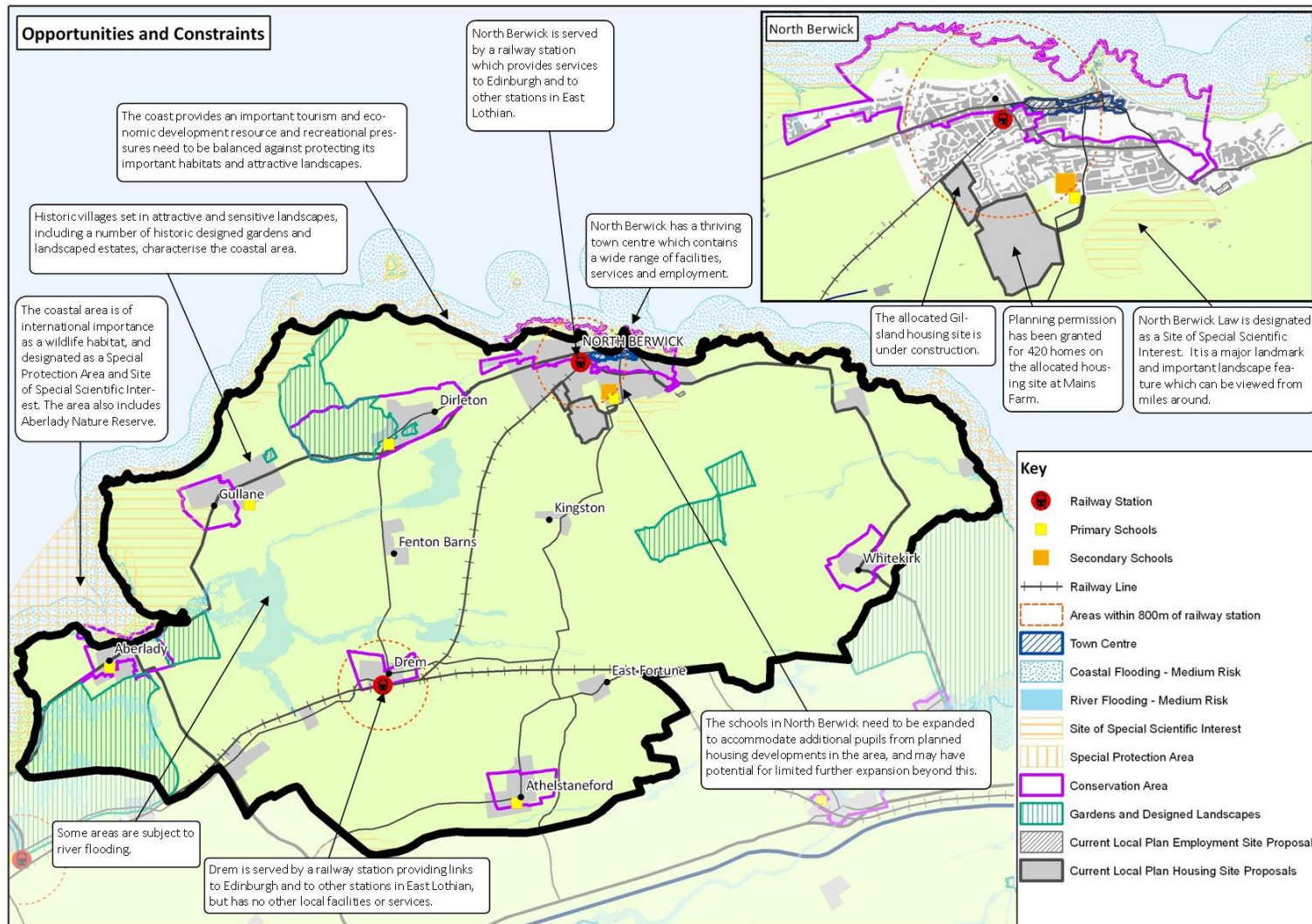
Do you have any other comments on the Dunbar cluster area?

The North Berwick Cluster

- 6.84 With the exception of Drem, the North Berwick area, including settlements such as Aberlady, Dirleton and Gullane, is not within the East Lothian SDA. Consequently, in view of this, and because the area is to the east of East Lothian, it should not be a focus for additional strategic land allocations at this stage.
- 6.85 However, sites outwith the SDA may be considered to help meet the East Lothian housing land requirement and to help provide a range of sites of different types and sizes in different locations in order to maintain a five year effective housing land supply at all times. In such circumstances, such housing sites may be identified if they are appropriate ones and if they would help to maintain a five year housing land supply, consistent with SDP Policy 7.

Countryside Around Towns

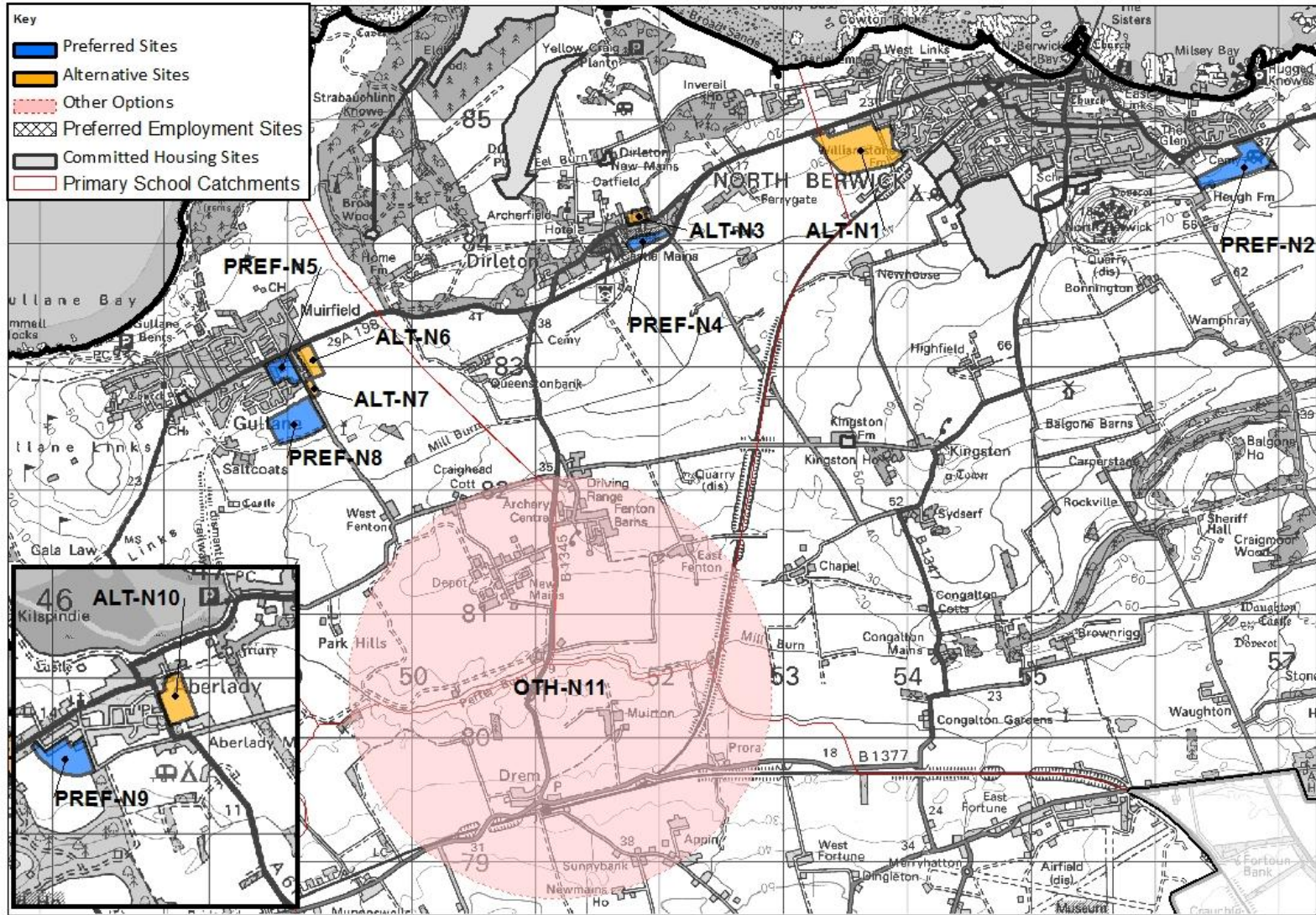
- 6.86 In terms of the setting of North Berwick, some separation between North Berwick Law and the southern urban edge of the town should be retained, reflecting the recreational value of the Law, that it is a local landmark, and that parts of it are designated as a Scheduled Monument and as a Site of Special Scientific Interest. This opportunity is particularly relevant in view of the large area of landscape parkland to be provided to the south of the nearby Mains Farm development. This, in combination with the existing open land around the Law and associated network of core paths and rights of way, presents an opportunity to promote an extended open area with recreational value south of North Berwick and around North Berwick Law. The eastern approach to North Berwick includes coastal and countryside views, including of the Law, that are part of the landscape setting of the town. As such, Countryside Around Town designations may be considered in these locations. The coastal villages of Aberlady, Dirleton and Gullane have their own unique character and landscape setting also merit consideration for Countryside Around Towns designation for the most sensitive parts of their landscape setting.



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

6.87 The preferred strategy supports the retention of existing operational employment areas as well as the employment allocations of the current local plan. In addition, the following employment opportunity is also preferred at this stage:

- Approximately 9 hectares of land at Tantallon Road could be promoted for a mixed use development of housing and business land (**PREF – N2**). It must be demonstrated that the rising land on the west side of the site adjacent to the Heugh and existing operation employment area can be developed, and that development can be sensitively integrated in to the landform here. In particular, new buildings must provide an attractive approach to the town and must not be of a height that would breach the prominent ridge line which is part of the landform leading to North Berwick Law. The Council will expect the housing, as a minimum, to facilitate the servicing of the business land. This is the most logical location within the town in which to secure land for business use. The amount of land to be provided for employment here will be a matter for the LDP; however, the Council would expect around 33% of any mixed use land allocation here to be used for business.



Preferred housing opportunities (subject to infrastructure provision and mitigation)

6.88 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. In particular, there is continued support for the existing strategic sites at Mains Farm and at Gilsland (circa 540 homes). However, the built development footprint approved at Mains Farm is the maximum southern extent of development that the Council supports here to retain the landscape setting of the settlement and North Berwick Law. It is here where there may be merit in considering a Countryside Around Town Designation. In addition to existing sites the following sites are preferred as new housing allocations at this stage.

| Table 23: North Berwick Cluster - Existing Housing Supply & Preferred New Housing Opportunities | | | | | | | |
|---|----------------|-------------|-------------|-------------|-------------------|--------------|---|
| Site Ref | | 2009 - 2019 | 2019 - 2024 | 2024 - 2032 | Total 2009 - 2032 | Total Supply | Comments |
| Existing Supply | | 449 | 307 | 0 | 756 | 756 | |
| Expand Existing Sites | | | | | | | |
| None | | 0 | 0 | 0 | 0 | | |
| New Allocations | | | | | | | |
| PREF-N2 | Tantallon Road | 75 | 25 | 0 | 100 | | The land at Tantallon Road on the eastern edge of North Berwick is a preferred land release, subject to education capacity and access. The site is adjacent to an existing employment area and a mixed use proposal could be promoted here, comprising circa 100 homes, employment and some commercial uses. The housing development should be used to enable the servicing of additional employment / commercial land. However, there are issues in terms of site access which must be resolved, particularly in respect of employment land. Landscape impact and impacts on the setting of the settlement and on North Berwick Law are key considerations. Law Primary School is to be expanded to accommodate the pupils from existing housing commitments. There is very limited capacity to accommodate additional housing as the expanded primary school will be contained by a |

Table 23: North Berwick Cluster - Existing Housing Supply & Preferred New Housing Opportunities

| Site Ref | | 2009 - 2019 | 2019 - 2024 | 2024 - 2032 | Total 2009 - 2032 | Total Supply | Comments |
|----------------|--------------------------------|----------------|----------------|----------------|----------------------|--------------|--|
| | | | | | | | realignment of Haddington Road. North Berwick High School is capable of further expansion beyond that needed for current commitments, but this is subject to securing additional campus land from an area safeguarded in the current local plan. Education capacity would need to be provided. A masterplan would be required. |
| PREF-N5 | Fire Service College (Gullane) | 75 | 25 | 0 | 100 | | The closure of the Gullane Fire Training School presents a brownfield redevelopment opportunity, suitable in principle for a mix of housing (circa 100 homes, employment uses and tourism uses. Any housing development here would be subject to education capacity and access. A vehicular route between the C111 and Muirfield Drive must be provided. A masterplan for the site would be required. |
| PREF-N8 | Saltcoats (Gullane) | 75 | 75 | 0 | 150 | | Land at Saltcoats Gullane is a preferred land release, subject to education capacity. The land could be promoted for approximately 150 houses on the south side of Gullane. Development of this land would allow for a logical southern expansion of the settlement, and potentially provision of expanded education and open space facilities. Development here would mirror the settlement pattern to the north of High Street, and provide new housing adjacent to the existing primary school. Access may be taken from the east of the site, and pedestrian links provided from the site's northern boundary to the existing urban area, including to the primary school. Appropriate structural landscape planting and open space provision would be required to integrate this site with the surroundings and to provide a setting for the settlement. A masterplan for the site would be required. |
| PREF-N4 | Castlemains (Dirleton) | 30 | 0 | 0 | 30 | | Land at Castlemains Place Dirleton is a preferred land release, subject to education capacity. The site could be promoted for the |

Table 23: North Berwick Cluster - Existing Housing Supply & Preferred New Housing Opportunities

| Site Ref | 2009 - 2019 | 2019 - 2024 | 2024 - 2032 | Total 2009 - 2032 | Total Supply | Comments |
|----------------|------------------|-------------|-------------|-------------------|--------------|---|
| | | | | | | development of approximately 30 homes. Access may be provided from Castle Mains Place, and will not be permitted from Station Road. While this area is open, is part of the setting of the settlement and provides for open views to Dirleton castle on approach to the settlement, a section of the site to the north may be developed without harming these characteristics. Appropriate design and landscape planting and open space provision would be required to integrate this site with the surroundings and to provide a setting for the settlement, including the retention of views to Dirleton Castle. A masterplan for the site would be required. |
| PREF-N9 | Aberlady West | 75 | 25 | 0 | 100 | Aberlady West is a preferred land release. The allocation of the site for approximately 100 homes could be supported, subject to education capacity and access. A prerequisite of this proposal would be to provide a new link road though the land to connect Kirk Road with the A198, utilising the exiting priority junction at The Pleasance to avoid traffic passing the primary school from the new housing area. This would also minimise the disruption to trees along the roadside boundary, which are an important part of the character of the coastal route and the approach to the settlement. Structural landscape planting would be required to help integrate development with the surroundings. A masterplan for the site would be required. |
| | <i>Sub Total</i> | <i>330</i> | <i>150</i> | <i>0</i> | <i>480</i> | <i>480</i> |
| | Totals | 779 | 457 | 0 | 1236 | 1,236 |

Reasonable Alternative Sites & Other Site Options

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

| Table 24: North Berwick Cluster - Reasonable Alternative Sites & Other Site Options | | |
|---|------------------------------|---|
| Site Ref | Site Name | Comments |
| ALT-N1 | Ferrygate | Land at Ferrygate may represent a reasonable alternative development opportunity, subject to education capacity. The site may be promoted for approximately 200 homes. Access can be taken from the A198, but suitable pedestrian routes to school and the rail halt would need to be provided. Law Primary School is to be expanded to accommodate the pupils from existing housing commitments. There is very limited capacity to accommodate additional housing as the expanded primary school will be contained by a realignment of Haddington Road. North Berwick High School is capable of further expansion beyond that needed for current commitments, but this is subject to securing additional campus land. Landscape impact and impacts on the setting of the settlement and conservation area are also key considerations, but structural planting does exist to the west of the site. |
| ALT-N3 | Foreshot Terrace (Dirleton) | The land at Foreshot Terrace Dirleton may represent a reasonable alternative development opportunity, subject to education capacity. It is well screened by trees from the road to the south though would encroach northwards into open countryside. It is within the Conservation Area and its impact on the character of the village would be a key consideration. Access may be possible from Ware Road but the ability to achieve adequate visibility splays is uncertain. |
| ALT-N7 | Fentoun Gait South (Gullane) | Land at Fentoun Gait South to the east of Gullane may be an alternative development opportunity, subject to education capacity. This site would be a continuation of the existing development, set back from the Greywalls key view corridor (see below). Access issues would need to be resolved and structural landscape planting would be required to help integrate development with the surroundings. |
| ALT-N6 | Fentoun Gait East (Gullane) | The land at Fentoun Gait East may be an alternative development opportunity, subject to education capacity. However, the land is important to the setting of the settlement, and is also located to the south of Greywalls Garden and Designed Landscape and a number of Category A listed buildings. Open views southwards from these gardens and buildings over the site and across to the Garleton Hills and Lammermuirs were intentionally framed to form their principal vistas. Some very limited development of housing on land to the south of the A198 might be possible. This may only be the case if it were a continuation of the existing housing to the west, and if were to align with the existing settlement edge to the north of the A198. It may be that this could be achieved without significantly affecting views from Greywalls southwards and the settings of the listed buildings and garden and designed landscape. However, access to the site is unlikely to be achievable in an acceptable manner. Structural landscape planting would be required to help integrate development with the surroundings. |
| ALT-N10 | Aberlady East | Land at Aberlady East may be an alternative development opportunity, subject to education capacity. However, this site is sensitive in landscape terms, and is within the Conservation Area and is visible in long distance views from the Garleton Hills towards the coastal Area of Great Landscape Value. The site is also nearby the Aberlady Bay Local Nature Reserve and the SPA, and there may be natural heritage issues. |

| | | |
|----------------|---|--|
| | | Access may be achieved from Haddington Road, but junction spacing could be an issue. There is a TPO at the northern site boundary and nearby listed buildings, designed landscapes and scheduled monuments. Traffic may also route through the village if travelling west. Structural landscape planting would be required to help integrate development with the surroundings. |
| OTH-N11 | Potential Drem Expansion Area of Search | Drem benefits from a railway station on the East Coast Main Line, though this is served only by trains from the North Berwick branch line. It has very limited public transport accessibility by other modes, and no other facilities. The road network through Drem is also inadequate to support a significant scale of growth. However, together with the area of employment uses at Fenton Barns to the north, this general location may present an opportunity for a significant urban expansion in the medium to long term, should one be required to meet future housing requirements. The area is relatively free from statutory designations and other constraints although it does form part of the main Pink Footed Geese feeding area. Drem and the land to its north and east is a conservation area. There are also areas of flood risk and a gas pipeline runs close to the eastern edge of Fenton Barns. If a major development were to be promoted here there are broadly two options: 1) to make it of a size that would be able to support a new primary school at circa 1000 homes, or 2) to make it of a size that would support a new secondary school at circa 5000 - 6000 homes. In the case of the former it is unlikely that such a scale of growth would support a reasonable range of local amenities and facilities; this would likely require a scale of growth equivalent to that needed to support a new secondary school. |

Infrastructure issues

Secondary education

6.90 North Berwick High has some expansion potential, but additional campus land would be required to secure this. However, whilst land is safeguarded in the current local plan that would allow for this, it is not currently in the Council's control. This land safeguard will be continued by the LDP.

Primary education

6.91 Some capacity/expansion potential exists at all primary schools within this cluster with the exception of Dirleton and Athelstaneford. The current local plan allocates/safeguards land for any required expansion of Law Primary School campus and this should also be continued; however, this expansion is intended only to provide capacity for existing commitments, and the school may not be able to expand further.

Transportation

6.92 North Berwick experiences significant visitor numbers, particularly during summer months and traffic and parking management measures are being

considered in relation to this. However, the most significant issue is the impact that additional development in the area would have on the local road network. A number of these roads also provide access to and through coastal and inland settlements. The impact of through traffic is a related concern.

Water and Drainage

6.93 In North Berwick drainage capacity is a significant constraint on further development / strategic development beyond existing commitments and its foul drainage catchment area, which includes Dirleton. While it may be technically possible to overcome this constraint there is likely to be a considerable funding requirement and lead-in timescale to secure the delivery of solutions that would allow consideration of any further significant development in this area.

Mitigation

6.94 Mitigation requirements will include:

1. Delivery of the green network, including woodland planting, active travel routes and habitat networks;
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. 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. Traffic and parking management could be considered as measures to ease vehicle flows;
5. Education capacity constraints would need to be overcome;
6. Foul drainage constraints would need to be overcome;
7. Identification of any ground conditions constraints and methods of mitigation;
8. 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: North Berwick Cluster

At this stage the preferred development opportunities in the North Berwick cluster could deliver approximately **1,230 additional homes and 3ha of employment land** over the period to 2024 and beyond. North Berwick is accessible, including by public transport, but less so than the main settlements in the SDA. North Berwick does however have a rail halt. The cumulative impact of additional development on the transport network, including at Old Craighall junction, is an issue that needs to be resolved. The area is in demand as a place to live, but fewer homes are sold here than in locations further west. The North Berwick cluster offers some potential for job creation, and an expansion of an existing operational employment area is proposed in association with housing development. Solutions for additional strategic water and drainage capacity, and the very significant investment required to increase this, will be required to accommodate additional strategic development / development beyond current commitments and this is unlikely to be resolved in the short term. The preferred mixed use housing and employment site at Tantallon Road North Berwick may be accommodated through a further modest expansion of Law Primary School if possible once expanded. Elsewhere in the cluster, primary education capacity may be provided to accommodate preferred housing opportunities at Dirlerton, Gullane and Aberlady. North Berwick High School is able to expand further to accommodate current commitments and the preferred housing sites in its catchment. However, to achieve this additional campus land may be required from the area safeguarded for this in the adjacent Mains Farm site, as may the relocation and reprovision of an existing synthetic sports pitch within the current campus of the school. Although North Berwick and the coastal settlements in this cluster are not in the SDA, by virtue of a rail halt on the North Berwick Branch Line, the small scale settlement of Drem is within the SDA. However, Drem has very limited public transport accessibility by other modes, and no community facilities; it is also not within the west of the SDA. The road network through the settlement is also inadequate to support a significant scale of growth. However, together with the area of mixed uses at Fenton Barns to the north, this general location may present an option for a significant urban expansion in the medium to long term, should this be required to meet any future housing requirements for East Lothian, such as any set out in any review of the current SDP. The area is relatively free from statutory designations and other constraints, although there is a conservation area designation around Drem and the wider area forms part of the main Pink Footed Geese feeding area. There are areas of flood risk and a gas pipeline runs close to the eastern edge of Fenton Barns. If a major new development were to be promoted here there are broadly two options for this: 1) to make it of a size that would be able to support a new primary school at circa 1,000 homes, or 2) to make it of a size that would support a new secondary school at circa 5,000 homes. In the case of the former it is unlikely that such a scale of growth would support a reasonable range of local amenities / facilities; rather, to achieve this would likely require a scale of growth equivalent to that needed to support a new secondary school.

Question 16: North Berwick Cluster

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

Do you think that all of the preferred housing sites can be delivered in the anticipated timeframe? Please 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?

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 North Berwick cluster area?

BLINDWELLS NEW SETTLEMENT

Blindwells New Settlement

- 6.95** The SDP confirms an ongoing commitment to Blindwells as a location for a new settlement during the SDP period and beyond. Development of the land at Blindwells subject to the current local plan proposal provides an opportunity to make good use of previously developed land with degraded landscape character. A west to east phasing of development at the current allocation is required. It benefits from direct access to the strategic road network and the location is well served by public transport with potential to improve this in future. The amount of development that can be delivered at the existing allocated site during the plan period is largely dependent on how long it will take to remediate the land.
- 6.96** Importantly, the Blindwells location is within the SDA. There is potential for a significant expansion beyond the eastern boundary of the current allocation onto other previously developed land, and beyond this onto greenfield land. Prioritising the redevelopment of land is a justification for continuing to support a west to east phasing of development should Blindwells be able to expand. If capable of expansion, Blindwells could help accommodate a significant amount of any future growth directed to East Lothian. This may help minimise any need to direct further significant strategic development to 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. These are important justifications for selecting the Blindwells location for development and for considering its development potential into the longer term.
- 6.97** In these circumstances SPP allows new settlements to be promoted over the further expansion of existing ones³⁸. Accordingly, 'The Blindwells Expansion Area of Search' is shown on the plan on the next page. It is within this general area where the scope to expand Blindwells will be tested through this MIR consultation. Importantly, during the 'call for sites' exercise not all of the landowners in this area of search suggested to the Council that they are willing to make their land available for development. This may constrain some land within 'The Blindwells Expansion Area of Search' from being considered effective and compromise the ability to find comprehensive solutions for the development of a single larger new settlement using this entire area, as would be required by the SDP. Whilst it may be that the outcome of the MIR testing is that all of the land to the east of the existing Blindwells allocation shown in 'The Blindwells Expansion Area of Search' could feature in any expansion of the new settlement, it may be that only some of that land should be used for this purpose, or even that Blindwells should not grow any larger than the existing allocation.
- 6.98** A confirmed ability to expand Blindwells would provide a number of important opportunities for East Lothian. One of these would be for a new town centre to be provided at Blindwells of a size that may also serve surrounding communities. This could help regenerate nearby settlements whose

³⁸ Scottish Government SPP paragraph 53 - 54

economic base has declined and which have limited scope for further expansion. Located in the highly accessible western part of East Lothian, where most of the area's population is, Blindwells is also a logical location to promote employment and inward investment opportunities. Provision of new jobs, community services as well as potentially further education facilities here would improve the availability and proximity of these amenities to the rest of East Lothian's communities. This could also help reduce the need to travel as well as travel distances and related CO₂ emissions.

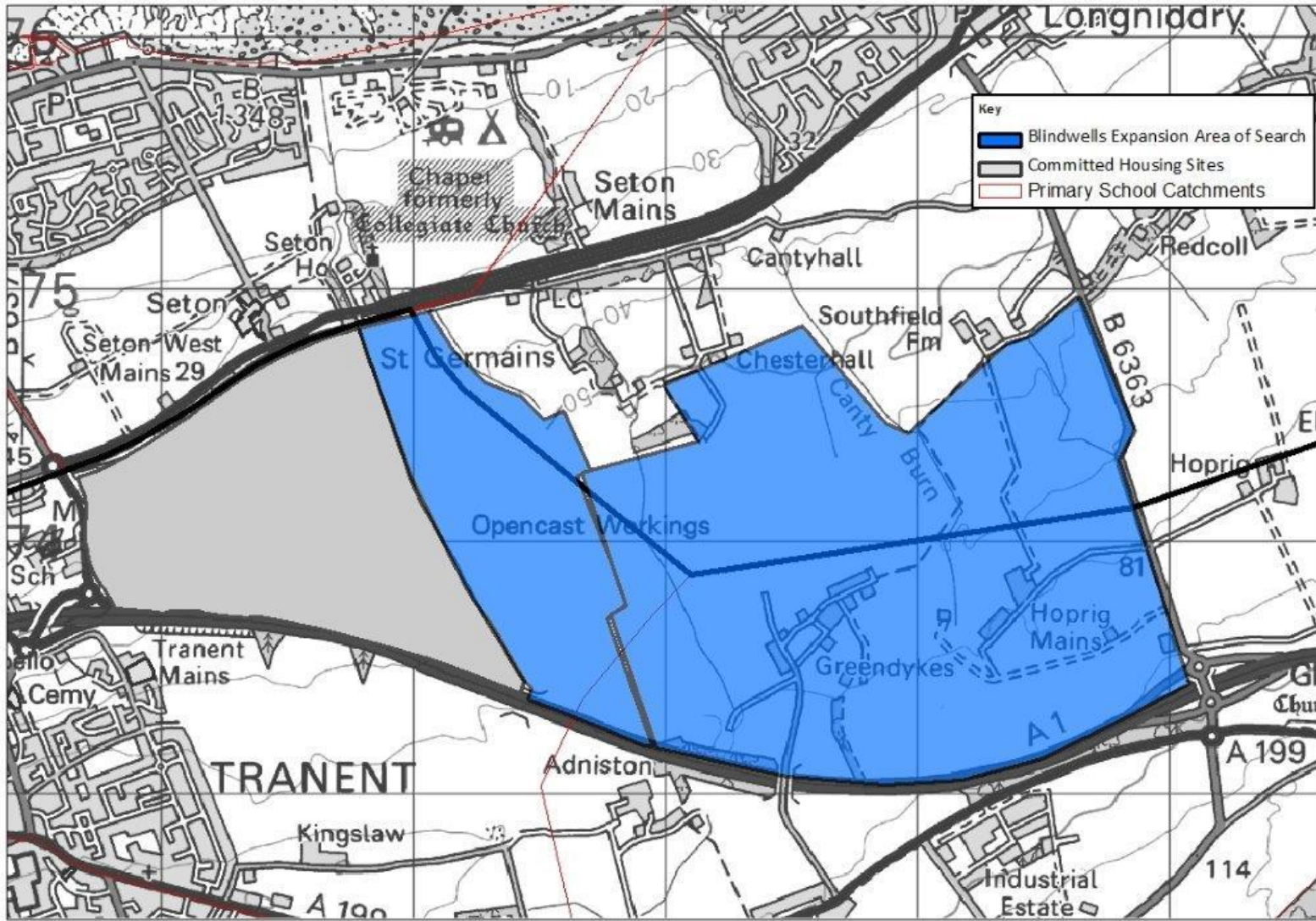
- 6.99** However, the SDP's approach to any expansion of Blindwells is that this is predicated on comprehensive solutions being found that will deliver the entire new settlement - i.e. a single new settlement, not a sequence of separate ones – and that these solutions are to be confirmed before any additional land there can be allocated. Specifically, this is to avoid any need for the LDP to support any sub-optimal solution(s) for the delivery of the new settlement, even if more housing completions might be achieved earlier than with a continued west to east phasing of development. This is why the SDP 'signposts' a vision for a larger new settlement at Blindwells, but does not require this to be delivered.
- 6.100** The implication of not being able to achieve early house completions at Blindwells will likely be a need to identify greenfield land for new housing at existing settlements. Without a clear and agreed strategy for how a single larger settlement could be delivered at Blindwells, the current SDP would expect the expansion of existing settlements to be prioritised over a separate stand alone development to the east of the current Blindwells allocation. The possible policy approaches to expanding Blindwells are discussed in the following sub-sections.
- 6.101** In terms of the provision of education capacity for the new settlement, the options for the provision of secondary education capacity for Blindwells are as follows:
- a. A new secondary school is provided on-site for the first occupancy of dwellings at the site; or
 - b. Preston Lodge High School is used to accommodate the pupils from the current allocation, and if the settlement grows beyond the current allocation a new secondary school would be provided in association with any subsequent phases of expansion;
 - c. If the settlement does not expand beyond the current allocation, and if b) is followed, then a new secondary school may not be required at this site.
- 6.102** In terms of the provision of primary education capacity, up to 4 new primary schools may be needed at Blindwells depending on if and how the new settlement grows. The options for the provision of primary education capacity for Blindwells are as follows:
- a. A new primary school is provided on-site for the first occupancy of dwellings at the site;

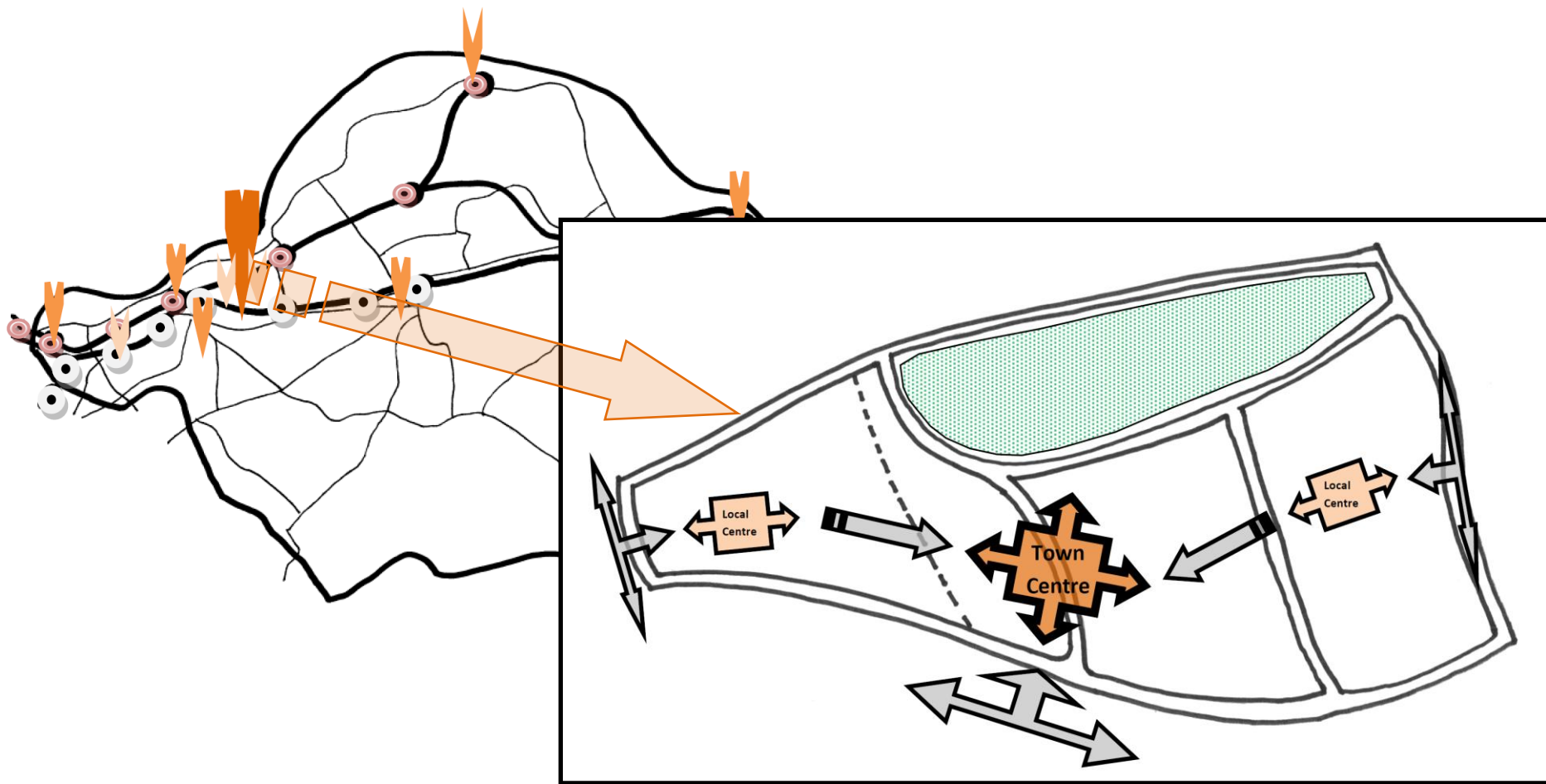
- b. Cockenzie Primary School could be used to provide temporary primary education solution before a new primary school is provided at Blindwells once a viable pupil roll has developed. Once the primary school is in place at the site:
 - i) If 1,600 homes are to be delivered at Blindwells 1 new primary would be needed. It should feed Preston Lodge High School. This would become the final primary solution for Blindwells new settlement;
 - ii) If Blindwells is to grow beyond 1,600 homes, perhaps to 3,500 - 6,000+ homes in to the much longer term, then 2 – 4 new primary schools may be needed to support the relevant amount of housing development. A new secondary school cluster at Blindwells may be created for this.

6.103 If Blindwells were to grow beyond 1,600 homes at this stage the preferred spatial strategy to support the delivery of new education facilities at the site would be to follow the existing (and currently required) west to east phasing of the development:

Phase 1: Utilise the approach set out at (a or b) above for the first 1,600 homes; then

Phase 2/3: for the second and any third phase of expansion provide a new secondary school and primary school(s) in the middle of the Blindwells Development Area, and if required another primary school to the east.



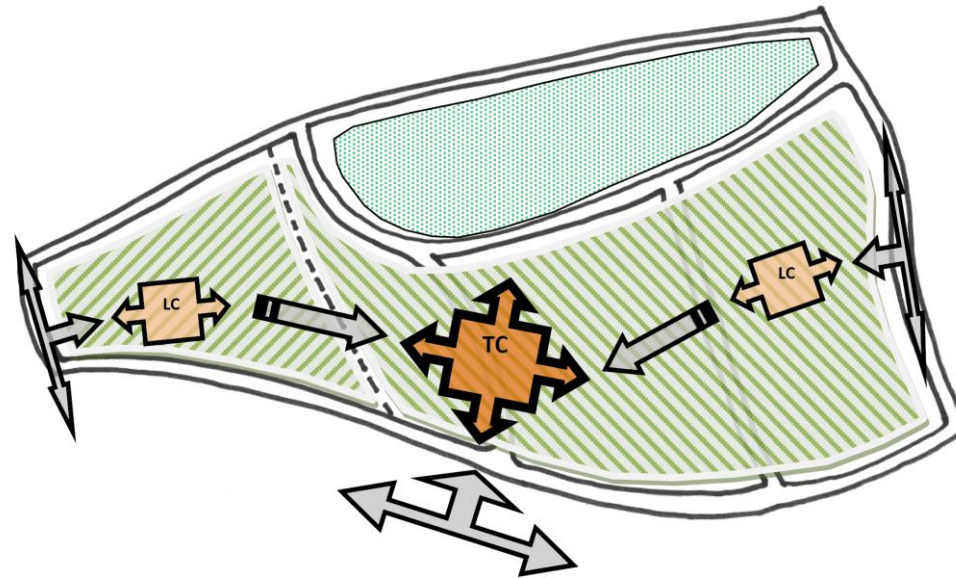


Blindwells - Potential Policy Approaches for the LDP

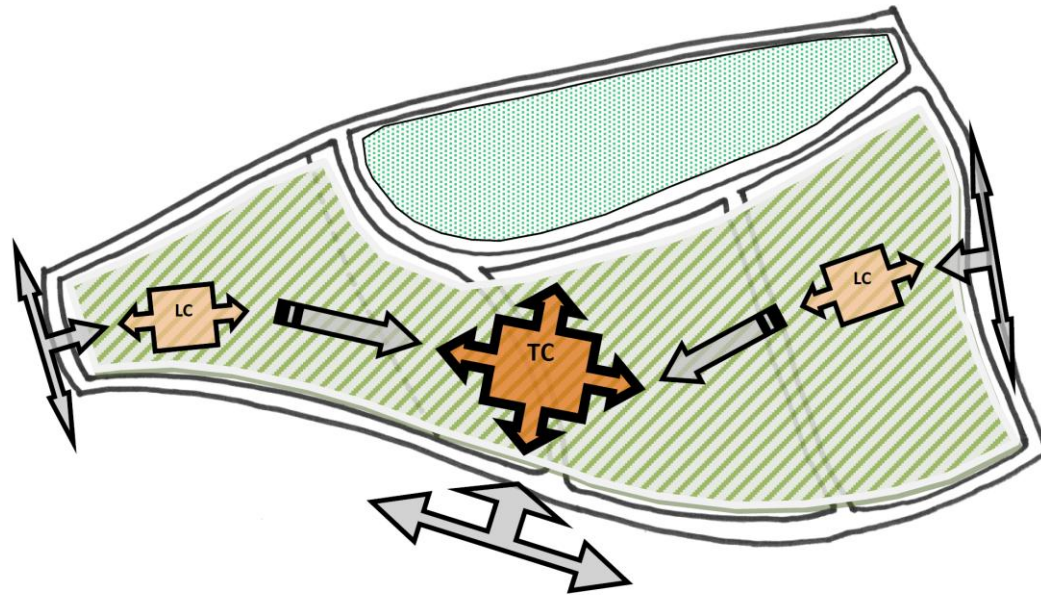
A comprehensive solution is found for the LDP

6.104 The current local plan proposal and its associated Development Framework require solutions to be found for the development of the existing allocated site which are not dependent on and would not prejudice a further expansion of the new settlement. To conform to the approved SDP, and to allow for the transition between the current Development Plan position and any new Development Plan position coming into force, **comprehensive solutions** for the development of a single larger new settlement at Blindwells may be found in the following two ways:

- a. If planning permission is approved for the area of the current local plan proposal prior to the adoption of the LDP, any proposal promoted by the LDP for any expansion of the new settlement beyond the current allocation must be able to complement and be compatible with the planning permission approved for the area of the current local plan proposal;



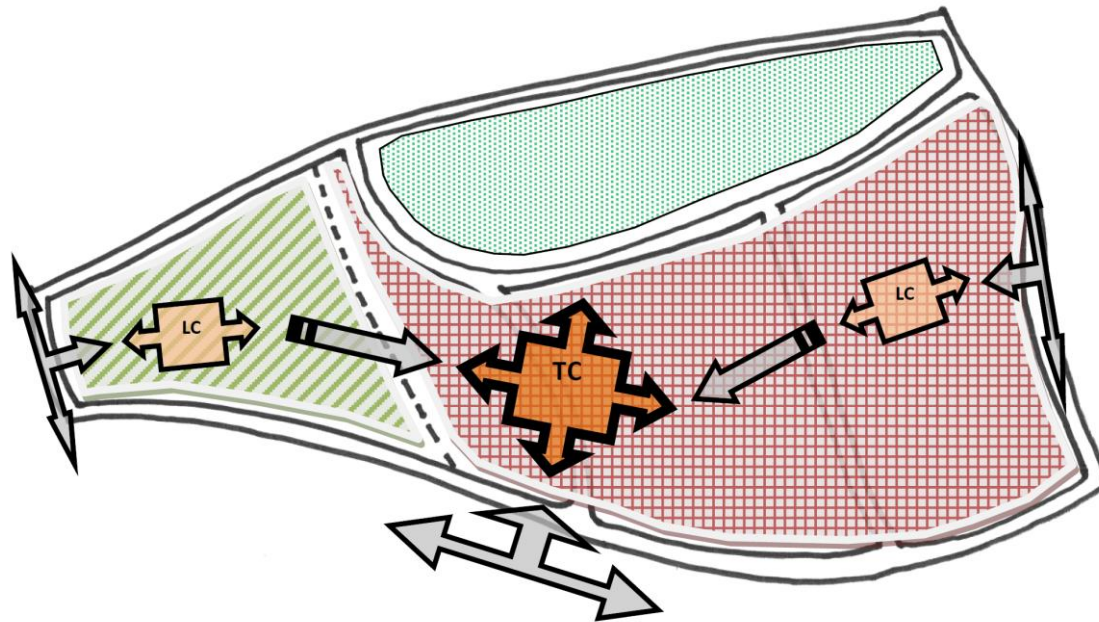
- b. If no planning permission exists for the area of the current local plan proposal at the point the LDP is adopted, a single proposal must be brought forward as a consolidated solution for all of the land which may be allocated as a Blindwells Development Area.



6.105 The current local plan would allow planning permission to be approved for the existing allocated site until the LDP is adopted. However, if no such permission exists at the time the LDP is adopted, the LDP will require a single comprehensive solution for all of the land allocated as the Blindwells Development Area. The development principles for the area of land subject to the current local plan proposal would be reviewed and the associated land included as part of any wider Blindwells Development Area to be allocated by the LDP.

A Comprehensive solution is not found for the LDP

6.106 If planning permission is approved for the land subject to the current local plan proposal before the LDP is adopted, but solutions are not specified by the LDP that would allow a complementary form of development to be delivered on any part of The Blindwells Expansion Area of Search, the LDP would safeguard all or part of that area of search so as not to prejudice any future expansion of the new settlement.

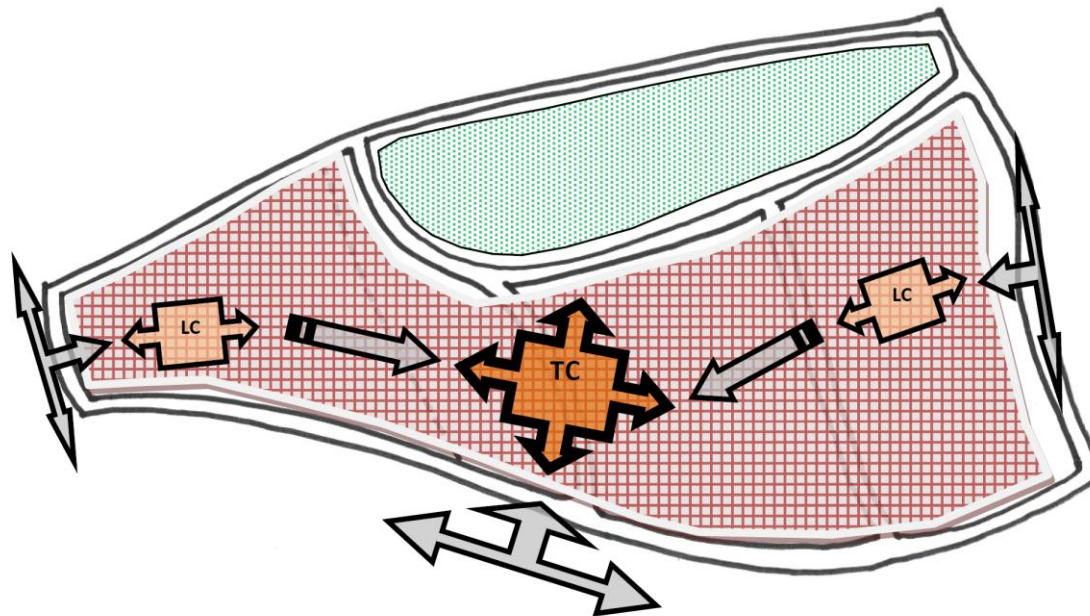


6.107 Such a safeguard would be required in order to prevent development taking place that would compromise the ability to expand the new settlement and also to allow SESplan to take a view on the extent to which any expansion of Blindwells should feature as part of any future SDP spatial strategy. An important consideration for SESplan will be the planning status of the land subject to the current local plan proposal and if an expansion of Blindwells continues to be a potential opportunity – i.e. if comprehensive and deliverable solutions have been found.

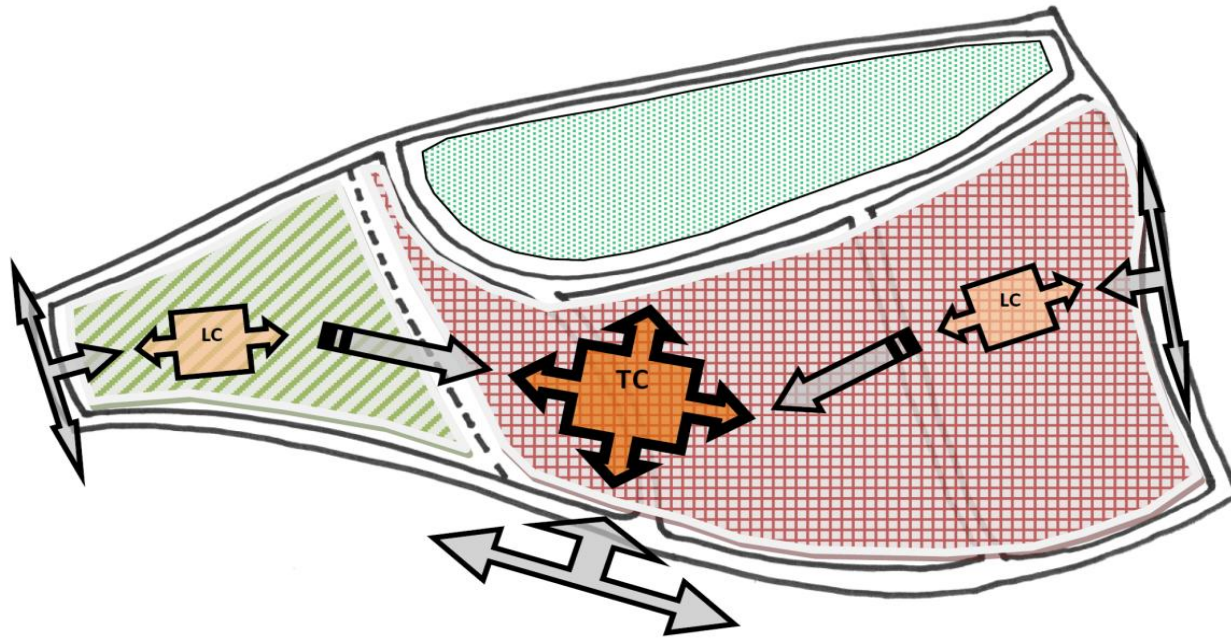
Finding a comprehensive solution whilst the LDP is operative

6.108 If a comprehensive solution cannot be specified by the LDP, it could continue to seek one whilst the LDP is operative. The LDP would be used to influence how that solution is found and confirmed as policy by the Council. Supplementary Guidance could be prepared and adopted by the Council after the LDP is adopted for this purpose. It would reflect whether or not planning permission has or has not been approved for the current local plan allocation. Development at Blindwells does not need to commence until post 2019 – i.e. after the review of the emerging LDP – so there is time for such Supplementary Guidance to be prepared. In these circumstances there are two approaches which may be followed:

1. if planning permission is not approved for the current allocation before the LDP is adopted, a Blindwells Development Area will be safeguarded for the development of the new settlement:

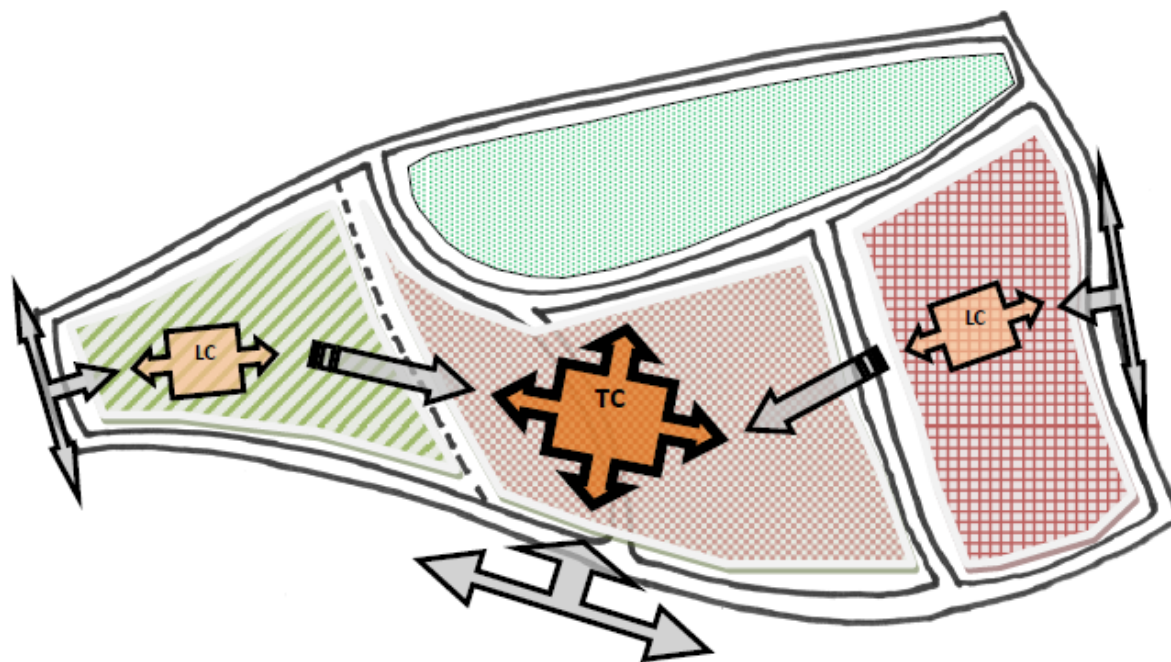


- if planning permission for the current allocation is approved before the LDP is adopted, the safeguard would relate to a Blindwells Expansion Area of Search.

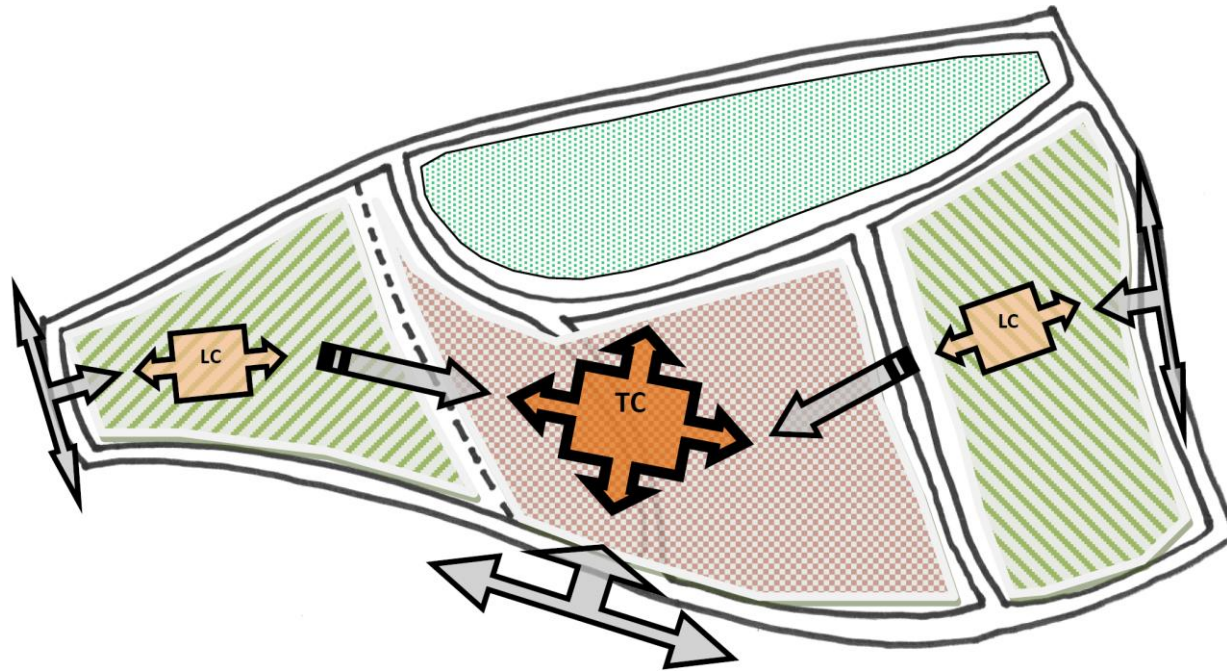


The safeguard could be lifted, potentially in phases, if and when Supplementary Guidance for the expansion of the new settlement is adopted by the Council. The sequence in which the safeguard could be lifted would depend on the nature of the solutions that are found in the preparation of the Supplementary Guidance – e.g.

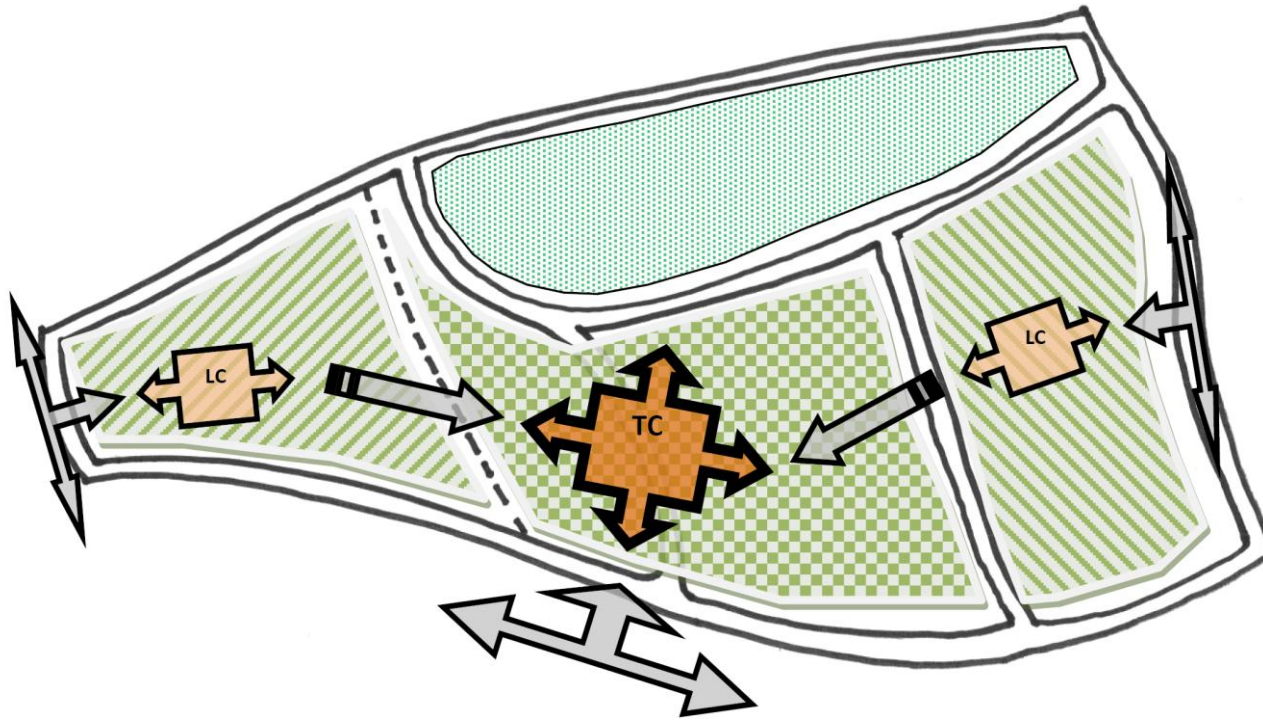
The safeguard could be lifted sequentially from west to east as a continuation of the current phasing approach, with each phase complementing and being compatible with the preceding phase:



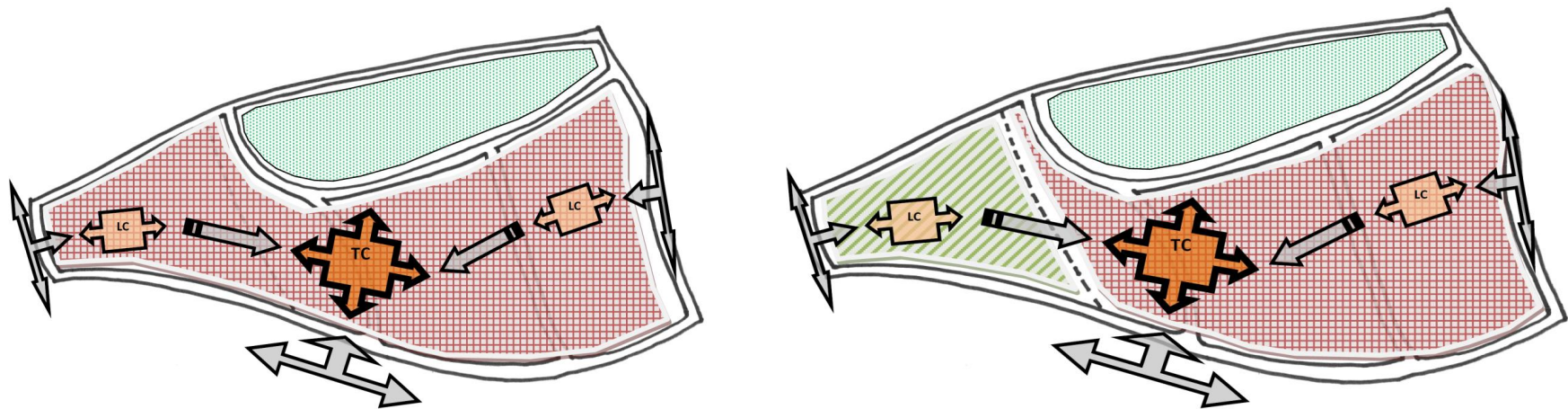
the safeguard could be lifted from both ends of the site, **if it is proven and agreed that the area in middle can and will be developed as part of a single comprehensive solution** but matters such as provision of access might delay this and other infrastructure issues can be satisfactorily resolved, including the provision of education capacity and facilities:



the safeguard could be lifted from all areas at once if matters such as the provision of access and other infrastructure issues could be satisfactorily resolved to allow for the early development of all areas simultaneously as part of a single comprehensive solution:



6.109 However, if the LDP and / or Supplementary Guidance can not specify how Blindwells could be expanded, a safeguard will be required over all (or over part of the land if planning permission is approved for the current allocation before the LDP is adopted) to manage an appropriate phasing of development and / or to manage an appropriate outcome in relation to Blindwells through time and the development plan review process. In these circumstances the need for a safeguard will be reviewed with the LDP.



6.110 If comprehensive solutions are not found SESplan will review the contribution that this location is expected to make to the SDP spatial strategy. For the clear avoidance of doubt, if comprehensive solutions are not found in a reasonable timeframe, SESplan may take the view that the Blindwells concept need be deleted either in whole or part from the SDP's spatial strategy. The preference is therefore to find comprehensive solutions for a larger Blindwells new settlement in the preparation of the LDP.

Table 25: Blindwells New Settlement

Preferred Approach

If comprehensive solutions for the development of the entire new settlement **are** specified in principle by the LDP, including the means of and timescales for remediating ground conditions, the scale and nature of and delivery mechanisms for community facilities and all other infrastructure, including the means of access to and across the entire Blindwells Development Area, and the appropriate phasing of that provision for the entire new settlement, the following approach is preferred:

- 1) The Council will require the approach to be delivered through a single planning application accompanied by a single masterplan framework and a single Section 75 agreement that relates to all of the land identified as the Blindwells Development Area, unless planning permission is approved for the area of the current local plan proposal prior to the adoption of the LDP;
- 2) If planning permission is approved for the area of the current local plan proposal prior to the adoption of the LDP, the Council will require a single planning application accompanied by a single masterplan framework and a single Section 75 legal agreement in respect of any identified Blindwells Expansion Area. Any proposal for the expansion area must complement any planning permission approved for the area of current local plan proposal. If both proposals are taken together they must be compatible with one another and deliver a comprehensive solution that would allow the phased delivery of the entire new settlement and its supporting infrastructure and community facilities in an appropriate way. This may require a west to east phasing of development;
- 3) There will be a land available for 1,600 dwellings at Blindwells up to 2032, but the possibility of land becoming available for more dwellings before 2032 will only be allowed if appropriate solutions are found;
- 4) If a new interchange with the A1(T) can be delivered, or the existing underpass of the A1(T) to the south can be used to provide access to the potential development area, a three way phasing strategy may be possible (from the west, centre and east), but if any of these accesses solutions are not deliverable an appropriate phasing strategy from the east and / or the west would be promoted;
- 5) A higher order town centre or a town centre may be promoted in the middle of the Blindwells Development Area (e.g. to the east of the land subject to the current local plan proposal) as well as potentially two local centres with one to the west and one to the east; however, this will be subject to these centres serving appropriate catchment areas to be specified by the Council and the ability to access all new centres satisfactorily from all of their intended catchment areas, including via the trunk road and local road network, as well as via public transport, walking and cycling routes. The phasing for the delivery of all centres, including any higher order one, will be directly linked to the phasing for the provision of infrastructure, including access to and across the entire new settlement. The scale of any higher order town centre is likely to be directly linked to the ability to deliver a new trunk road interchange or other access solution which would offer a suitable connection between the new settlement and existing settlements, particularly those nearby to south of the A1(T), including via public transport and active travel routes;
- 6) The role of the new settlement in providing any strategic employment opportunities as part of the review of the employment land supply will be specified once this review has concluded, and once the timescale for development at Blindwells is confirmed. Any new employment land to be identified at Blindwells, where it will be located and how it will be serviced on a phased basis with the development of the other land uses, including housing, should also be specified by the LDP;
- 7) The solutions will be detailed in Supplementary Guidance to be prepared by the Council working collaboratively with all relevant landowners in

| | |
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| | <p>consultation with other relevant parties. The intention would be to publish this Supplementary Guidance alongside the Proposed LDP. Once the Supplementary Guidance is approved by the Council it would provide the basis against which a single planning application accompanied by a single masterplan framework and a single Section 75 legal agreement would be prepared, either for the entire Blindwells Development Area or, if planning permission is approved for the current local plan proposal before the LDP is adopted, for any Blindwells Expansion Area.</p> <p>Although a single application, masterplan and legal agreement for the entire new settlement is the preference, this approach allows the current local plan proposal to be developed under any associated planning permission if it is approved prior to adoption of the LDP. This approach would prevent more than a single new settlement being developed at Blindwells. It would also ensure that open countryside is not developed before previously developed land unless this is a justified part of a comprehensive solution that would ensure delivery of a single new settlement into the longer term as intended. The solutions that will deliver the entire new settlement will be specified in principle by the LDP as will an appropriate phasing of development, but these solutions would be detailed in Supplementary Guidance. This approach may allow more land to become available before 2032 if the solutions and phasing for the development area specified by the LDP and any Supplementary Guidance approved by the Council allow for this.</p> |
| <p>Reasonable Alternative 1</p> | <p>If comprehensive solutions for the development of the entire new settlement are not specified in principle by the LDP and planning permission has been approved for the area of the current local plan proposal, the following approach is a reasonable alternative:</p> <ul style="list-style-type: none"> • A Blindwells Expansion Area of Search will be safeguarded for a potential expansion of the new settlement; • The Council will continue to seek comprehensive solutions during the operation of the LDP that will deliver an expansion of the new settlement, including the means of and timescales for remediating ground conditions, the scale and nature of and delivery mechanisms for community services and facilities and all other infrastructure, including the means of access to and across the new settlement and the appropriate phasing of that provision for the entire new settlement, unless and until an SDP promotes an alternative approach; • If and when solutions are found they will be specified in Supplementary Guidance to be prepared by the Council working collaboratively with all relevant landowners and in consultation with the public and other relevant parties whilst the LDP is operative. Once adopted by the Council, the Supplementary Guidance would provide the basis against which a single planning application accompanied by a single masterplan framework and Section 75 agreement would be prepared for any Blindwells Expansion Area. • For the avoidance of doubt, any approval by Scottish Ministers of the Supplementary Guidance together with its adoption by the Council would have the effect of confirming the allocation within which an expanded Blindwells may be developed; • The LDP will continue to prioritise a west to east phasing of development; however, it may allow for an alternative phasing of development if and when comprehensive solutions are found in the preparation of Supplementary Guidance that would deliver the entire new settlement into the longer term with an appropriate alternative phasing of development; • The approach to other matters will be the same as set out in points 2 – 6 of the preferred approach, as relevant to this approach. <p>Although a single application, masterplan and legal agreement for the entire new settlement is the preference, this approach allows the current local plan</p> |

| | |
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| | <p>proposal to be developed under any associated planning permission if it is approved prior to the adoption of the LDP. It would also prevent more than a single new settlement being developed at Blindwells and open countryside from being used separately from the previously developed land. If solutions are found for the phased expansion of Blindwells at different times, this approach allows the settlement to be expanded on an appropriate phased basis using Supplementary Guidance to direct the approach. It may also allow more housing land to become available before 2032 because the opportunity remains to find comprehensive solutions to develop a larger new settlement faster with different areas being developed simultaneously. However, if appropriate solutions are not found, it also ensures that SESplan has the option to review the contribution that Blindwells may be able to make to the longer term settlement strategy.</p> |
| <p>Reasonable Alternative 2</p> | <p>If comprehensive solutions for the development of the entire new settlement are not specified in principle by the LDP, and planning permission has not been approved for the area of the current local plan proposal prior to the adoption of the LDP, the following is another reasonable alternative:</p> <ul style="list-style-type: none"> • A Blindwells Development Area of Search would be safeguarded for the development of a new settlement. This would include and be larger than the area of the current local plan proposal, which would also be reviewed; • The Council would continue to seek comprehensive solutions during the operation of the LDP that will deliver a single new settlement within the safeguarded Blindwells Development Area of Search, including the means of and timescales for remediating ground conditions, the scale and nature of and delivery mechanisms for community services and facilities and all other infrastructure, including the means of access to and across the entire Blindwells Development Area of Search, and the appropriate phasing of that provision for the entire new settlement, unless and until an SDP promotes an alternative approach; • Once found, solutions will be specified in principle in a review of the Local Development Plan and / or detailed in Supplementary Guidance to be prepared by the Council working collaboratively with all relevant landowners and in consultation with the public and other relevant parties. Once approved by the Council, the Supplementary Guidance would provide the basis against which a single planning application accompanied by a single masterplan framework and Section 75 agreement would be prepared for the entire new settlement; • For the avoidance of doubt, any Supplementary Guidance would need to be approved by Scottish Ministers and adopted by the Council; • The approach to other matters will be the same as set out in points 4 - 6 of the preferred approach as relevant to this approach. <p>Whilst allowing work on comprehensive solutions to continue during the operational phase of the LDP a single planning application, masterplan framework and Section 75 legal agreement would be required for the entire new settlement under this approach. It would prevent more than a single new settlement being developed at Blindwells and open countryside from being used separately from the previously developed land. It would allow at least 10 years to deliver 1600 homes between 2019 - 2032 if solutions are found while the LDP is operative. Since the review of the LDP may be needed to confirm any revised allocation here this may prevent completions from coming forward at Blindwells before 2019. If the required solutions are not found, this approach also ensures that SESplan has the option to review the contribution that Blindwells may be expected to make to the settlement strategy, including if the concept is retained.</p> |

Mitigation

6.111 Mitigation requirements will include:

1. Establishing new, long term settlement boundaries, taking in to account any new Countryside Around Town designation;
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, and the safeguarding of land for a new rail halt together with other measures intended to reduce travel by private car;
5. 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;
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 masterplan 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: Blindwells

The SDP confirms continued commitment to Blindwells as a significant development opportunity. The current allocation could deliver circa **1,600 homes and 10ha of employment land** in the period to 2024 and beyond. However, the SDP does not expect dwelling completions from Blindwells until 2019. A west to east phasing of development for the current allocation is required. In regional terms the Blindwells area is highly accessible, including by public transport, and there are opportunities to improve this. The cumulative impact of development on the transport network, including at Old Craighall, is an important issue that requires to be resolved. The area is in high demand as a place to live and offers the potential for job creation. Strategic water and drainage capacity exists to serve the current allocation. However, the current education solution for Blindwells may need to be reviewed, including the Blindwells education cluster. An alternative education solution for the current allocation may be promoted. This may involve 1) utilising available education capacity at Cockenzie Primary School to allow for the construction of permanent primary school facilities at Blindwells, and 2) by providing additional capacity at Preston Lodge High School to secure a permanent secondary education solution for the current allocation. This would be subject to school catchment reviews. The SDP also recognises that the Blindwells area may have further significant growth potential and that the current local plan proposal may need to be reviewed. The 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 housing land requirements up to 2032 and beyond. **Into the much longer term it may be that Blindwells could grow in to a settlement of circa 6,000+ homes and provide significant employment opportunities.** If comprehensive solutions are found for a larger new settlement, this would allow the LDP to identify the area of land within which such a development may take place as well as confirm the scale of the new settlement. A confirmed ability to expand Blindwells would provide a number of important opportunities for East Lothian. One of these would be for a new town centre to be provided at Blindwells of a size that may also serve surrounding communities. This could help regenerate nearby settlements whose economic base has declined and which have limited scope for further expansion. Located in the highly accessible western part of East Lothian, where most of the area's population is, Blindwells is also a logical location to promote employment and inward investment opportunities. Provision of new jobs, community services and potentially further education facilities would improve the availability and accessibility of these amenities to East Lothian's communities. This could help minimise the need to travel and travel distances as well as related CO₂ emissions. However, without a clear and agreed strategy for how a single larger new settlement could be delivered here, including the willingness of all relevant landowners to contribute to the solution, the SDP expects the expansion of existing settlements to be prioritised over a separate stand alone development to the east of the current Blindwells allocation. Comprehensive solutions must be confirmed that will deliver a single new settlement at Blindwells before any further land may be allocated there for development. If such solutions are not found, the contribution that Blindwells may be expected to make to the development strategy will be reviewed, including if the concept should be retained in whole or part or not at all.

Question 17: Blindwells New Settlement

Do you support the preferred approach promoted in relation to the current allocation for Blindwells new settlement (1,600 houses and 10ha of employment land)? If you do not support it please indicate what alternative you would suggest and explain why?

Do you support the preferred approach promoted in relation to a potential expansion of Blindwells new settlement (beyond the current allocation)? If you do not support it please indicate what alternative you would suggest and explain why?

Potential options have been identified for how education capacity might be provided for the new settlement through time. How do you think those options could be funded and delivered, and where should the facilities be located?

Delivery mechanisms will be required to enable the development of the new settlement. What do you think the options for this are?

Do you have any other comments in relation to the proposals for Blindwells new settlement?

Cluster Analysis Summary - Housing Land Requirements and Housing Land Supply

6.112 SPP, the SDP and its associated SG on Housing Land set out how the SDP housing requirement is to be met and the basis of the calculation to demonstrate this. Accordingly, Table 26 is based on the tables in the cluster analysis above that set out the rate of housing development currently anticipated through time from the sites that are preferred at this stage: it draws this information together for East Lothian as a whole. Table 26 demonstrates that the current preferred sites, in combination with the established housing land supply and a small allowance for ‘windfall’ housing development, could satisfy the SDPs housing requirements up to 2019 and 2019 – 2024, and that an effective 5 year housing land supply could be maintained at all times when the LDP is operative. Overall, a 12% generosity factor would also exist in the housing land supply during the LDP period.

Table 26: Housing Land Requirements and Housing Land Supply

| PLANNING PERIODS | 2009 - 19 | 2019 - 24 | TOTAL TO 2024 | 2024 -32 ⁽⁵⁾ | Beyond 2032 | TOTAL SUPPLY |
|--|--------------|--------------|---------------|-------------------------|-------------|---------------|
| SDP Housing Requirement to 2024 | 6,250 | 3,800 | 10,050 | 3,820 | 0 | 13,870 |
| Dwelling Completions 2009 – 13 | 1,321 | 0 | 1,321 | 0 | 0 | 1,321 |
| Contribution from Established Land Supply ⁽¹⁾ | 2,939 | 1,793 | 4,732 | 0 | 0 | 4,732 |
| Contribution from Preferred MIR Sites | 2,126 | 2,416 | 4,542 | 1,198 | 0 | 5,740 |
| Contribution from Future Windfall Sites ⁽²⁾ | 220 | 110 | 330 | 110 | 0 | 440 |
| Loss of Supply to Dwelling Demolitions ⁽³⁾ | 0 | 0 | 0 | 0 | 0 | 0 |
| Sub-Total Housing Land Supply | 6,606 | 4,319 | 10,925 | 1,308 | 0 | 12,233 |
| <i>Contribution from Blindwells</i> | 0 | 363 | 363 | 801 | 436 | 1,600 |
| Grand Total Housing Land Supply | 6,606 | 4,682 | 11,288 | 2,109 | 436 | 13,833 |
| <i>Shortfall / Surplus of Housing Land⁽⁴⁾</i> | -356 | -882 | -1,238 | | | |
| <i>% generosity in land supply to 2024</i> | | | 12 | | | |

⁽¹⁾ Includes a contribution of 80 dwellings from small sites (less than 5 units) programmed 2013–18 as per Agreed 2013 Housing Land Audit; ⁽²⁾ SESplan’s windfall assumption for East Lothian has been used at this stage, but this may be reviewed for the Proposed LDP: the annual average windfall contribution for East Lothian 2008 – 2013 was higher; ⁽³⁾ SESplan’s demolitions assumption for East Lothian has been used at this stage, but this may be reviewed for the Proposed LDP; ⁽⁴⁾ A negative number indicates a surplus of housing land against the housing requirements; ⁽⁵⁾ For the avoidance of doubt, the figure for the period 2024 – 32 is not part of the SDPs housing requirement, but is an estimate of need and demand for housing during that period from the SESplan HoNDA.

Question 18: Housing Land Requirements and Housing Land Supply

Does Table 26 set out the proper way of calculating how the SDP housing requirement is to be met? Please explain your answer.

7 Main Policy Issues

Introduction

- 7.1 The LDP and / or Supplementary Guidance must set a policy framework against which all applications for planning permission, whether on allocated sites or not, will be assessed. The current local plan has a range of planning policies covering matters such a biodiversity and natural heritage, the built and historic environment, retailing, minerals, energy and the planning requirements on development sites. These policies have been reviewed internally and in consultation with others, including SNH, SEPA and Historic Scotland for continued relevance and to establish if any change to them may be justified, taking account of updated national and regional planning strategy and policy (NPF3, SPP and SESplan).
- 7.2 The review has found that the principles behind the majority of the current local plan policies remain relevant. They have been used in assessing and determining planning applications and have proved to be robust. For example, there are very few instances of policies being overturned at planning appeal. However, that is not to say that there is no need to review them for continued relevance and robustness. Changes in national and regional planning strategy and policy indicate that in some circumstances there may be some scope for the MIR to consult on potential amendments. Examples of this include consideration of the policy approach to developer contributions, affordable housing, energy, minerals and waste.
- 7.3 The discussion on potential changes to the policy approach is separated in to potential major changes and minor changes. Only potential major changes are discussed in the MIR. The Monitoring Statement discusses the potential minor changes, which are also listed at Appendix 6 but with limited discussion. The policy review in the Monitoring Statement sets out the policy issues and the approach the Council would like to follow, and where there may be scope for minor change and to include policies in Supplementary Guidance. As part of the planning system reforms LDPs are to focus on vision, spatial strategy and on related overarching key policies and proposals. Consequently, much detailed policy material can be contained in Supplementary Guidance. For any supplementary guidance to form part of the Development Plan there should be a clear link to it in the LDP. There is also a requirement for public consultation on Supplementary Guidance and Scottish Ministers have a role to check it before it can be adopted.
- 7.4 Notwithstanding this, the intention is to include key planning policies and proposals that relate to the core spatial strategy in the LDP. These would include proposals for new housing and employment land as well as others that may be related to the core spatial strategy, as well as policies such as those on green belt and development in the countryside, and on flooding, built and natural heritage, retailing, minerals and waste etc. Other detailed policies that are aimed more at Development Management, such as site layout and design, and those not directly related to the core spatial strategy, may be taken forward through Supplementary Guidance.

Developer Contributions

- 7.5 Securing funding and delivery mechanisms for infrastructure provision is at the core of how development can be enabled, particularly during challenging economic conditions, and is a main issue for the LDP. The SDP and its Action Programme set out the items of strategic infrastructure required to support the SDP. It also requires LDPs to identify the full range of supporting infrastructure requirements, including those for which developer contributions will be sought³⁹. The land needed to deliver these is to be safeguarded where appropriate.
- 7.6 The SDP suggests that Supplementary Guidance should be prepared alongside the LDP with standard charges and formulae⁴⁰ set out in a way that assists applicants. Funding is also to be sought from infrastructure and service providers and innovative delivery mechanisms are to be considered. Where known at this stage many of the likely infrastructure issues associated with delivering the SDP's development requirements for the area are set out above. Once the Council has set out the strategy and sites in its Proposed LDP it will also set out in its draft Action Programme the associated infrastructure requirements. However, there are limitations on the items for which developer contributions can be justified as well as how contributions can be gathered and / or spent to provide infrastructure when needed to help enable development.
- 7.7 Scottish Government Circular 3/2012: Planning Obligations and Good Neighbour Agreements must be complied with in order to seek developer contributions. Section 75 of the Town & Country Planning (Scotland) Act 1997 (as amended) allows planning obligations to be entered into to secure contributions by registering the obligation against the land – e.g. to bind subsequent owners. The Local Government (Scotland) Act 1973 (s69), The Countryside (Scotland) Act 1967 and The Roads (Scotland) Act 1984 (s48) allow upfront payment to be made by applicants.
- 7.8 Circular 3/2012 seeks to ensure that applicants are not required to provide any more mitigation than needed to address the impact of their development and to make it acceptable in planning terms. A cumulative assessment of impact and apportionment of associated mitigation / costs should be followed. Applicants cannot be expected to resolve existing deficiencies in provision. An important principle in this is that the mitigation of impacts generated by development proposals should not be met by the authority; rather, mitigation is to be funded proportionally by the developments which generate the impact, so long as this is justified based on the best information available at the time. However, a developer contribution regime cannot extend to include long term revenue impacts as this is a matter for the service and infrastructure providers concerned.

³⁹ SESplan SDP Policies 8 & 9 and paragraphs 118 – 123, and SESplan SDP Action Programme.

⁴⁰ SESplan SDP paragraph 123

- 7.9 Whilst the Development Plan process is to focus on providing early clarity on the nature of any interventions, as described above these can only be clarified once the spatial strategy is finalised – e.g. at Proposed Plan stage. Currently, it is also not the case that costs can be detailed for all infrastructure projects during plan preparation. This is because circumstances outwith the control of the relevant authority can change though time, and this should be monitored when the plan is operative. For example, the number of dwellings and / or amount of commercial floor space anticipated in the area may change as might the overall amount and rate of development. Such variables can influence demand projections for transport and education capacity as well as the associated design solutions for mitigation and associated cost apportionment. These factors can also influence when additional infrastructure capacity may be required.
- 7.10 Managing and monitoring the intake and spending of developer contributions to ensure projects can be delivered at the right time is complex, time consuming and resource intensive. The uncertainty makes administering a developer contribution regime as part of any planning, capital planning, asset management and delivery strategy very challenging. In practice, current arrangements do not work well as part of a streamlined planning process which is also to be focused on delivery.
- 7.11 Circular 3/2012 prefers that the assessment of a developments impact be based on the best information available at the time any planning application is made. Yet Policy 9 of the SDP may support the prior setting of contribution values / requirements, which would assist in providing early clarity on these matters for applicants as well as the Council. However, the need to strictly comply with the ‘tests’ in Circular 3/2012 may prevent such an alternative approach being followed. It may be that no significant changes can be made to current arrangements unless there are changes to the established practice of interpreting and applying Circular 3/2012 or if the Circular is reviewed.
- 7.12 It is not possible to seek developer contributions retrospectively towards capacity in infrastructure / facilities that are already in place. In most cases it may be that the front funding of infrastructure needed to enable development, subject to a mechanism to recover it from future applicants, is not currently an option for the Council. Yet there may be situations where agreement to spread the payment of contributions over the programme of a particular development may be accepted if the risks can be managed through the use of a planning obligation.
- 7.13 There is to be an emphasis on pre-application discussions and agreement between applicants and service and infrastructure providers. This is particularly true where there is a need to resolve complex issues such as the phasing and timing for new infrastructure on a site relative to the development of the site. Securing early clarity on this is important to the development appraisals as well as the planning authority’s performance.

Table 27: Developer Contributions

| | |
|-------------------------------|--|
| Preferred Approach | In relation to developer contributions the preferred approach is to continue with the current approach for all applications. A cumulative assessment would continue to be undertaken on a case by case basis as and when applications are made. |
| Reasonable Alternative | In relation to developer contributions an alternative approach is to explore setting a flat rate developer contribution, for example for a catchment area of specific facilities such as in relation to primary school and secondary school facilities. The flat rate would be reviewed annually and contribution values would be index linked. |

Question 19: Developer Contributions

In terms of approach to infrastructure and developer contributions 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?

Affordable Housing

Affordable Housing Quota

- 7.14 The approved SDP requires LDPs to set out an appropriate approach to the provision of affordable housing in their area, taking into account the local characteristics and the need for affordable housing⁴¹. SPP expects alignment between the Local Housing Strategy for the area and the approach to planning for housing in the Development Plan, including affordable housing.
- 7.15 SPP broadly defines affordable housing as housing of reasonable quality that is affordable to people on modest incomes⁴². The need for affordable housing should be met where possible in the market area where it arises. Development Plans are expected to address the need for affordable housing in their policies and proposals, if supported by a Housing Need and Demand Assessment (HoNDA).
- 7.16 Development Plans are also to be clear on the scale and distribution of the affordable housing requirements for the area, which may include any differences with respect to urban and rural locations, and what is expected of developers. SPP suggests that the level of contribution for affordable housing expected from a market site should generally be no more than 25% of the total number of units. Higher affordable housing requirements may be justified in relation to particular sites, for example where land is publically owned. In addition, as detailed under the section on Development in the Countryside above, a rural exceptions policy may be considered where this would help deliver solely affordable housing proposals for more remote rural settlements if no such opportunities exist within those settlements.
- 7.17 The SESplan HoNDA provides the analysis of housing need and demand in East Lothian and has been signed off by the Scottish Government as robust and credible. It identifies that there is an ongoing need for affordable housing in East Lothian and that this need continues to grow. The SESplan HoNDA provides evidence to show that between 2009 and 2032, 33% of the total housing supply is required to be provided as affordable housing. Furthermore, between years 2009 and 2019, the SESplan HoNDA demonstrates that the affordable housing requirement is more acute with a 41% annual requirement⁴³.

⁴¹ SESplan SDP paragraph 117

⁴² Scottish Planning Policy paragraph 126

⁴³ SES Plan Housing Technical Note November 2011 (Table 4 - Demand for New Houses Net of Turnover, page 9) <http://www.sesplan.gov.uk/assets/files/docs/proposed-plan/technical/Housing%20Technical%20Note%20Final.pdf>

7.18 This situation is likely to have got more challenging since publication of the HoNDA due to recent economic conditions and the difficulties people on modest incomes are experiencing when seeking to gain access to personal finance as well as save. This may also have an implication on the tenures of affordable housing that are needed, particularly in the short term.

Table 28: Affordable Housing – Affordable Housing Quota

| | |
|-------------------------------|--|
| Preferred Approach | The preferred approach to setting the affordable housing quota is to retain existing affordable housing quotas for all current local plan proposals and for all windfall proposals registered prior to the adoption of the LDP. The LDP will set the quota for serviced affordable housing land at 25% for new housing proposals. Delivery mechanisms must be agreed with the Council. The trigger at which the transfer of serviced land for affordable housing will be sought shall be for proposals consisting of 5 or more dwellings. |
| Reasonable Alternative | An alternative approach to setting the affordable housing quota is to set a 30% affordable housing quota for new housing proposals. In all other respect the same approach as the preferred one would be followed. |

Question 20: Affordable Housing Quota

In terms of approach to the affordable housing quota 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?

Affordable Housing Tenure Mix

- 7.19** Another issue for the LDP is whether the current 80-20% mix of social rented and LCHO accommodation respectively remains an appropriate tenure mix to seek to deliver on the serviced land secured under the affordable housing policy quota. SPP suggests that a wider range of housing tenures can be affordable, including homes for social and mid-market rent, shared ownership and shared equity models, and discount low cost housing for market sale, including self build plots and low cost housing without subsidy⁴⁴. There are a variety of delivery mechanisms for affordable housing provision.
- 7.20** Acceptance of a wider tenure mix may ensure housing, including affordable housing, can be delivered whilst also allowing infrastructure to be funded so sites can be developed. Policies and proposals are to take into account development viability, the strength of the housing market, the ability to deliver affordable housing in an appropriate way on small sites (including consideration of off-site provision and commuted sums) as well as the availability of public funding. However, where support is offered for a wide tenure mix, the availability of public funding should not inhibit the delivery of affordable housing.
- 7.21** Where the Development Plan specifies a quota for affordable housing as well as the approach to delivering it this allows developers and landowners to assess the cost implications of providing serviced land for affordable housing at an early stage. This means that the provision of affordable housing and other planning obligations should be taken into account in development appraisals and land valuations.

Table 29: Affordable Housing Tenure Mix

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|---------------------------|---|
| Preferred Approach | The preferred approach affordable housing tenure mix is to support a wide range of affordable housing tenure models, including social rent, shared ownership / shared equity, homes for midmarket and intermediate rent, and low cost housing for market sale and self build plots. The Council will specify in Supplementary Guidance to be prepared alongside the LDP the affordable housing tenures that will be supported. It will also specify targets for the range of affordable housing tenures. In all circumstances the mechanism for delivering affordable housing must be agreed with the Council, including the mix of affordable house types, sizes and tenures as well as the area of land needed to deliver them in an appropriate layout and form of development. These matters should be agreed during pre-application discussion so they are included in development appraisals before land is acquired, together with the need for any other planning obligations. |
|---------------------------|---|

⁴⁴ Scottish Planning Policy paragraph 126

**Reasonable
Alternative**

The alternative approach affordable housing tenure mix is to retain the existing 80%/20% tenure mix: 80% to be social rent and 20% to be other forms of affordable tenure, delivered on the serviced land secured through the quota. The Council will specify in Supplementary Guidance to be prepared alongside the LDP which affordable housing tenures will be supported and how the affordable housing tenures will be delivered.

Question 21: Affordable Housing Tenure Mix

In terms of approach to the mix of affordable housing tenures 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?

Energy, Including Renewable Energy

7.22 NPF3 and SPP are clear that planning must facilitate the transition to a low carbon economy by supporting means of energy generation which help reduce greenhouse gas emissions. The promotion of renewable energy developments should be included in the LDPs spatial strategy to guide such development to appropriate locations. A diverse range of renewable energy generation and the development of heat networks is to be supported. Development plans are to aim to achieve their areas full potential for production of electricity and heat from renewables, taking environmental, community and cumulative issues into account by helping to secure:

- 30% of overall energy demand from renewable sources by 2020;
- 11% of heat demand from renewable sources;
- the equivalent of 100% of electricity demand from renewable sources by 2020⁴⁵.

7.23 Proposals for non-renewable energy generation may also be acceptable where carbon capture and storage or other emissions reduction infrastructure is in place or committed within the developments timeline and good environmental standards are secured. NPF3 supports the continued use of the Cockerzie Power Station site for thermal energy generation and carbon capture and storage, and is identified as a National Development. The Scottish Government Energy Consents Units has issued planning permission for the works necessary to convert the power station from coal fired to gas fired. To supply fuel to the power station a new gas pipeline will be required, planning permission for which has also been approved. The LDP should offer support in principle to this National Development. NPF3 also notes that other energy related uses at and around this site may also be supported and that the coastline between Cockerzie and Torness has potential to become a renewable energy hub (as explained at paragraph 6.32 above). The intention is to reflect this in the LDP, and to review existing local plan policies and proposals as appropriate.

7.24 Torness nuclear power station continues to operate with two reactors, and a British Energy Consultation Zone exists around the facility. There are no confirmed plans or timescale for decommissioning the station and the current generating licence there extends to 2023. If Torness Power Station were to be decommissioned this would potentially bring significant implications for the planning process both in terms of the decommissioning itself, but also in terms of restoration, waste disposal and the after use of the site. As with Cockerzie Power Station, a significant attribute of the Torness site is its location at the mouth of the Forth, its access to the trunk road and nearby rail network, and its deep water harbouring facilities.

⁴⁵ Scottish Planning Policy paragraph 154

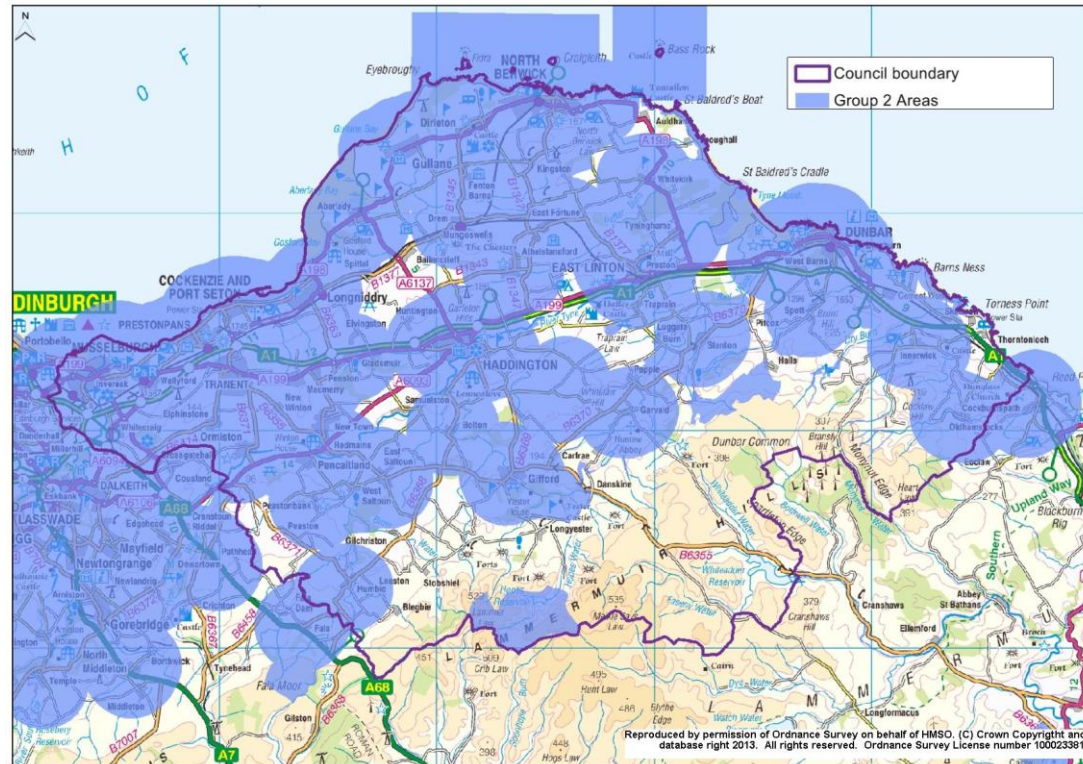
On Shore Wind Energy Proposals

- 7.25 On shore wind energy proposals are becoming an issue in the area, due to visual impact and landscape sensitivity, with cumulative impacts a related consideration. This is equally true for commercial scale operations as it is for individual or small groupings of turbines in the open countryside. The Council has recently approved supplementary guidance for both scales of wind energy proposals. They set a spatial framework for guiding such proposals to appropriate locations and for assessing related planning applications.
- 7.26 However, with the introduction of the revised SPP (June 2014) the method for producing spatial frameworks for wind farm development has changed. The method set out at Table 30 below must be followed. However, it is for planning authorities to determine what scale of wind energy proposals the spatial framework should cover. In addition to setting out criteria based policies for the assessment of wind energy proposals, the planning authority is also to set out its attitude on issues of cumulative impact in its area.

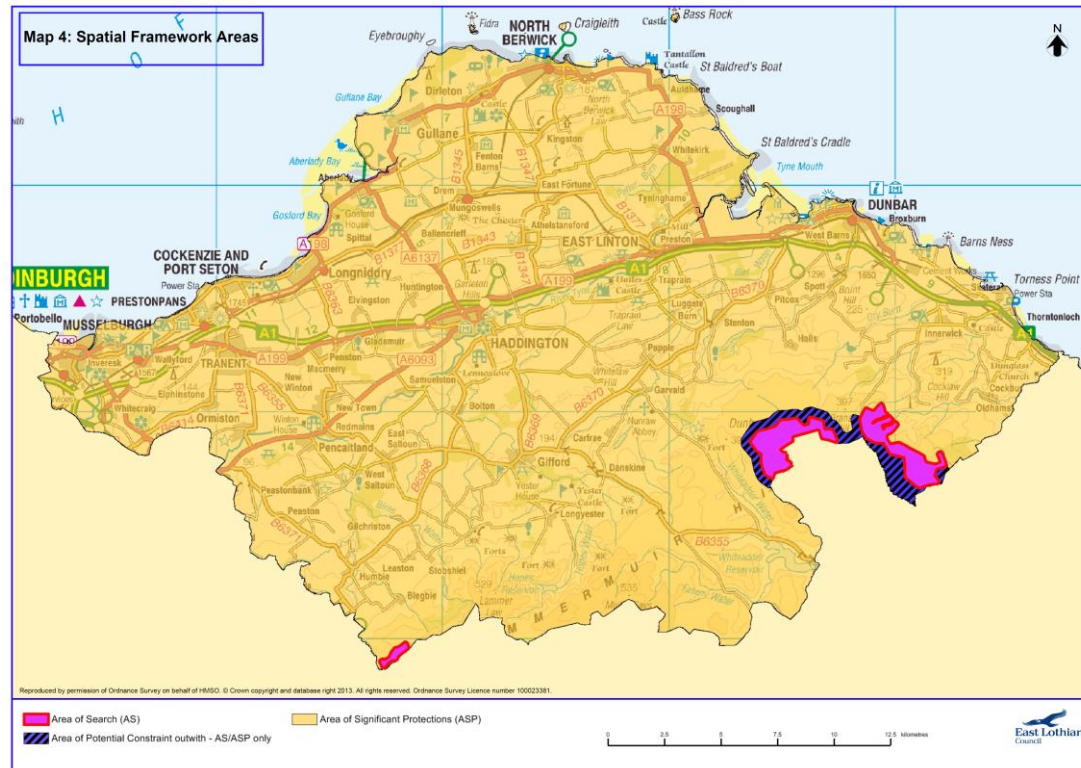
| Table 30: Scottish Government Spatial Framework for Wind Farm Development - Scottish Planning Policy 2014 | |
|--|--|
| Group | Criteria for inclusion in Group |
| Group 1: Areas where wind farms will not be acceptable | National Parks and National Scenic Areas |
| Group 2: Areas of Significant Protection; windfarms may be appropriate in some circumstances | <ul style="list-style-type: none"> • Certain designated sites: Natura 2000 sites; SSSI's, Battlefields and Designed Landscapes. World Heritage Sites, National Nature Reserves • SNH wild land • Carbon rich soils • Within 2km of a Local Plan settlement |
| Group 3: Areas with potential for windfarms where development is likely to be acceptable, subject to consideration against identified criteria* | Everywhere else |

**For example, criteria could include safeguards for individual properties and settlements not identified within the development plan; economic impacts, contribution to renewable energy targets and greenhouse gas emissions, cumulative impact, landscape and visual effects, impacts on the natural heritage and historic environment, road traffic and hydrology.*

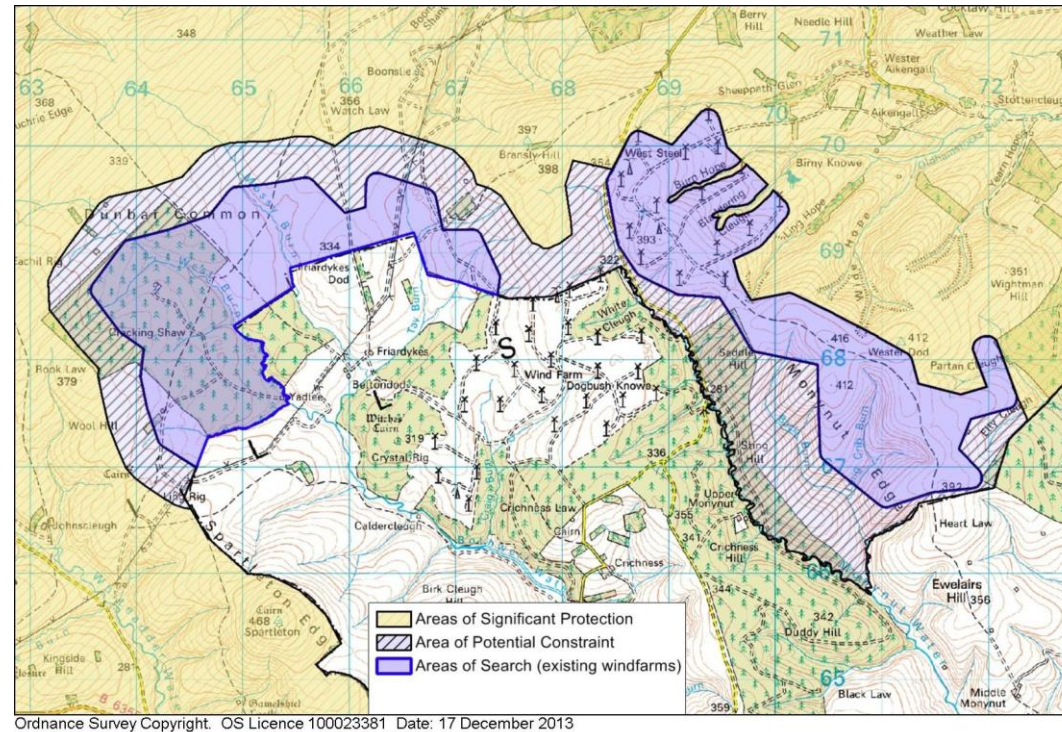
- 7.27 The plan below shows how the Scottish Governments spatial framework method applies to East Lothian. As there are no Group 1 areas in East Lothian, the plan shows the Group 2 areas, including a 2km separation distance around settlements identified in the current local plan. This plan therefore illustrates the Area of Significant Protection, consistent with SPP.



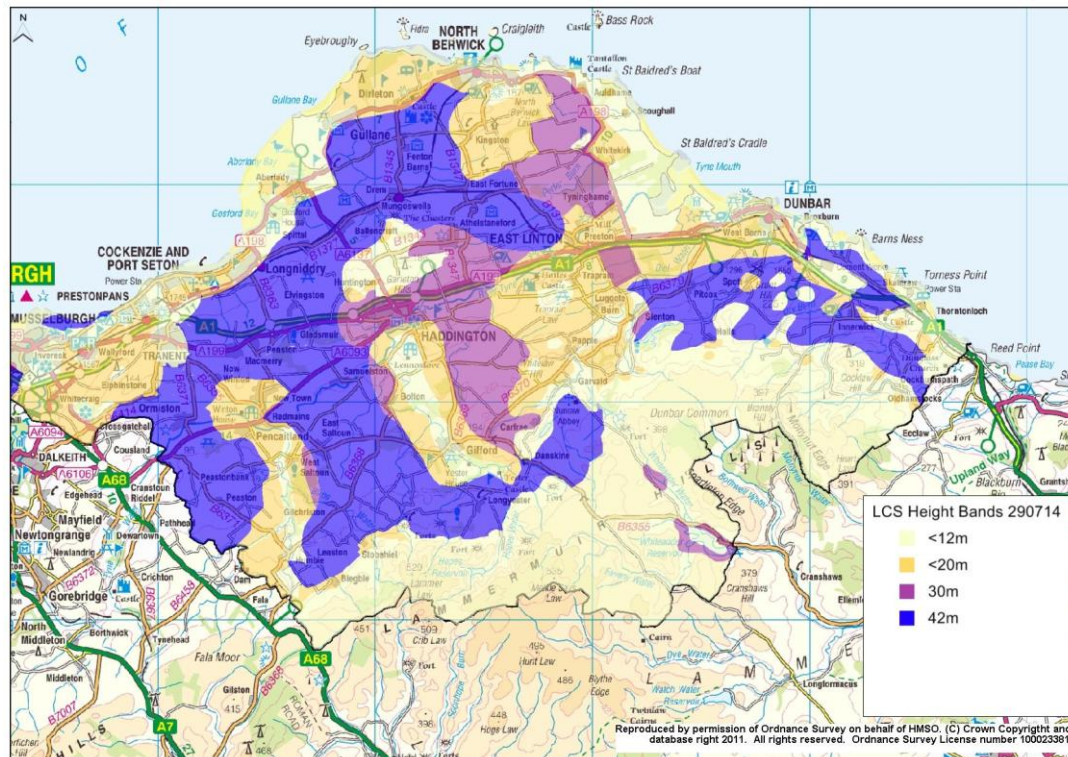
7.28 However, based on a detailed landscape capacity study (2005, supplemented 2011) the Council remains of the view that much of the land within and outwith the Group 2 area is sensitive to wind turbine development. The Scottish Government’s new approach would suggest that those areas outwith the Group 2 areas - i.e. Group 3 areas - may have greatest capacity for wind energy development. However, the Council’s landscape capacity study suggests that parts of the Group 3 areas are among the most sensitive. The Supplementary Landscape Capacity Study considered sensitivity of the landscape to smaller scale wind development, and where there might be capacity for particular types. The Council has already published Supplementary Planning Guidance for Wind Farms over 12MW (November 2013) as well as Supplementary Planning Guidance for Lowland Wind Turbines (June 2013). This guidance generally remains relevant and their principles should continue to be followed. A new spatial framework for wind energy development in the area will be prepared and it will set out the Council’s views on cumulative issues.



7.29 SPP states that the LDP should identify where there is scope for wind farm development in the area. In respect of wind farm developments above 12MW, the Council is of the view that there is no scope for any further such stand alone developments due to cumulative issues. However, there may be limited scope for development above 12MW in the Lammermuir Hills where they are read as extensions to existing wind farms, subject to it satisfying policy criteria. Based on existing guidance, the areas which at that time were not considered to have reached the limits of development without adverse cumulative impact are illustrated on the plan above and below (extracted from existing guidance), but further consideration of cumulative impacts may alter these areas. This could mean that the areas not affected by cumulative issues could be reviewed – i.e. extended or reduced in size and / or that new areas may be identified.



7.30 SPP also notes that LDPs should set out the minimum scale of wind energy development their spatial framework is intended to apply to. The Supplementary Landscape Capacity study considered wind development from 12m single turbines to up to 6 turbines of 120m high, while the original study considered larger scale development, including extensions to existing windfarms. The Council considers that the findings of these studies remain relevant. It is proposed that the new spatial framework would relate to the scales of development for which potential is shown in the Supplementary Landscape Capacity Study.



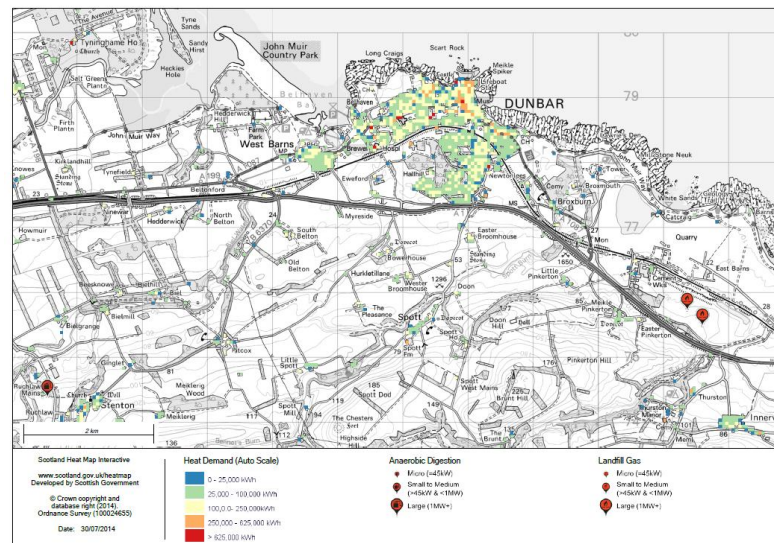
7.31 The map above shows the maximum height of development for which there was considered to be capacity in the Supplementary Landscape Study, which did not consider the scope for larger scale wind energy development. It is intended that the heights shown here are the minimum scale of development to which the spatial framework would apply. Within the Group 2 area, proposals for wind energy developments above the heights specified on the plan above would normally be resisted. Within the Group 3 area the potential location for wind farm development has already been identified above; elsewhere in the Group 3 area proposals for wind energy developments should be consistent with the height bands identified on the plan above. This takes account of the landscape capacity study which provides a detailed consideration of landscape and visual impact.

7.32 In addition to the above, policy criteria, similar to those in the current local plan, will be used to protect cultural and natural heritage assets as well as individual houses or those communities not identified in the plan. Consideration of cumulative issues will feature as a policy criterion. Cumulative issues for windfarms of over 12MW have been identified in the existing supplementary guidance for Windfarms of Over 12MW; for smaller scale development, cumulative issues were identified in the Supplementary Landscape Capacity Study. For both scales of development, the cumulative impact issues are similar and they are set out at Appendix 2. The areas to which cumulative issues apply will be reviewed and set out in Supplementary Guidance.

Heat Mapping / Networks

7.33 As well as deriving heat from renewable sources, the use of existing heat, sometimes given off as waste heat, should be promoted. The Scottish Government has produced Heat Maps, which indicate demand for heat as well as renewable electricity generators and other producers of heat. However, these maps are still being refined. The heat maps should be used to identify potential opportunities for co-locating heat producers and users. Local Development Plans are to support the development of heat networks wherever possible and the LDP will contain such a policy.

Heat Map Extract



Decentralised Energy and Heat Networks & Other Renewable Energy Development

- 7.34 In the development of larger sites, or in the development of new settlements, energy centres and the infrastructure for creating district energy and heat networks should be provided; there may be scope for district heating schemes, combined heat and power or to utilise geothermal opportunities. The scope to secure energy and heat from incinerating waste may also be possibility in certain circumstances, such as where facilities emerge adjacent to demand. Where heat networks are not viable, micro generation and heat recovery associated with individual properties shall be encouraged. These matters will be addressed in LDP policy.
- 7.35 There has also been interest in solar energy proposals, anaerobic digestion and small scale hydro schemes in the area, which bring their own impacts. Currently, these proposals are assessed on their merits. No policy or supplementary guidance currently exists in respect of that type of renewable energy development in East Lothian.
- 7.36 Any approach to these issues will need to reconcile the competing objectives of supporting renewable energy generation while maintaining and enhancing the character and quality of the East Lothian landscape and townscape of its settlements.

| Table 31: Energy, Including Renewable Energy | |
|---|--|
| Preferred Approach | <p>In relation to energy, including renewable energy the following approach is preferred:</p> <ul style="list-style-type: none"> • Support Cockenzie becoming a gas fired power station, consistent with NPF3 and current Section 36 consent and safeguard the consented route for the overland gas pipeline to support Cockenzie Power Station becoming gas fired; • Support Cockenzie as a potential location to support off shore renewable industry and / or for port related activity, and in to the longer term potentially Torness too; • Support grid connection for off shore renewables, including (underground) transmission line to point of connection along the Forth coast, particularly at Cockenzie and / or Torness, and subject to minimising landscape impact including by combining infrastructure where possible; • Illustrate spatial framework for wind energy proposals and prepare associated supplementary guidance with a view to reviewing the areas not affected by cumulative issues – i.e. extend or reduce them in size and / or identify new areas; |

| | |
|-------------------------------|---|
| | <ul style="list-style-type: none"> • Promote district heating and combined heat and power facilities in large scale development sites as well as the use of heat from renewable sources and waste heat; • Consider the preparation of a specific policy and / or guidance for other forms of renewable energy proposals such as solar and small scale hydro schemes were appropriate. |
| Reasonable Alternative | In relation to energy, including renewable energy the alternative approach is generally the same as the preferred approach, <u>but</u> in relation to the spatial framework for wind energy proposals, continue to use existing guidance for larger scale wind farm development as regards cumulative issues instead of reviewing this. |

Question 22: Energy, Including Renewable Energy

In terms of approach to energy proposals, including renewable energy proposals, 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?

Use of Low & Zero Carbon Technologies in New Buildings

- 7.37** The Town and Country Planning (Scotland) Act 1997 (as amended), Section 3F, requires LDPs to include policies that require all new development to be designed to ensure new buildings avoid a specified and rising proportion of the projected greenhouse gas emissions through use of low and zero-carbon generating technologies (LZCGT). SPP recommends that such policies accord with the standards, guidance and methodologies of the building regulations. Building Standards promote a 'fabric first' approach for new construction and do not currently mandate the use of LZCGT, nor are they expected to do so when revised standards are introduced in 2015.
- 7.38** Sustainability labelling was introduced to the Scottish Building Standards in 2011, requiring all new buildings submitted for building warrant to achieve a sustainability label. A 'Bronze' label indicates compliance with the mandatory standards, while 'Bronze Active' indicates that these have been met partly through the use of LZCGT. There are further optional labels with rising sustainability requirements.
- 7.39** The Scottish Government has suggested that planning authorities may want to link their Section 3F policies to the sustainability labelling scheme. However, an 'active' label only demonstrates that LZCGT have been used and there is currently no scope via sustainability labelling to demonstrate that a specified proportion of emissions are avoided through LZCGT as required by Section 3F of the Planning Act.
- 7.40** There are two broad planning policy options in response to Section 3F, either to require emissions savings that are additional to Scottish Building Standards, or to only require that the emissions savings from LZCGT are part of the way in which those standards are met. The latter approach would not achieve any emissions reductions in itself, and may in fact result in less energy efficient buildings. It would, however, promote the use of LZCGT.
- 7.41** In either case, an LDP policy is expected to cover three main elements: a proportion of emissions to be saved; at least one increase in the proportion of emissions to be saved; and a requirement that the savings should be achieved through the use of LZCGT (rather than energy efficiency measures). The detail of the policy including percentage requirements and timescales for increases, together with how it will be implemented in practice and any exceptions that might be appropriate, may be best located within Supplementary Guidance.

Table 32: Use of Low & Zero Carbon Generating Technologies in New Buildings

| | |
|-------------------------------|--|
| Preferred Approach | In relation to low and zero carbon generating technologies the preferred approach is to require Scottish Building Standards mandatory CO ₂ reduction targets to be achieved partly through LZCGT. The percentage requirements and timescales for increase would be set out in SG but these would be anticipated as initially being 10% of mandatory CO ₂ reductions to be achieved through LZCGT. |
| Reasonable Alternative | In relation to low and zero carbon generating technologies the alternative approach is to require LZCGT to be used to reduce CO ₂ emissions beyond Scottish Building Standards mandatory requirements. The percentage requirements and timescales for increase would be set out in SG but could be set initially at an additional 10% CO ₂ emissions reduction through LZCGT beyond Scottish Building Standards mandatory requirements. |

Question 23: Use of Low & Zero Carbon Generating Technologies in New Buildings

In terms of approach to use of low and zero carbon generating technologies (LZCGT) in new buildings 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?

Minerals, Including Aggregates & Coal

- 7.42 SPP requires Development Plans to identify, review and safeguard areas of search for mineral extraction⁴⁶. Planning authorities are also to ensure a minimum 10 year landbank of permitted reserves for construction aggregates. The SDP requires the LDP to identify areas of search for mineral extraction, including aggregates and coal. This review has been undertaken at SESplan level in so far as the available landbank is concerned⁴⁷. It also requires mineral resources to be safeguarded where appropriate and use of secondary / recycled aggregates to be encouraged.
- 7.43 The current position is as follows. There may be a shortage of sand and gravel in terms of maintaining a 10 year landbank in the SESplan area. Longyester sand and gravel quarry in East Lothian has reserves estimated to be sufficient for one year, and an application for its extension has been approved. The LDP will safeguard this extension area as an area of search for future sand and gravel extraction in East Lothian. It will also safeguard Skateraw sand and gravel quarry. There is no shortage of hardrock as the landbank in the SESplan area is greater than 10 years. In East Lothian, Bangley hard rock quarry is currently inactive, but has a reserve of around 14 years remaining, as does Markle Mains hard rock quarry which is active. A Limestone quarry is active at Oxwellmains providing raw materials for cement manufacture and the LDP should safeguard the resource and provide for its working.
- 7.44 There are currently no operational coal mines of any kind in East Lothian. Previous operations have ceased at Blindwells, with BGS plans illustrating the current allocated site and land to the east of it as a 'worked area'. A previous planning appeal for further opencast coal workings around Tranent and Elphinstone was dismissed due to the proximity of the proposed workings to established communities as well as the associated landscape and amenity impacts. Yet, if appropriate, workable resources should be safeguarded to help secure a diverse energy mix and energy security. The sustainable restoration / after care of any extraction site to beneficial use must be secured and guaranteed. The LDP will take in to account any further Scottish Government guidance on this matter. The impacts of any extraction on communities, the environment and the built and natural heritage must be minimised and mitigated. The SDP requires the LDP to:
- Safeguard minerals from sterilisation where the deposits are of a sufficient scale or quality to be of potential commercial interest and their extraction is technically feasible and may be carried out in a way that is environmentally and socially acceptable;

⁴⁶ Scottish Planning Policy paragraphs 234 - 248

⁴⁷ SESplan SDP: Minerals Technical Note

- Identify areas of search for aggregate minerals and coal, or, where appropriate, specific sites, having regard to national guidance and other environmental objectives of the SDP.

7.45 The LDP should safeguard all workable mineral resources which are of economic value and ensure that these are not sterilised. These areas are identified on the plans at Appendix 3. Where possible and appropriate, LDP's should identify Areas of Search where surface coal extraction may be acceptable during the plan period and beyond, with particular emphasis on protecting local communities from significant cumulative impacts⁴⁸. Criteria based policies should be set out that specific proposal will need to address to ensure protection of the environment and to minimise landscape impact and the impact on visual amenity, traffic and on local communities, including cumulative impacts.

7.46 The SDP also requires the LDP to include criteria-based policies to assess mineral extraction proposals, including provision for restoration and enhancement. There is scope for some minor change to these existing local plan policies, for example to strengthen the requirements for restoration and aftercare and associated guarantees.

Methodology for Identifying a Potential Area of Search for Open Cast Coal Extraction in East Lothian

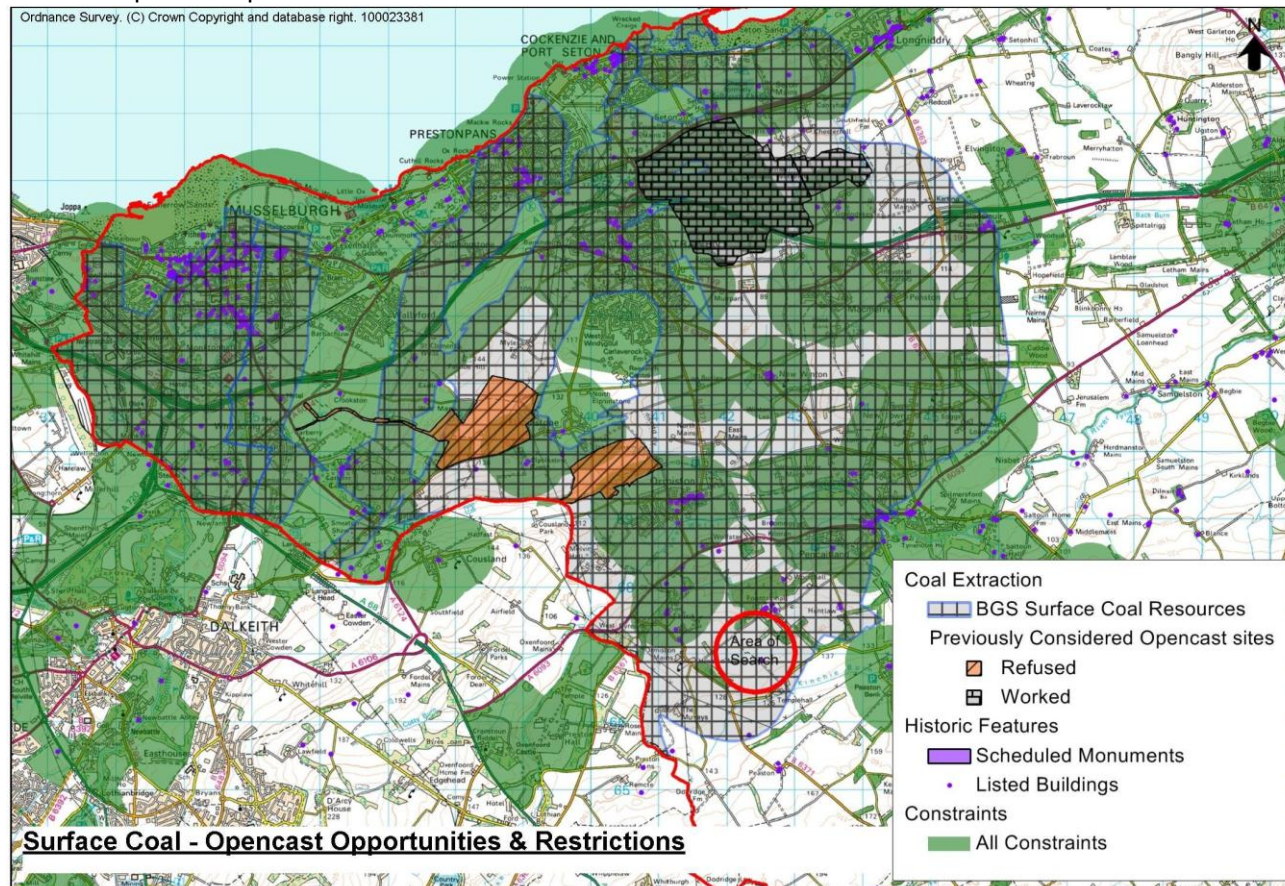
7.47 British Geological Survey has produced a map of the coal resource in East Lothian. This was used to identify a study area of where there may be coal deposits of potential commercial interest. Within this zone, it was necessary to consider 1) areas that require protection from extraction operations and 2) if there are any positive indicators for a part of the area (access to good rail/road links /opportunities for landscape restoration) that may suggest it should be considered as a potential location for extraction. Firstly, areas where coal extraction should not take place were sieved out of the study area. These areas are those surrounding existing communities and international, national or local sites designated as built or natural heritage assets.

7.48 Planning authorities can decide what constitutes a community. The groupings identified as communities are settlements identified in the current local plan and groupings of 10 or more houses. A 500m buffer around these has been used, including those outwith East Lothian. It is unlikely that a planning application within this buffer area for coal extraction would be successful. The groupings so identified were: Carberry, Crossgatehall, Cousland, Newcraighall, Queen Margaret University, Boggs Holdings, Ormiston Hall/West Byres, Smeaton, Goshen Farm Steading, Dolphinstone, Buxley Farm Steading, Elphinstone Tower Farm cottages, Greendykes, Penston and Seton. Where there are also groupings of less than 10 houses, or individual houses, they would be protected by policy criteria; however, their existence may make obtaining planning permission less likely.

⁴⁸ Scottish Planning Policy paragraph 239

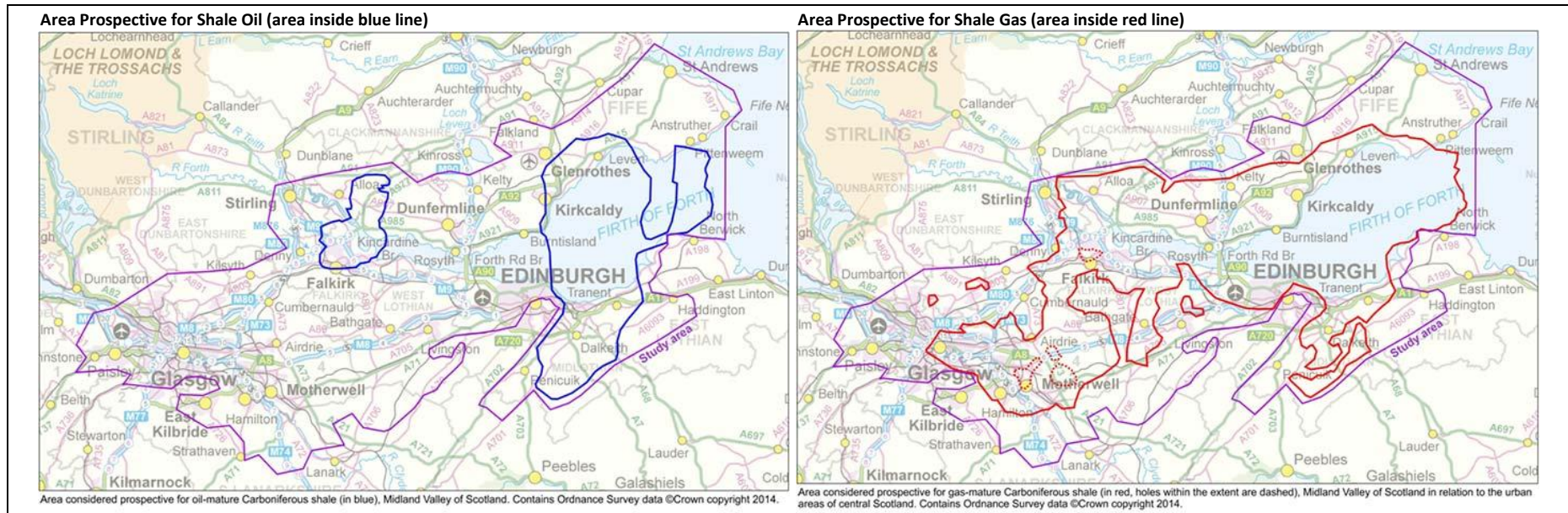
- 7.49 In terms of cultural and natural heritage, international designations such as Special Protection Areas, Special Areas of Conservation and RAMSAR sites have been sieved out of the study area. The same is true of national designations such as Sites of Special Scientific Interest, Gardens and Designed Landscapes, Scheduled Monuments and Listed Buildings. Peat and rare soils do not overlap the coal area, and there are no water supply catchment areas that affect the coal area. There are some areas that are affected by 1:200 year flood risk zones. The coal field is also contiguous with the Drinking Water Protected Area (Groundwater). There are also areas of ancient and semi-natural woodland in the area underlain by coal deposits. Local natural and cultural heritage assets which have also been sieved out of the study area include Local Biodiversity Sites, Conservation Areas and that part of the Green Belt within East Lothian.
- 7.50 Other factors which have been taken into account are that some employment locations may be sensitive to opencast workings. Some sites important for tourism, whether for accommodation or as an attraction could also be impacted by opencast workings. The strategic employment sites on or near the coalfield are at Old Craighall Business Park, Macmerry, and Blindwells are relevant. Some other existing employment or tourism sites may also be sensitive. These include Elphinstone Research Centre, Seton Sands Holiday Park, Old Craighall Travelodge, Carberry Tower, Adniston Manor, Drummohr Caravan site, Winton House, Levenhall Links Nature Reserve and Musselburgh Racecourse.
- 7.51 The plan on the next page illustrates some of these constraints / features / decisions and a potential area of search for open cast coal working which lies outwith these areas. Importantly however, following the above constraints mapping and in view of the constraints and characteristics of the area, the location of remaining unworked shallow coal deposits and previous Reporter's decision on the current local plan, the Council has concluded that there is no scope to identify any area of search for open cast coal extraction in East Lothian within which proposals would have a realistic prospect of support.
- 7.52 However, if an area of search were required to be identified, traffic and environmental impacts must be minimised. On this basis, the area covered by the mapped constraints was excluded as well as the area between Tranent, Macmerry, Pencaitland and Ormiston as it would not be suitable due to its likely visual impact and the need for traffic to route through Tranent or Pencaitland. A potential area of search for surface coal working is therefore at the location shown on the plan below.

7.53 Notwithstanding this, it is not clear if the potential area of search indicated on the plan below is underlain by deposits which are of sufficient scale or quality to be of commercial interest. It is also not clear if their extraction is technically feasible and could be carried out in a way that is environmentally and socially acceptable. A full assessment of the environmental effects and need for mitigation would be required at the level of any project - it is very likely that project level EIA would be required. However, it remains the Council's view that any open cast operation in any of these areas is likely to have unacceptable impacts.



Shale Oil and Gas

7.54 The British Geological Survey has recently produced plans indicating that areas in the west of East Lothian have potential for the working of shale oil and gas. The plans below illustrate the areas where there may be shale oil and gas deposits in East Lothian.



7.55 Key factors in the assessment of any such proposals will include the impact on neighbouring uses, communities and the environment, including the water environment, as well as on health and on amenity in general. It is proposed that the LDP will include a new criteria based policy that will seek to manage such operations while seeking to safeguard the environment and amenity.

7.56 It is likely that any such proposals would require Environmental Impact Assessment. In addition to assessing the impact of any such proposals on those considerations identified above, a particular focus of any assessments would include the identification of onsite activities that may pose a

potential risk, including the emission of pollutants and the creation and disposal of waste. As part of any such assessments, a source – pathway – receptor model should be used to monitor, manage and mitigate any identified risks.

7.57 One of the outputs of such assessments would be the identification of buffers zones between such operations and sensitive receptors such as existing communities, natural / cultural heritage assets and uses sensitive to / at risk from such operations. It would be for the planning authority, in consultation with other statutory consultees, to determine if such buffers zones are appropriate and sufficient. Where they are deemed inappropriate, planning permission would be refused.

| Table 33: Minerals, Including Aggregates & Coal | |
|---|---|
| Preferred Approach | <p>In relation to minerals, aggregates and coal, the preferred approach is as follows:</p> <p>Spatial Strategy approach:</p> <ul style="list-style-type: none"> • Do not identify an area of search for open cast coal extraction; • Approval of planning permission for an extension of Longyester sand and gravel quarry has increased associated reserves in East Lothian so no further action proposed other than to identify consented area and delete existing area of search for sand and gravel extraction; • Hardrock can be met from existing operational and non-operational quarries so no further action proposed other than to safeguard these existing extraction areas. <p>Policy approach:</p> <ul style="list-style-type: none"> • Develop policy to manage proposals for the extraction of shale gas or oil; • Clarify the role of restoration bonds / guarantees in relation to proposals for mineral workings. |
| Reasonable Alternative | <p>In relation to minerals, aggregates and coal, the alternative approach is as above, <u>but</u> in relation to an area of search for open cast coal:</p> |

- An Area of Search may be identified south of the A6093 due to proximity to the trunk road network. However, it is not clear if a potential area of search there is underlain by deposits which are of sufficient scale or quantity to be of commercial interest or if extraction could be carried out in a way which would be acceptable. Features in this area, including individual houses, would be protected by criteria based policy. Based on the constraints mapping described above this is one of the areas not directly covered by the constraints listed. However, notwithstanding this, it remains the Council's view that any open cast operation in any of these areas is likely to have unacceptable impacts.

Question 24: Minerals, Including Aggregates & Coal

In terms of the approach to minerals, 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?

Waste

- 7.58** The Scottish Government's Zero Waste Plan (ZWP) provides the national context regarding waste policy and how the planning system is required to consider waste. It contains ambitious targets for recycling of waste in Scotland and requires local authorities to plan for all waste streams, not just Municipal Solid Waste. This means that additional waste management facilities may be required to ensure that all types of waste are managed as sustainably as possible. SPP confirms the Scottish Government's position regarding waste policy and also sets out its position relating to proximity principle and need: essentially there is considered to be a 'national' need for waste management facilities.
- 7.59** SPP also expects development plans to set out a locational or spatial strategy for waste management development, either by allocating specific sites for waste management facilities, and/or indicating clearly and positively that land designated for employment, industrial or storage and distribution uses is appropriate for many waste management installations (subject to site specific considerations). SESplan notes that there is an estimated 20 year supply of residual landfill capacity, which is in excess of Scottish Government requirements. There is therefore no need for more during the plan period, unless justified in the context of the Zero Waste Plan and SEPA Landfill Capacity Reports. SESplan requires that Oxwellmains is safeguarded as a site for waste treatment facilities, and also advises that the function of operational waste sites should not be compromised. SPP confirms that Development Plans should give effect to the aims of the ZWP and also requires existing sites to be safeguarded⁴⁹.
- 7.60** The current Local Plan predates the national ZWP, and instead refers to the now superseded National Waste Plan and Area Waste Plans. The proximity principle and the concept of 'regional self-sufficiency' have now been amended by the ZWP and the BPEO concept is also no longer applicable. The Local Plan is therefore out of date on this topic and requires to be updated. Policy BUS1, which relates to business and general industrial land allocations, does indicate that waste management facilities may be permitted within such areas if they are compatible with employment use. However, no further locational guidance for waste management facilities is provided nor any criteria-based approach to the assessment of any such proposals. The adopted Plan does contain a requirement that the layout and design of certain types of new development makes provision for recycling facilities (policy DP23).

⁴⁹ Scottish Planning Policy paragraph 175 - 192

Table 34: Waste

| | |
|-------------------------------|---|
| Preferred Approach | The preferred approach is to comprehensively review the text of the Local Plan in respect of waste developments to reflect the new national policy context as set out in the ZWP and SPP. The LDP would prioritise employment locations as suitable in principle for many waste management developments, subject to criteria being met including amenity impacts on surrounding uses. Sites allocated for class 4 business uses only may not be suited to certain technologies, depending on their impacts. The policy requirements for recycling facilities to be included in site design and layout for will be retained (Policy DP23). Design guidance on waste storage, recycling and collection space will be provided. The use of site waste management plans for appropriate scales of development will also be promoted, to reduce construction and demolition waste. Existing and committed waste management facilities (including but not limited to Oxwellmains) will be identified in the LDP Proposals Map(s) and will be safeguarded. The LDP policies will be amended to clarify that inappropriate co-location should be avoided. |
| Reasonable Alternative | The alternative approach is to comprehensively review the text of the Local Plan in respect of waste developments to reflect the new national policy context as set out in the ZWP and SPP. The LDP would introduce a criteria based policy against which proposals for waste management facilities would be assessed, including amenity impacts on surrounding uses. Existing and committed waste management facilities (including but not limited to Oxwellmains) will be identified in the LDP Proposals Map(s) and will be safeguarded. |

Question 25: Waste

In terms of the approach to waste 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?

Minor Policy Review & New Policies to be Introduced

7.61 The Monitoring Statement indicates where and how the Council intends to promote for the LDP a minor review of existing local plan polices and the introduction of new policies, either in the LDP itself or in Supplementary Guidance. These are also listed in Appendix 6 below.

Question 25: Minor Policy Review & New Policies to be Introduced

The Monitoring Statement indicates where and how the Council intends to promote for the LDP a minor review of existing local plan polices and the introduction of new policies, either in the LDP itself or in Supplementary Guidance. Do you have any comments on these proposals? Please indicate which policies you are referring to.

Do you have any other comments to make?

Question 26: Other Comments

Finally, do you have any other comments to make on the Main Issues Report that are not covered by the previous questions?

1 Scottish Planning Policy:

SPP states that LDPs should allocate land on a range of sites which are effective or expected to become effective to meet the housing land requirement up to year 10 from the predicted year of adoption, ensuring a minimum of 5 years effective land supply at all times (paragraph 119).

2 Extract from Planning Advice Note 2/2010: Affordable Housing and Housing Land Audits, paras 55-56:

“To assess a site or a portion of a site as being effective, it must be demonstrated that within the five-year period beyond the date of the audit the site can be developed for housing (i.e. residential units can be completed and available for occupation), and will be free of constraints on the following basis:

ownership: the site is in the ownership or control of a party which can be expected to develop it or to release it for development. Where a site is in the ownership of a local authority or other public body, it should be included only where it is part of a programme of land disposal;

physical: the site, or relevant part of it, is free from constraints related to slope, aspect, flood risk, ground stability or vehicular access which would preclude its development. Where there is a solid commitment to removing the constraints in time to allow development in the period under consideration, or the market is strong enough to fund the remedial work required, the site should be included in the effective land supply;

contamination: previous use has not resulted in contamination of the site or, if it has, commitments have been made which would allow it to be developed to provide marketable housing;

deficit funding: any public funding required to make residential development economically viable is committed by the public bodies concerned;

marketability: the site, or a relevant part of it, can be developed in the period under consideration;

infrastructure: the site is either free of infrastructure constraints, or any required infrastructure can be provided realistically by the developer or another party to allow development; and

land use: housing is the sole preferred use of the land in planning terms, or if housing is one of a range of possible uses other factors such as ownership and marketability point to housing being a realistic option.

56. Programming of sites is an important element of the audit. Programming is an indication of the expected annual completions on each site, taking account of the lead-in times, the ability of the site to be developed, and the capacity of the local housing market. The housing land audit should show the expected completions on sites over the following five years. The contribution of any site to the effective land supply is that portion of the expected output from the site which can be completed within the five-year period. It will be important that the programming is also related to the expected timing of housing land allocations in the local development plan.”

3 Extract from Scottish Government’s Chief Planner’s letter dated 2 November 2010 to Heads of Planning in Scotland:

“The concept of ‘effective housing land’ centres on the question of whether a site can be developed i.e. whether “residential units can be completed and available for occupation” (Planning Advice Note (PAN) 2/2010: Affordable Housing and Housing Land Supply paragraph 55). The PAN also says an effective site has to be free of seven specified constraints and bearing in mind the current economic climate I would like to draw your attention to the following extracts:

Ownership – the site is in the ownership or control of a party which can be expected to develop it or release it for development;

Physical – the market is strong enough to fund the remedial work required;

Deficit funding – any public funding required to make residential development economically viable is committed by the public bodies concerned;

Marketability – the site or a relevant part of it can be developed in the period under consideration;

Infrastructure – any required infrastructure can be provided realistically by the developer or another party.”

Retention of distinctiveness of lowland and upland areas:

There is a strong, established pattern of wind turbine development in East Lothian, with large scale development in the expansive upland landscapes, and smaller scale development in the lowlands. Large scale development outwith the Lammermuir area would disrupt this distinction between landscape types. Larger scale development in the lowlands would risk trivialising the existing small scale development. Large scale development in the lowlands as well as the uplands could lead to East Lothian being defined by wind development instead of it being a component of the landscape.

Retention of distinctiveness within Scotland

It is important for the different landscapes of Scotland to remain distinctive both within their locale and both regionally and nationally. The existing pattern of development in East Lothian is different from that in Fife, Scottish Borders and Moray. The Lammermuir edge provides a boundary between the central belt and the Scottish Borders, with panoramic views at the fault line across Lowland Scotland. The distinction of these different landscapes is obvious to walkers and road travellers alike. This could be compromised by larger scale wind development in the lowlands.

Pattern of existing development and Relief from development

Existing large scale windfarms in the Lammermuirs around East Lothian are stepped back from the Lammermuir edge and have some degree of containment. They are in a 'cluster and space' pattern. Further wind farm development in the Lammermuir area, especially stand alone development, risks there being few or no areas within the East Lothian Lammermuirs which are not significantly impacted or dominated by windfarm development. It is important that some part of the landscape is retained for future and existing generations to enjoy. This is especially the case as the Lammermuirs have some of East Lothian's wildest land in terms of remoteness, naturalness and lack of modern artefacts.

Lammermuir skyline

Windfarm development on the skyline can be prominent. From parts of the East Lothian plain a considerable proportion (over half) of the skyline is affected by wind development. There are three main issues; firstly, the skyline should continue to appear as the dominant feature; secondly, wind development should continue to appear set back from the Lammermuir edge; and thirdly, spacing between windfarms should be maintained.

Oldhamstocks Conservation Area

The area in and around Oldhamstocks Conservation area is affected by existing and consented wind development. Cumulative impact on this village is a matter of concern and the Council is seeking to resist further proposals that would have an adverse effect on the setting of the conservation area.

Cumulative issues for smaller wind turbines were:

Clutter

Capacity for visual clutter in association with large and complex industrial buildings of the cement works, quarrying, Cockenzie Power Station, Power lines, transmission masts (e.g. Garleton Hills) and smaller scale elements such as pylons and transmission masts; and related impact on the landscape pattern and scenic attraction of the area. This could occur with an individual wind turbine in association with other existing development but would certainly occur if turbines were associated with the majority of land holdings.

Domination of local character

Effect on the scenic attraction of different character areas: e.g. the simplicity and openness of the agricultural plain, intricacy of river valleys; or on pattern of woodland and trees within the North Lammermuir Platform. The larger the turbine, the harder it is likely to be to accommodate a number of them without them becoming the dominant features. Intervisibility of developments would limit capacity in open and highly visible areas

Skyline

The proportion of open sweeping hills to developed skyline is an issue, both views towards the Lammermuirs from the lowlands and foothills, and within the hills. Different scale and speed of turbines on a prominent or important skyline can become a visual distraction and affect visual amenity.

Range of designs and scales in proximity

This can lead to clutter, discordance and visual confusion with different style, sizes, structure and blade movement.

Fragmentation of existing pattern of development

Where turbines do not relate well to existing buildings and point features in the landscape this affects the robust, recognisable, consistent and characteristic pattern of development. It also includes the effect of spread of built development for example development in the open spaces north of the A1 in the Musselburgh Prestonpans fringe or along A1 corridor could affect the perception of where built/industrial development ends.

Sequential effects

There are potential sequential effects on the experience of travelling in particular for the A1, A68, B6355 (Gifford to Whiteadder Road) the East Coast Mainline and the John Muir Way.

Discordance in Scale and location with existing development

This would apply to small scale development in most of the upland character areas (Lammermuir Plateau and Plateau Grassland). It would also apply to larger scale development in the lowlands.

Visual effects with existing and consented development in the Lammermuirs

This includes cumulative impacts such as development apparently spilling over the Lammermuir edge, as well as scale, design and rotation speed issues with development in the same view from important view points.

Visual Relief

It is desirable to retain some visual relief from wind turbine (and potentially other man-made infrastructure) development, in the uplands provided by Spartleton, Whiteadder valley, Lammerlaw. Diminishment of the unity and integrity of remaining hill tops in East Lammermuir Plateau should be avoided. This is provided at present by the Whiteadder and Hopes valleys, and Lammer Law and Spartleton to some extent. Visual relief is also important in the lowland context.

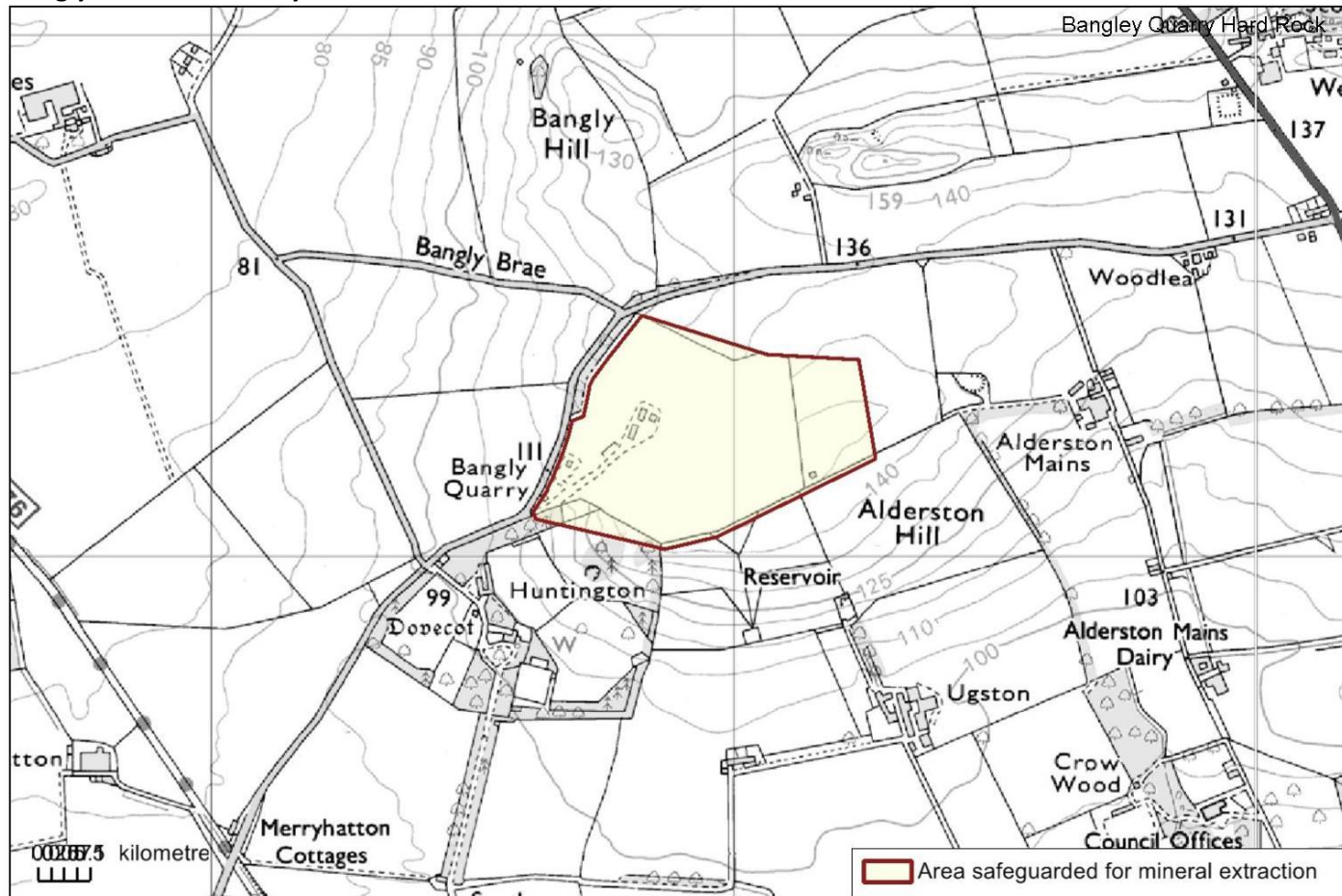
Containment of existing windfarm development

This applies particularly to development at Dun Law/Pogbie where the rim of the scarp is an important 'edge' and Aikengall/Crystal Rig and Fallago, where the Lammermuir edge provides some containment.

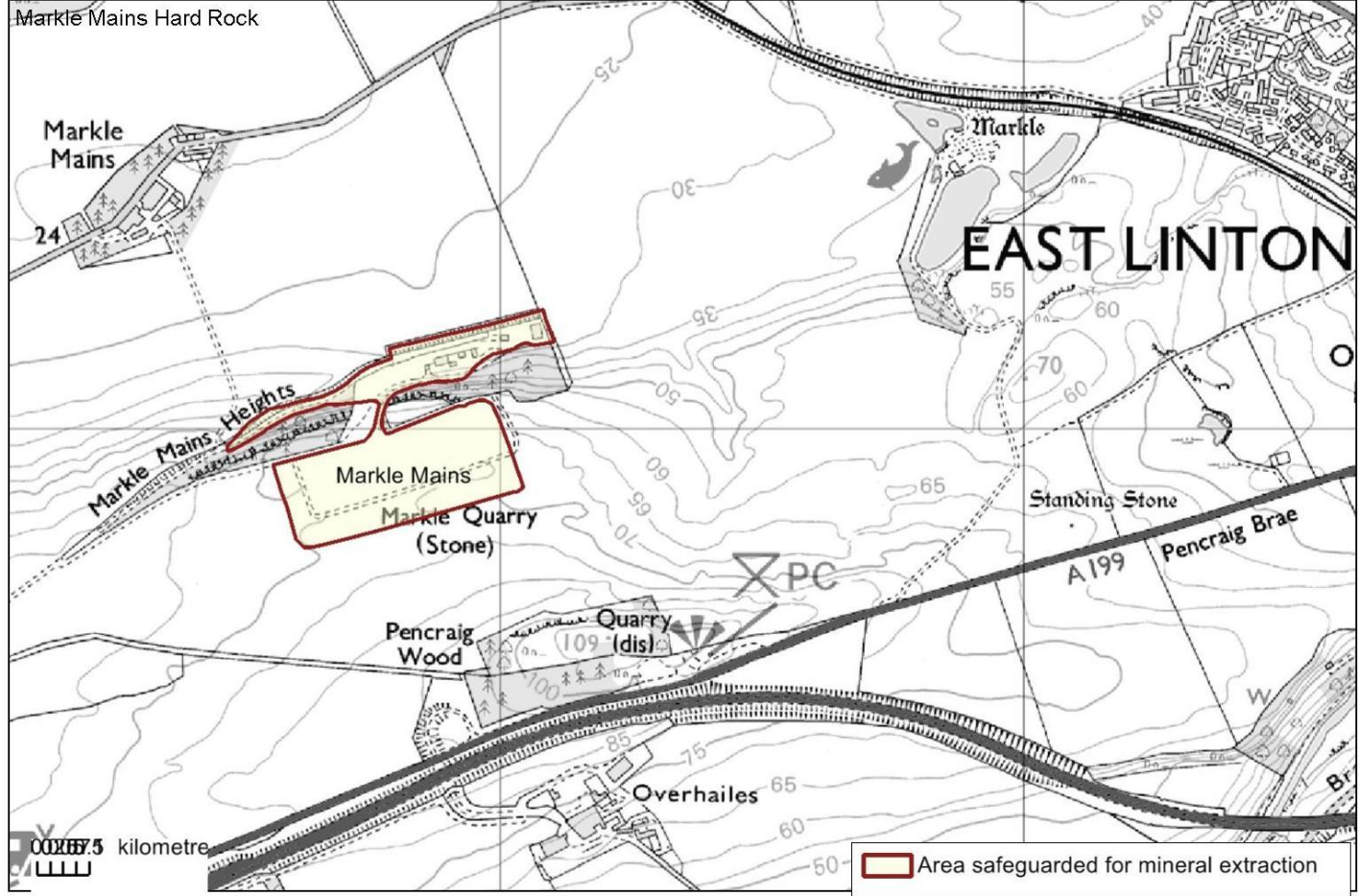
Visual Confusion

Wind clusters of more than 3 turbines up to 20m would have cumulative impact with itself as the speed of blade movement seen on mass is likely to be visually confusing and distracting.

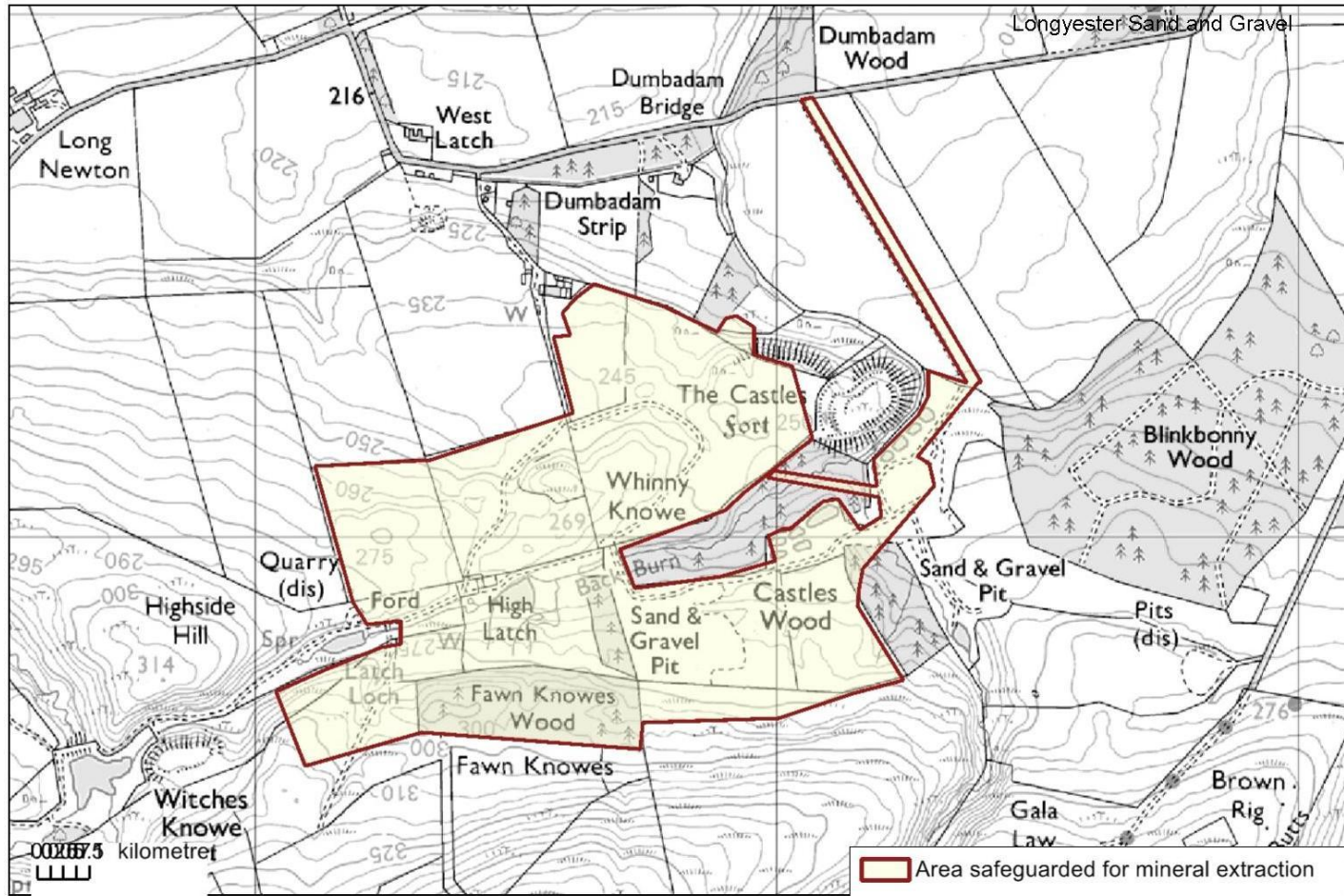
Bangly Hard Rock Quarry



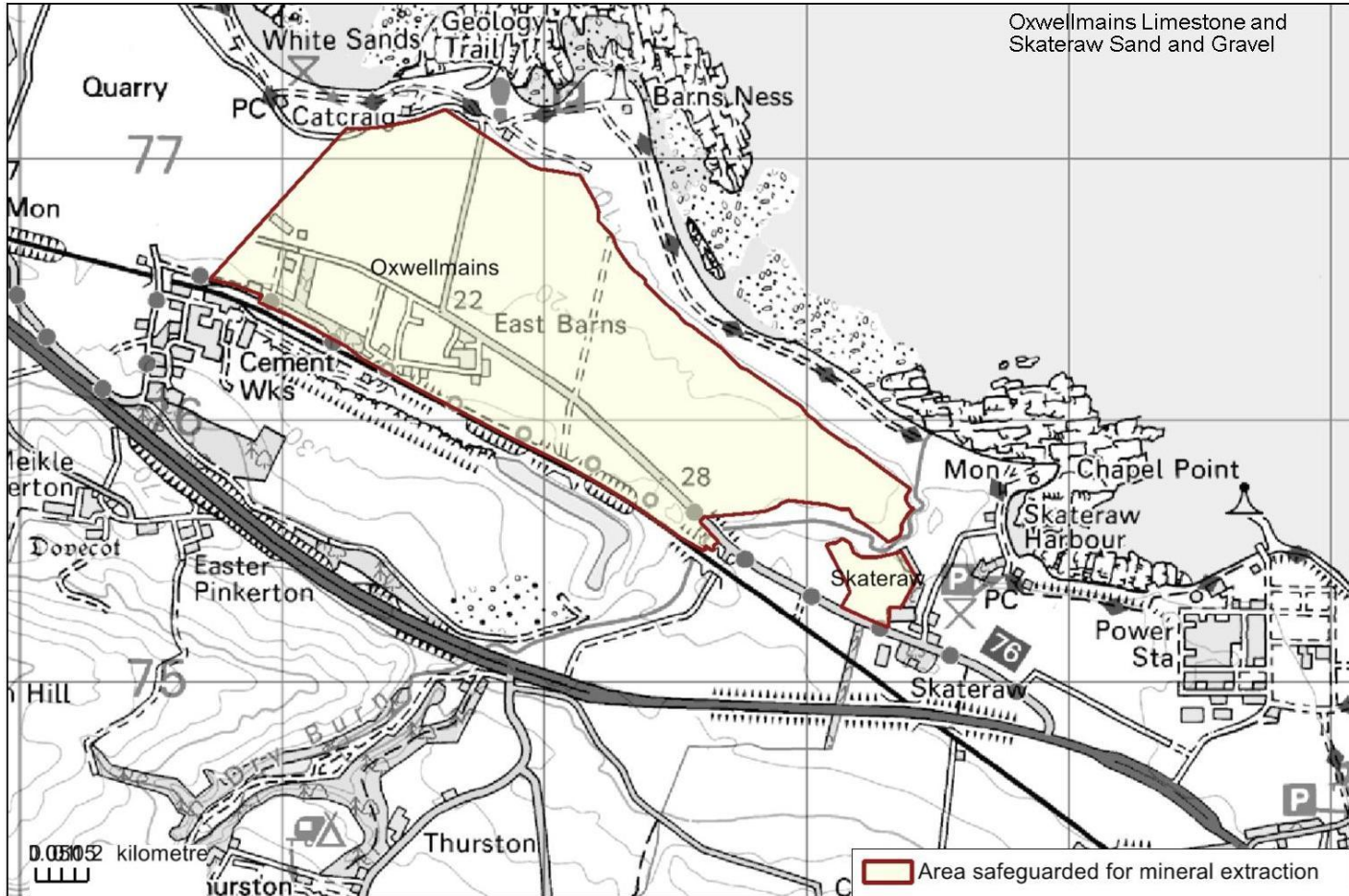
Markle Mains Hard Rock Quarry



Longyester Sand and Gravel Quarry



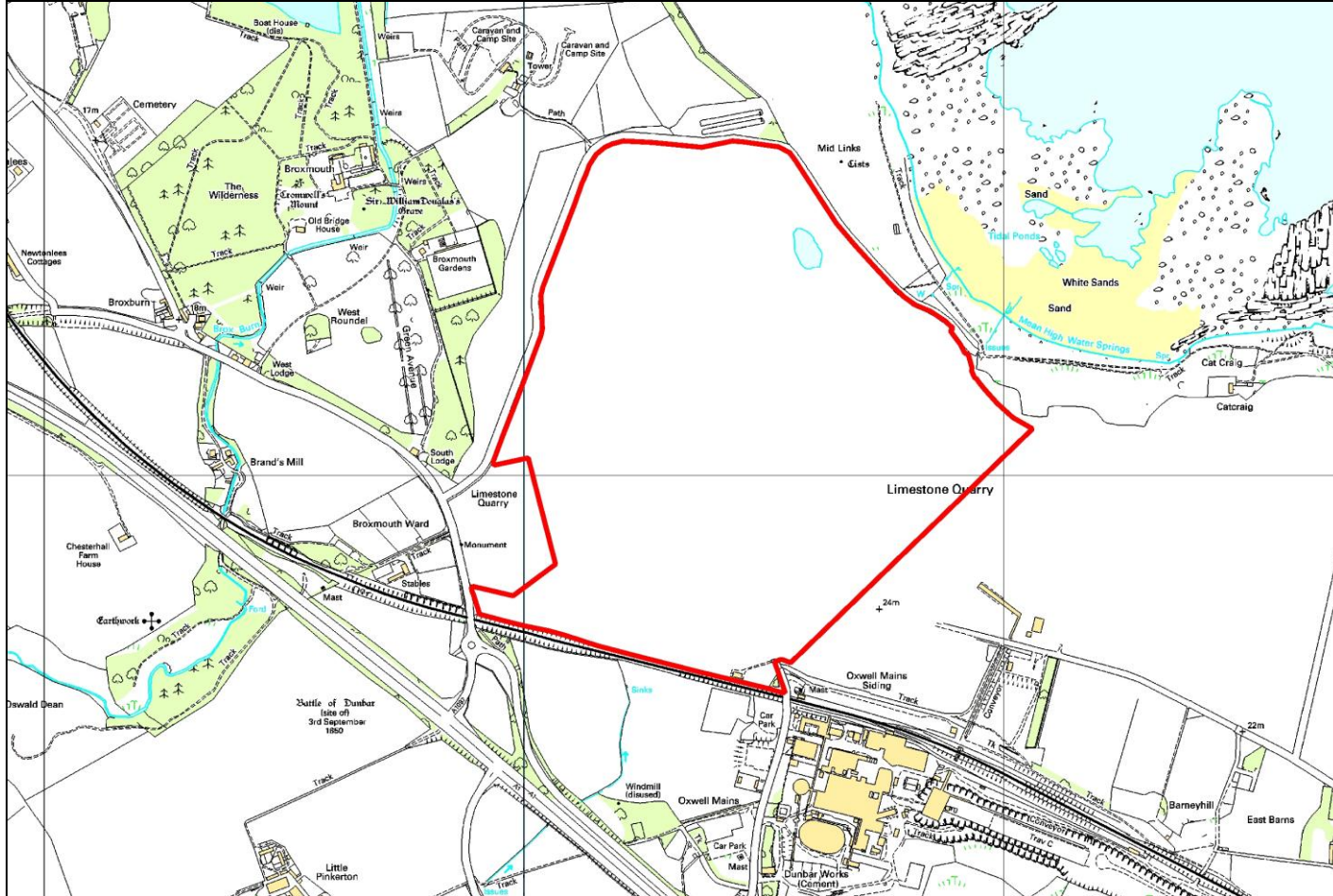
Oxwellmains Limestone & Skateraw Sand & Gravel Quarries



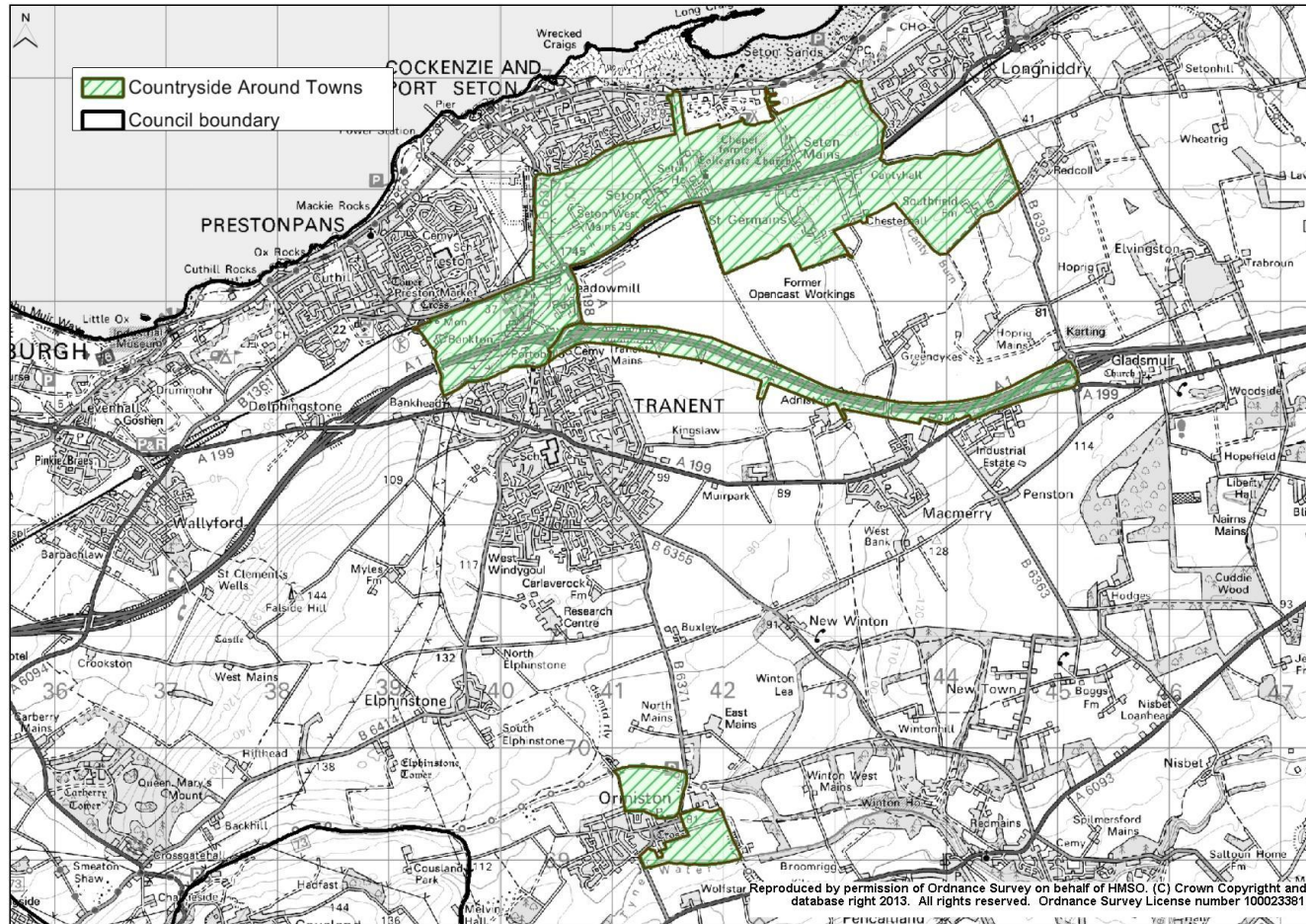
Levenhall Local Nature Reserve



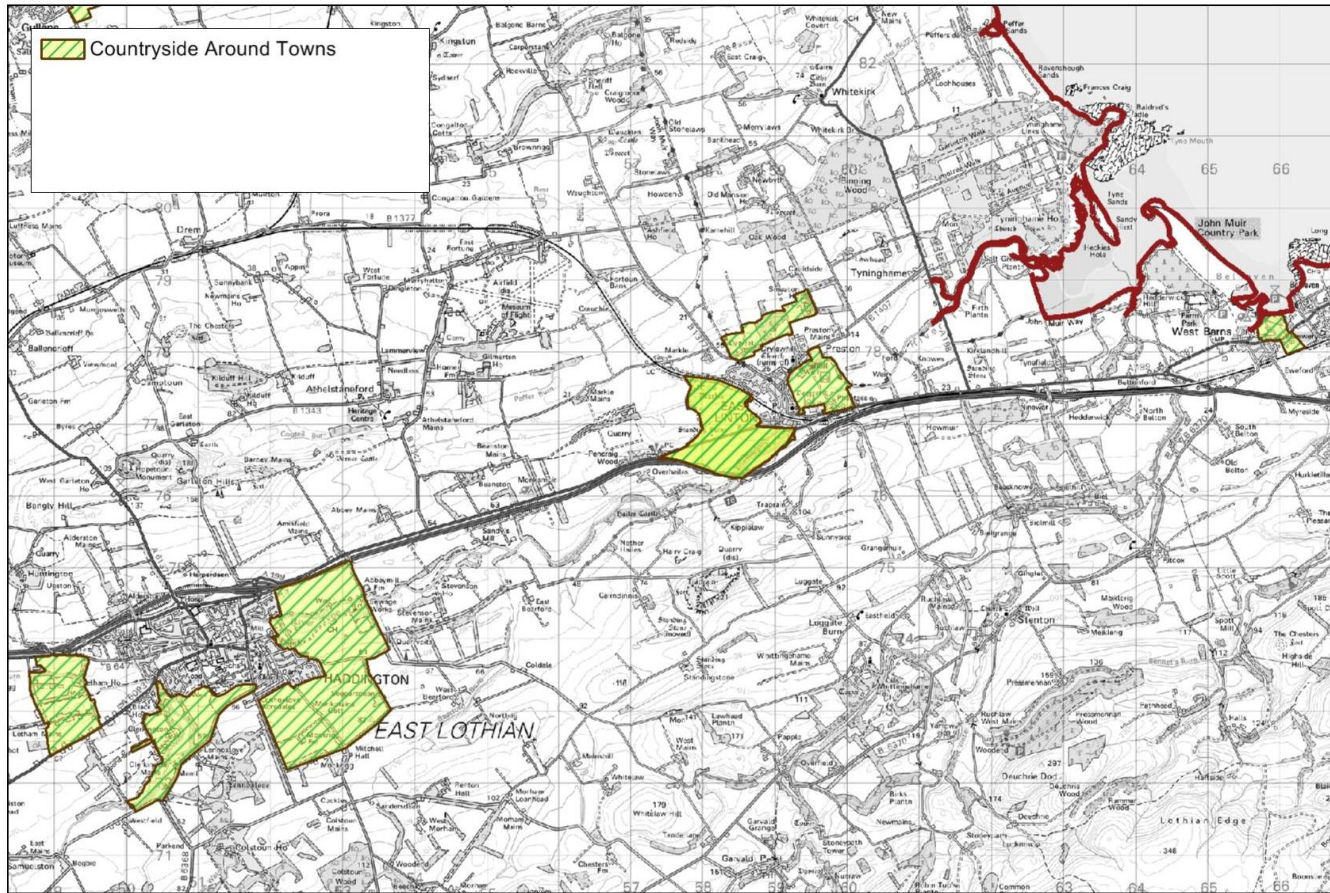
Whitesands



Western Sector

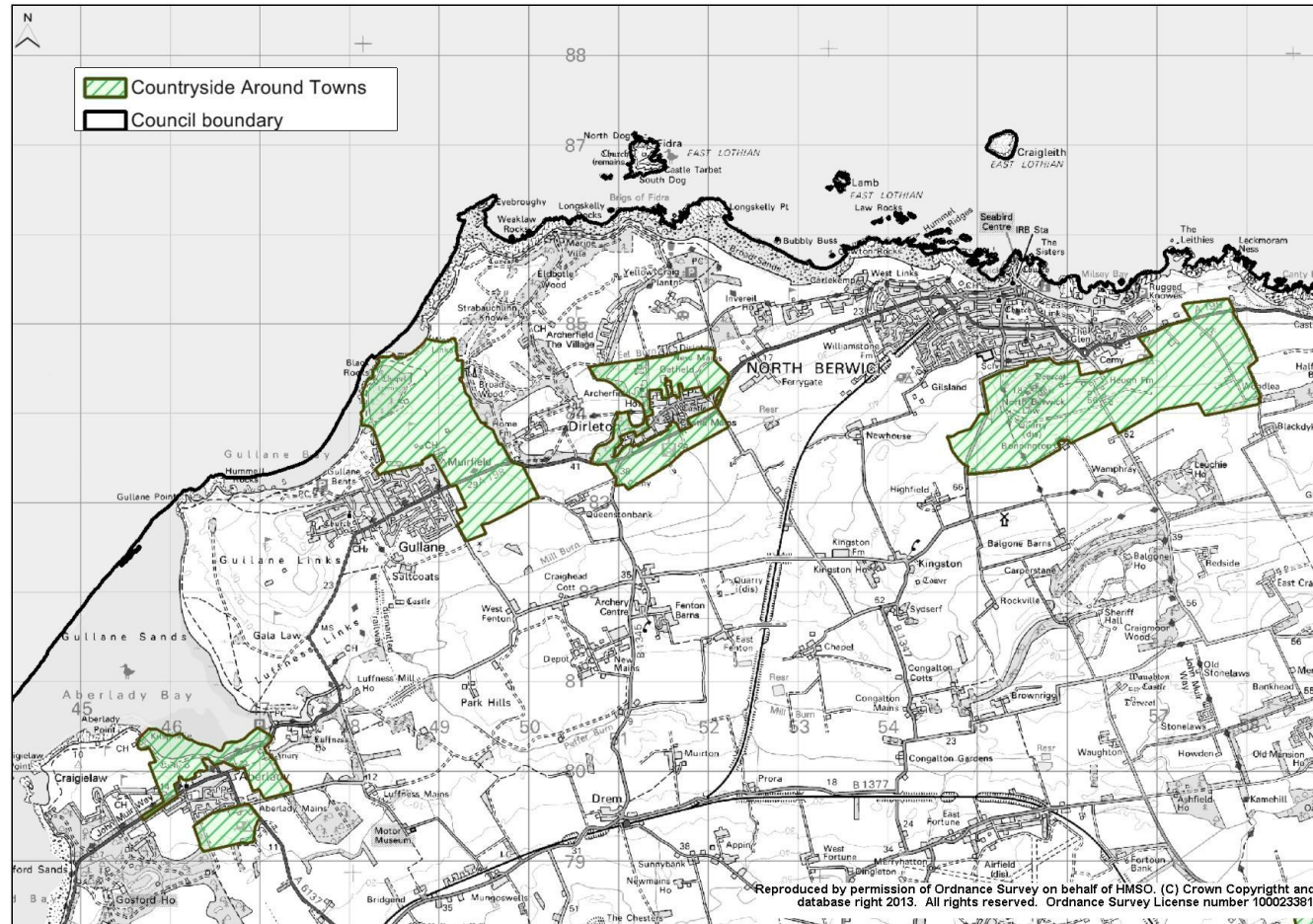


Inland Settlements



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Coastal Settlements



List of Existing Local Plan 2008 Policies Requiring Minor Review (please see Monitoring Statement)

1. Development in the Countryside
2. Development in the Edinburgh Green Belt
3. Internationally Protected Areas
4. Sites of Special Scientific Interest
5. Wildlife and Geological Areas
6. Important Local biodiversity Sites
7. Protected Trees
8. Watercourses and Wetlands
9. Residential Character and Amenity
10. Town and Village Centres, Other Retail or Mixed Use Areas
11. Development in Conservation Areas
12. Gardens and Designed landscapes
13. Former East Fortune Hospital
14. St Joseph's School Tranent
15. West Harbour Area Cockenzie
16. Business and General Industrial Allocations
17. Business Class Locations
18. Kirk Park Inveresk
19. Former Oak Tree Filling Station Haddington
20. Archerfield Estate
21. Hotels
22. New Shops
23. Protection of Local Shops
24. Preferred Area of Search for Sand and Gravel Longyester Farm
25. Surface Mineral Extraction Criteria
26. Restoration

27. Electricity Generating Stations
28. Wind Turbines
29. Oxwellmains
30. Infrastructure and Facilities Provision
31. Scottish Fire Training School Gullane
32. Haddington Flood Plain
33. Housing Quality and Design
34. Development Frameworks
35. Affordable Housing
36. Schools
37. Minimum Open Space Standards for New General Needs Housing Development
38. Play Space Provision in New General Needs Housing development
39. Protection of Open Space
40. Protection of Potential Areas of Open Space
41. Core Paths and Other Routes
42. Musselburgh Lagoons
43. Prestongrange Museum
44. Museum of Flight
45. Development Location and Accessibility
46. General Transport Impact
47. Longniddry-Haddington Route Safeguard
48. A1 Trunk Road Roadside Facilities
49. All Development Policies

List of New Policies to be Introduced (please see Monitoring Statement)

1. Air Quality
2. Protection of Battlefields
3. Countryside Around Towns
4. Designation of Local Geodiversity Sites;
5. Special Landscape Areas (to replace Areas of Great Landscape Value);
6. Gypsy/Travellers
7. East Linton Station Safeguard
8. Energy including Renewable Energy
9. Low and Zero Carbon Generating Technologies in New Buildings
10. Extraction of Shale Gas or Oil
11. Waste Water
12. Soils



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How to contact us

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